The role of implementing agencies’ expertise in Common Agricultural Policy reforms

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Abstract

Literature on the EU policy process has largely neglected how European institutions, such as the Commission, learn from experiences during the implementation of EU policies, and how these lessons influence the policy process. Often, national implementation agencies play a significant role in interpreting and executing these policies. Meanwhile, the Commission shows interest in this kind of information, as it has adopted a “better regulation” and “simplification” discourse, through which they aim to improve the quality of their regulation. In order to understand this process of learning, this article will look at how, and through which channels, these agencies mobilize their information and expertise on the implementation of EU policies. Therefore, this paper will study the strategies used by implementing agencies before and during the most recent reform of the Common Agricultural Policy, and how the Commission has responded to these attempts. Special attention will be paid to the Learning Network of Paying Agencies, founded by national agencies charged with a large share of the implementation of the Common Agricultural policy. Through this cross-national collaboration implementing agencies started to advice the Commission the implementation aspects of its policies. By studying the efforts and strategies of these agencies through document analyses and interviews, this article will provide new insights on how policy experiences can contribute to learning in complex organizations, such as the EU. The findings indicate that implementing agencies in the CAP have successfully created a new venue for lobbying interaction with the Commission. This provides them with substantial potential for influencing policies, because of their cross national collaborations, and frequent interactions with Commission representatives. The implementing agencies focus predominantly on the technical issues of the CAP, which would be suitable to result in an instrumental use of their ideas by the Commission. However, in practice their influence is very limited.

Introduction

European Union (EU) policies have a reputation of being complex, ambiguous, and generally difficult to implement, with high regulatory burdens. Even the European Commission is aware of this notoriety. During the implementation phase, national implementation agencies are often burdened with interpreting, implementing and evaluating EU policies.

Guided by the better regulation discourse, aimed at improving the quality of EU regulation, the Commission increasingly shows interest in these types of implementation experiences. One important element of the better regulation program is the idea that policies can be changed for the
better, regarding the regulatory burdens, based on policy experiences. More specifically, better regulation consists of three elements: governance, competitiveness, and legitimacy (Radaelli & Meuwese, 2009, p. 639). The governance element mainly relates to increasing the role of evidence in public decision making, for example through consultations with affected interests. In these consultations implementing agencies are regularly included. The competitiveness element is associated with minimizing the regulatory burdens. This applies directly to one of the core businesses of implementing agencies: carrying these administrative and regulatory burdens. The legitimacy element refers to increasing the transparency in decision making procedures. Although the link between implementing agencies and this legitimacy element is less explicit, the former two elements indicate that implementing agencies hold a particular value in the better regulation program.

Also in academic literature this relationship between bureaucrats and policy administrators, such as implementing agencies and policy changes has been acknowledged (e.g. Hall, