

Conclusions

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This conclusion sums up what we have learned comparatively about policy change and the role of discourse in Europe. It presents the results of this volume by focusing on four key themes that cut across the case studies presented. The four themes refer to discourse, learning, the relationship between the power of ideas and interests as seen through discussions of arguing *vs* bargaining, and Europeanisation. The case studies provide a very rich resource in our search for theoretical generalisations on these main themes, largely because they illustrate policy change and the role of discourse in Europe under very different sets of institutional and organisational rules (from the WTO to the European Union and domestic settings).

DISCOURSE: TRANSFORMATIVE POWER AND LIMITATIONS

As a major theme in our project, the role of discourse in the policy process is addressed by all papers in this volume, although with various emphases. Before proceeding with the discussion of how these papers lend insight into this theme, we first recap our conceptualisation of discourse in this project. Then we consider the nature of a ‘good’ discourse and what makes for a transformative discourse.

Discourse in Perspective

Discourse has both an ideational dimension and an interactive dimension. Put differently, it is a set of ideas and an interactive process. The ideational dimension itself divides into two intertwined kinds of activity: a cognitive activity which enables actors to make sense of reality, and involves knowledge, policy analysis, information about problems, actors and resources; and a more normative activity of assessing and judging reality, which thus refers to the world of norms, values and principles. The

interactive dimension of discourse also divides into two kinds of activities: the co-ordinative (involved in policy actors' construction of an agreed-upon policy) and the communicative, encompassing political actors presenting such policy for public deliberation and legitimation. This interactive dimension is essential because it brings both agency and institutions back into the analytical framework of discourse. The focus on actors engaged in discursive practice – a theme running throughout the articles – enables us to connect ideas with action, and to show how actors convey inter-subjective meaning and enact norms and values. Moreover, the insistence on seeing discourse within institutional context – the basis for the claim that our approach is a form of 'discursive institutionalism' – enables us to explore the differing emphases in discursive action in different institutional settings, that is, on the co-ordinative discourse in multi-actor systems, the communicative in single-actor systems (see Schmidt 2002a and Introduction, in this volume).

Our approach to discourse has a political science-policy analysis orientation. This makes it different from (yet still conversant with) the major approaches to discourse analysis, that is, interpretative structuralism, critical discourse analysis, socio-linguistic analysis, and critical linguistic analysis (Phillips and Hardy 2002: 20). The emphasis we put on context differentiates us from socio-linguistic analysis. Essentially, we are less text-oriented than socio-linguistic scholars interested in what goes on in conversations, focus groups and interviews. However, we follow the socio-linguistic interest in the specific form in which discourse is cast, such as rhetoric, frames, story-lines and policy narratives. We share with critical approaches an interest in power and context (Fairclough 1995). The studies presented here show how discourse as both ideas and interaction creates and sustains unequal relations of power (the so-called distal context). In most of our stories, there is someone who wins and someone who loses. However, we do not say anything about power abuse, disciplinary discourses, privileges hidden in dominant discourses, and about how some actors are discursively relegated outside the perimeter of decision-making activity. Our notion of discourse differs from the more macro-political concept of discourse used by Foucault – a concept more suitable to describe entire social institutions, such as education, family and medicine. Simply put, we accept that reality is socially and discursively constructed, but do not engage with the critical orientation of some discourse analysis traditions. A final point to bear in mind when looking at the results of our project is that we do not make any assumptions about the coherence or 'truthfulness' of discourse. Indeed, as will be shown below, in some cases we find loosely

integrated discourses and double discourses, and discourses that appear true in one place and time and false in another.

Having said that, what is a 'good' discourse in politics? In our project, we are not interested in discourse *per se*, but in the role of discourse within processes of policy change. The contributors to this volume have provided empirical evidence on the conditions under which discourse is a key factor in policy change and the conditions under which discourse has a limited importance.

The Nature of a 'Good' Discourse

In answering the question about the nature of a 'good' discourse, we first of all need to address the question of truthfulness in discourse. Here, Eve Fouilleux argues convincingly that a 'good' discourse – that is, a discourse with potential for policy change – is not necessarily truth-seeking and, depending upon the context, can be seen as 'false' in one arena and 'true' in another. The point to emphasise is that the truth or falsity of a discourse is not so much at issue here as the strength of the argument – with truth not something that can be assumed because it may very well be constructed in the process of making an argument, even if losing the argument does not necessarily entail that a discourse was false. We need not be relativists to make this claim, since all we are suggesting is that truth is something that is itself contested, with discourse part of a dynamic process of creating an inter-subjective reality through a deliberative process in which one hopes to convince others of one's own 'truth' or vision of the world. In such a vision, however, we are not talking about creating something out of whole cloth, but rather of constructing a convincing picture or narrative from various elements, only some of which may be in contention.

Thus, although sometimes a discourse may introduce new 'facts' or information and show the falsity of the old, especially if technical knowledge is in question, often it is a matter of reinterpretation in which some generally agreed 'facts' are downplayed, while others brought to the fore. Similarly, moreover, although a discourse may bring in newly emerging values, it may instead simply emphasise other long-standing values in the society's repertoire (see Schmidt 2000; 2002: chapter 5). The European initiatives with regard to trade and agriculture, as discussed by Adrian van den Hoven and Eve Fouilleux, illustrate how the Commission was able to make 'good' arguments by bringing different 'facts' into evidence – for example, the problems of the third world and environmental sustainability – and by emphasising different values, that is, the moral imperatives involved in promoting economic development and

environmental protection as opposed to the economic ones represented by existing policy, which protected the narrow self-interest of some EU member states. Geddes and Guiraudon, moreover, show how certain NGOs in the EU policy formulation process were able to build on existing ‘facts’ – Treaty-based legal provisions with regard to the EU’s Single Market and the social dimension – as well as newly emerging values related to concerns about racial discrimination in order to make a good argument for passage of extended EU anti-discrimination provisions.

Complicating matters of truth and falsity is also the question of language and culture – where misunderstandings arise out of different translations or interpretations of a single set of terms. In defence and security, for example, Jolyon Howorth shows that the French and the British had different understandings of the St Malo declaration on European defence: ‘European autonomy underpinning the vitality of a modern Atlantic alliance’. ‘The French knew more or less what they understood by that formula. It was not the same thing as was understood by the British.’ Thus, as Howorth concludes, the same discourse was ‘read’ in radically different ways by France and Britain because the cognitive and normative lenses are not the same in the two countries. But while the same discourse may take on different meanings in different cultural contexts, it may also be used in different policy contexts for different strategic purposes. This is how Eve Fouilleux describes the ‘double discourse’ of Commission agricultural policy, in which the very same discourse of ‘multifunctionality’ was employed at the international level to defend the EU from outside pressures for change, and at the EU level to push for internal reform. Here, the strength of the discourse comes from the Commission’s seeming coherence, through the use of a single set of ideas in two different policy arenas, as opposed to the contradictory nature of national leaders’ discourses, where they said one thing to the outside world – for example, that they wish to promote third world development – and another to domestic constituents – that they will do everything to protect national agricultural interests.

Coherence can, in fact, underpin a ‘good’ discourse. But it is not always necessary or possible. There is also much to be said for maintaining a certain ambiguity or lack of coherence in the discourse. The diplomatic success of the St Malo agreement came from its ambiguity, which is what enabled the French and British to agree on a new defence initiative in the first place (its subsequent problems came from the fact that the differences of interpretation were papered over rather than confronted, as argued by Howorth). Ambiguity has also been a plus with regard to EU immigration policy, as Andrew Geddes and Virginie Guiraudon point out. It was the very

ambiguity (hence malleability) of the EU discourse on anti-discrimination policy that allowed domestic policy-makers in France and the UK to fit EU policy into different domestic paradigms. The malleability of the ‘policy frames’ of social exclusion and anti-racism were what enabled policy-makers to make ideational and policy linkages that redefined the problems and made them more amenable to collective action.

But even if a discourse is good in terms of its ideas, whether because of their coherence or ambiguity, because they muster new ‘facts’ in evidence or emphasise newly emerging values, will it be good in the sense of being convincing? Here, much depends upon the interactive dimension of discourse, that is, how the discourse is constructed in the co-ordinative sphere and conveyed in the communicative sphere. Howorth’s discussion of the security and defence domain illustrates the importance of this interactive dimension in addition to the ideational. The French security and defence discourse was convincing not only because French leaders had developed a new, coherent set of ideas about European security and defence that was perfectly consistent with the St Malo initiative as well as with the past. It was also due to the fact that the French had over time built up a large epistemic community receptive to such ideas, that the co-ordinative discourse on defence policy was itself quite wide, and that it was easily carried over into the communicative discourse to the general public. In Britain, by contrast, the St Malo initiative of necessity contradicted previous discourse and ideas, and therefore required a powerful discourse to convince all and sundry. But, as Howorth makes clear, although British Prime Minister Blair had the ideas, he did not have the discourse. To have been effective in his approach to European defence policy, Tony Blair would have needed no less than four separate discourses: one for his European partners, one for the UK élites, one for public opinion in Britain, and one for Washington. This was a near-impossible task, as Howorth notes, but it is one that Blair did not even try. Had he, he might at least not have had to worry too much about a lack of coherence between the four discourses, especially if all four were couched in ambiguity (note the success of the ‘Third Way’ discourse despite – or perhaps because of – its ambiguities). After all, as Kratochwil and Ruggie (1986: 770–71) observed on a broader point, there is no correlation between the coherence of international regimes and their strength.

The Nature of a ‘Transformative’ Discourse

But even if a discourse is good and convincing, whether coherent or ambiguous, can it be ‘transformative’ in the sense of bringing about policy change? Here, our strongest cases for transformation come from the articles

by Adrian van den Hoven, Eve Fouilleux, and Geddes and Guiraudon. For van den Hoven, the transformative power of discourse is evident in entrepreneurial actors' ability to entrap their 'publics' in rhetorical action. Such entrapment, as Schimmelfennig (2001) explains, is a way to put social pressure on actors who do not change their preferences, but are obliged to follow the policy implications of discourses they have accepted in the past. Thus, in the case of trade policy, Commissioner Lamy managed to craft a new, more development-friendly discourse which changed the meaning of the EU's original trade mandate without any change in the mandate itself – something which would have required lengthy intra-EU negotiations and which could have become bogged down in member state objections to changing the legal basis of negotiations. This change of meaning – with no change in legal resources – delivered concrete policy changes: the developing countries got more from the EU at the Doha WTO Ministerial meeting than at the Seattle meeting, while member states were 'trapped' into agreeing to concessions that they had previously resisted. This is an example of how far specific forms of discursive strategies (in this case, rhetorical entrapment) can go. Moreover, it speaks to the fact that discourse is a lot more than talk, since it commits those who engage in it to action – in this case, concessions that individual member states might have preferred to refuse, but could no longer do so without undermining the EU's credibility as an international player.

Geddes and Guiraudon demonstrate the transformative power of discourse by focusing on ideational and policy linkages that entrepreneurial actors can make in the EU policy process. The proposed Directive against race discrimination looked set to come up against major French opposition, because it clashed with traditional French ideas about citizenship that proscribed differentiation according to race and precluded even collecting race-related statistics, so that racial discrimination was long dealt with only as a socio-economic issue. But once an 'advocacy coalition' of NGOs and others at the EU level had re-interpreted the problem of race as yet another implication of the jurisprudence and Community legislation following from Article 119 on gender equality, French resistance was diminished. Moreover, the new discourse resonated rather well with the French norms of *égalité* at the same time that it also responded to the main political issue of the moment, by providing a political linkage between anti-discrimination and the concerns about the political power of xenophobic right-wing parties in Austria – an issue on which governments like the French were keen to show that the EU was prepared to provide some concrete policy initiatives. These ideational factors, together with a confluence of interactive factors –

such as the fact that business was largely excluded and parliament included in the co-ordinative discourse at the EU level – yielded a fast approval of the Directive.

What about the limitations of discourse? Our contributors suggest three insights with reference to international and EU policy. First, it is clear that ideas and discourse alone are often not enough to engender policy change. Other factors may play a major role in whether a discourse is successful. International political life, for one, penalises ‘bright ideas’ that are not supported by robust diplomatic processes. As Howorth shows, *ceteris paribus*, the lack of serious investment in diplomatic processes contributed to the fragility of the transformative break-through represented by Franco-British agreement on defence policy at St Malo. Legal resources may also play a role, as in the case of immigration policy, where existing EU legislation facilitated the task of NGOs intent on pushing anti-discrimination policy at the EU level, while it did nothing for NGOs with a competing agenda focused on nationality and the extension of EU citizenship to legally resident nationals.

Second, international discourse does not always have ‘bright ideas’, while domestic institutional and policy patterns often show great resilience. As Andreas Busch demonstrates, European or international discourses had little effect on banking regulation in Germany and the UK. This is surprising, as we started our discussion of Busch’s project with the assumption that an international master discourse of financial liberalisation should have played a role. His findings point in the opposite direction: discourses of banking regulation are still domestic. Indeed, even domestic discourses are not particularly elaborated, especially in their communicative dimension. Rather, they remain almost exclusively within the co-ordinative sphere, a consequence of the highly technical nature of the issues confronting the policy sector, despite the sometimes heavy costs to the public resulting from bank failures. Within this co-ordinative sphere, however, it is important to note that institutional context still makes a difference. The discourse focused on banking reform in single-actor Britain was much more restricted than that of multi-actor Germany, with British officials telling business of its decisions as opposed to jointly deliberating and coming to a commonly agreed solution, as in Germany.

Finally, a discourse, however ‘good’ or compelling in its arguments, however successful in its co-ordinative and communicative interactions, can nevertheless fail if certain policy actors with veto power remain unconvinced. Thus, although the Commission has seemingly gained the moral high ground in its discourse surrounding trade and agriculture issues,

over time managing to persuade increasing numbers of policy actors and the public of the necessity and appropriateness of its position, it has not changed the views of key national players with national interests at stake. Changing policy, in fact, is not only a question of discourse. It is also one of learning.

LEARNING BY ARGUING AND BY INTERACTION

A good deal of the literature on the politics of ideas and policy change is concerned with learning (Laird 1999; Page 2000; Radaelli 1995; Sabatier and Jenkins-Smith 1993). Overall, the empirical evidence presented in this volume suggests that it is difficult to produce ‘thick’ learning (Checkel 1998), that is, learning involving change of actors’ preferences. None of the case studies presented here provides strong empirical evidence of thick learning, although van den Hoven shows that in the long term a new discourse may re-focus the preferences of EU member states (in his example, in relation to the role of developing countries in world trade).

The Scope of ‘Learning’ in Policy Change

What about ‘thin’ learning, that is, learning limited to coping strategies? Strategic ‘framing’ (anti-discrimination policy), discursive reform strategies based on Europeanisation (telecommunications), rhetorical entrapment (trade), policy-analytic learning (agricultural policy), domestic learning (banking supervision) and learning about ambiguous ideas (defence policy) play an important role in the narratives discussed here. They are more similar to ‘thin’ learning than to the ‘thick’ variety.

The classic condition leading to learning is failure. In agricultural policy, the Commission learns about the importance of investing in analytical methodologies for the analysis of policy after having experienced the painful consequences of ignoring the political role of policy tools in the context of the OECD. In defence policy, Blair learned about the necessity of European policy after a briefing in mid-1998 on Kosovo. In a sense, the failure of democratic values epitomised by the Haider phenomenon in Austria convinced all member states that a Directive against discrimination had to be produced swiftly – to give a signal to the European public.

Another important distinction is about domestic and international or EU learning. Two articles (anti-discrimination policy and defence policy) show how go-betweens and policy experts actively engage in embryonic networks of international learning. The most striking evidence comes from defence policy – a hard case for international learning. Howorth shows that

a handful of UK officials, at least for a short period, engaged with French and German counterparts in the creation of a new paradigm for EU defence policy. A small international community was at work, seeking to provide ideas for major innovations in European thinking about collective defence. But ideas without discourse and without diplomatic processes, as we have already suggested, do not produce policy change. One important lesson is that the analysis of international epistemic communities should be integrated with the analysis of domestic politics and diplomacy. Another lesson, however, is that events can derail any discourse and policy initiative, however promising. In this specific case, it was the terrorist attack of 9/11 on the World Trade Center that put the UK and France on a more divergent course.

The EU level has been described as a platform for learning and policy transfer. The debate on how much learning and transfer is really going on in the EU is still fully open (Bulmer and Padgett 2003; Radaelli 2000). Our studies suggest a note of caution. In anti-discrimination policy, the EU level – Geddes and Guiraudon write – ‘is not where “social learning” takes place and worldviews are altered, but it can legitimate certain models that national-level actors can then invoke to push for change at that level’. But whether social learning then results at the national level remains open to question. In telecommunications policy, too, social learning is an open question. Mark Thatcher shows that domestic reformers make use of the EU in their discursive and political strategies to gain legitimacy for their actions, and only in the case of Italy might one be able to argue that the EU is also a source of social learning. Howorth, moreover, argues that, notwithstanding the efforts of embryonic epistemic communities, there has been little cross-national learning in EU defence policy. Finally, Busch concludes that the EU has not provided social learning. Neither has it provided models for policy transfer.

The relationship between policy transfer and models is important. Three case studies focus on the role of EU models in policy transfer. In telecommunications, EU-generated templates for reform have typically imposed minimal requirements on member states. Domestic coalitions for reforms have been very creative in going beyond the EU model, by using the EU discursively. The point is often neglected in the literature on Europeanisation: the claim is that adaptation hinges on the presence or absence of national models to be imitated (Knill and Lehmkuhl 2002), but the analysis should also explore how domestic actors can play creatively with these models, by amplifying or narrowing down their implications for domestic policy regimes. Two other case studies (banking regulation and

anti-discrimination policy) lead to the conclusion that, without EU models, cross-national learning via policy transfer remains limited. However, in the case of anti-discrimination policy, the absence of EU best practice and desirable models (the UK system was transferred to the EU at a time in which it was under serious criticism at home) creates malleability of the policy frame, and a EU solution can be created by adjusting the emphasis of discourse (from racial problems to equality). By contrast, in banking regulation the lack of shared beliefs about desirable models, solid intellectual foundations of policy models, and epistemic communities anchored to a preferred policy solution limit the potential of policy transfer. This result is consistent with the argument that policy transfer is facilitated by an anchorage to 'best practice' or EU desirable models (Radaelli 2000), although one should also account for the creativity of domestic policy entrepreneurs in defining the implications of EU models via appropriate discourses (Thatcher in this volume).

Arguing and Bargaining

The discussion of policy learning lends itself quite naturally to the question of discourse versus interests. To what extent does the political logic of discourse trump material interests? We have already answered this question in theoretical terms in the Introduction, by arguing that our approach to discourse analysis is complementary to other main approaches to institutional analysis, such as rational choice and social constructivism. The aim here is to draw on the empirical material contained in the articles. In order to appreciate the insights provided by this material, we start from the statement that most of the current debate is 'polarised'. Further to Risse's article on arguing (2000) and social constructivist work on European integration (Christiansen, Jorgensen, Wiener 2001), there is a tendency to contrast a 'communicative action pole' and a 'strategic action pole'. True, Risse (2000:4) looks at three logics, that is, communicative, consequential and the logic of appropriateness. But the lively discussion taking place in European Studies and International Relations has often contrasted arguing versus bargaining, thus reducing the logics to two. On the one hand, social constructivists work on a 'pole' dominated by communicative action, truth-seeking behaviour and discursive argument as the main element explaining international policy processes. This logic is said to be characteristic of 'fora' (as opposed to 'markets', following Elster 1986). The conclusion is that arguing in fora is typical of political life, whereas the logic of 'markets' is the quintessence of economic behaviour. On the other hand, varieties of rational choice scholars are confined to the 'pole' of strategic action (logic

of consequentialism, in Risse's article) and bargaining.

We argue that we have nothing to gain from this dichotomisation of the discussion and from lumping together communicative action and arguing on one pole and strategic action and bargaining on the other. Katharina Holzinger (2002) has persuasively demonstrated that the dichotomisation is possible only in debates internal to Habermas' theory, in which the logic of communication is defined narrowly (that is, actors with authentic intentions and a motivation to seek the truth). However, in more general 'Political Science – International Relations' discussions communicative action includes also interest-driven communication. Strategic action (for example, in game-theoretical notions) 'often consists of acts of communication' (Holzinger 2002: 4).

Further, Holzinger explains that arguing cannot be encompassed by the Habermas meaning of communication, because actors can argue to defend their interests, as shown by van den Hoven in his contribution to this volume (and in more general terms by Schimmelfennig 2001). Arguing and bargaining play different roles, but can be used as means to pursue the same goal. Actors seek to reduce the difference between their preferences by dint of persuasion, but they can also 'buy and sell' (the core of bargaining) in the same policy process. There is a bit of 'market' and 'forum' in all the policy processes examined in this volume. Bargaining in the WTO takes place in the context of arguments, justifications and rhetorical action as van den Hoven and Fougère suggest. Policy-makers change telecommunications policy by using 'Europe' as discourse, and by extending discursively the implications of EU templates and directives – a point made by Mark Thatcher.

We did not find 'pure conflicts of interests' based exclusively on bargaining (see Holzinger 2002 on types of conflicts). The closest case is banking regulation. Neither did we find 'pure conflicts over facts' in which actors use argument to establish the truth. We found conflicts of policy paradigms, norms and values – especially in anti-discrimination policy and defence policy – in which arguing is often used as a means to bargaining (a point on which we concur with Holzinger), but can also have more transformative effects.

Howorth starts with the claim that the very notion of national interest is somewhat elusive and irrelevant. In his case, actors have to argue, define ideas, agree on a declarations and statements before they can bargain. Fougère shows that the narrow bargaining phase is nested (and in a sense pre-determined in the range of outcomes) in previous policy-analytic phases in which instruments for policy evaluation and standards of policy

appraisals are chosen. Van den Hoven starts with interest-based rhetorical argumentation based on moral arguments. His story, however, goes well beyond an interest-based explanation of international trade. In fact, once the moral arguments about the development round are accepted, actors bargain concessions that were inconceivable at Seattle. They also alter their own perceptions of policy problems. Van den Hoven notes that the US position (in terms of hard material interests) 'was much easier to reconcile with developing country demands than the EU position'. Finally, the discourse on the Development Round – van den Hoven concludes – can in the long-term change the beliefs of policy actors.

Our conclusions are the following: We reject the separation between arguing and bargaining, or 'market' versus 'forum', or 'ideas' versus 'interests'. Actors use both the logic of arguing and the logic of strategic behaviour. Under conditions of radical uncertainty (Howorth refers to the blank sheet of history), arguing precedes bargaining. When interests are more defined, interest-based arguing can pave the way for major transformations of interests. On balance, discourse cannot be reduced to material interests because of its transformative effects.

CONTEXTUALISING EUROPEANISATION

Our approach to Europeanisation has been informed by two aims, that is, to bring the institutional context back into the analysis of the domestic impact of EU policy and to make use of bottom-up designs. The endogenisation of the international context enables us to understand if, when and how EU actors are empowered in relation to other EU actors and to member states. The case studies on agricultural policy and trade policy show how the European Commission or individual Commissioners can increase their power resources via international arenas like the WTO. Telecommunications, by contrast, shows how the power of EU institutions is not as great as assumed in the standard accounts of Europeanisation, once one enters international political economy variables (such as regulatory competition). In France, Germany and Italy – Thatcher shows – national strategies for competition in network operation altered in response to non-EU factors. We wish to stress this point because the majority of research designs on Europeanisation bracket the 'global' context and international political economy variables and focus exclusively on the power relations between EU and domestic actors. Our claim is that by doing so researchers do not get the power relations right, or may not understand where power comes from. Europeanisation, therefore, is yet another area where there is

potential for cross-fertilisation between international political economy and European Studies (see the review of international political economy approaches to EU public policy studies provided by Jones and Verdun 2003).

In the Introduction, we also took issue with research designs that start from the EU level and look for effects at the national level. We argued, instead, for the need to contextualise Europeanisation by focusing on what goes on (in terms of resources, policy problems, discourses and power dynamics) at the domestic 'hub' of the problem – that is, bottom-up designs. Mark Thatcher and Andreas Busch illustrate the results of such an approach. Thatcher focuses our attention on the range of factors that explain change, of which Europeanisation is not the most central. Actor-centred analysis enables him to find out that Europeanisation may offer to domestic coalitions for reforms new resources to pursue their goals – independently from the degree of adaptational pressure that the EU policy puts on domestic regimes. State structures in telecommunications changed because of non-EU factors, such as PTO management's preference for more autonomy from the state and privatisation, the necessity to access capital markets (easier under privatised regimes), the goal of forming international alliances based on cross-shareholdings, responses to increasing complexity and information asymmetries (which suggested independent regulators instead of state monopolies), and perhaps the view that 'freer' PTOs could become stronger national champions in the world race. Opposition to these ideas was stiff, and although the EU requirements did not go beyond the prohibition of maintaining PTOs as regulators – thus creating only limited adaptational pressure – 'images' of Europe were used by domestic reformers to show that the opposition was fighting a lost cause. Thatcher concludes that 'the effects on actors must be considered rather than assuming that the lower the goodness of fit, the greater the imposition on domestic actors'. In a sense – Thatcher suggests – adaptational pressure was discursively constructed, and in this specific case amplified. We would add that future research should explore to what extent one can talk of an inter-subjective quality of Europeanisation instead of looking at it as an objective and measurable variable that exists independently of social interaction. To paraphrase Kratochwil and Ruggie's (1986: 763) statement about regimes: there exists no external Archimedean lever to assess Europeanisation as it 'truly' is. It is not a concrete entity, but a conceptual creation in which inter-subjectivity plays an important role.

In another exemplary bottom-up research design, Busch achieves two results. First, he makes a compelling case for divergence of banking

regulation regimes. Second, he explains divergence in terms of institutional resiliency, national patterns of politics and policy-making processes, lack of European templates and shared ideas about desirable models, and limited public discourse. His findings on national persistence shed light on the limitations of the EU as a platform for policy transfer and diffusion of models. Thus, not only is Europeanisation contextualised in relation to domestic policy patterns, but domestic institutions are successfully brought back into Europeanisation research.

Finally, research on Europeanisation would be more successful if – alongside the plethora of studies on how much ‘Europe’ hits the national political arenas – we achieved a better understanding of the limitations of Europeanisation. The ‘power of Europe’ is measured both in terms of where it is a force for change in a national policy sector and where it is not. Busch provides useful suggestions about the conditions under which Europeanisation does not affect domestic policy patterns. His findings show that in the absence of a compelling set of ideas about what is to be done, and an EU-level push for common action based on such ideas, whether coming from the Commission and/or member states, ideas and actions in response to crisis are likely to be purely domestic in content and inspiration. Fouilleux, however, shows that even in the presence of a seemingly compelling set of ideas on policy change, Europeanisation may be limited if it goes against the preferences of national actors who have another set of ideas and the capacity to resist – as in the case of national governments balking at Commission-proposed change in agricultural subsidy regime.

We conclude these thoughts on Europeanisation by noting that our case studies shed a very critical light on adaptational pressure and ‘goodness of fit’ as general explanations of Europeanisation (the argument is made by Börzel and Risse 2003). As already observed, telecommunications policy provides considerable empirical evidence to show that, once actor-centred analysis and bottom-up designs are taken into account, adaptational pressure may not explain much of Europeanisation dynamics. The case study on anti-discrimination is entirely paradoxical for ‘adaptational pressure’ theorists. In 1993–97, the UK, the country with the best ‘fit’ with EU-proposed anti-discrimination measures, opposed EU policy, while the French government was keen on the EU anti-discrimination position, although pressure on the domestic regime would have been high. Further, discursive re-framing may entirely change the perception of pressure on the part of policy-makers. This is yet another example of the inter-subjective quality of Europeanisation: adaptational pressure is not an ‘external’, objective entity, but it is constructed in EU and domestic political discourses.

CONCLUSION

Thus, our case studies suggest that discourse does indeed play an important role in policy change in Europe, but that other factors also matter. As a set of ideas, a 'good' discourse requires arguments in which truth or coherence are not so much at issue as the ability to introduce new 'facts', to emphasise different values, to 'argue' even in the context of 'bargaining'. To be transformative, however, a good discourse must also be able to induce policy change, which can come about through 'rhetorical entrapment' as much as by providing actors with new ways of conceiving of a policy, of coordinating policy agreement and/or of legitimating policy through public communication. But however 'good' the discourse, it may not prove transformative if, for example, certain key players with veto power are deaf to the discourse, or if diplomatic processes or legal resources are absent. Moreover, discourse may itself play little role in policy change where 'bright ideas' are missing, where 'learning' is hindered, or policy transfer absent. Finally, although Europeanisation may be a significant factor in discursive adjustment, its power in terms of policy change should be examined in the context of other factors – international or domestic.

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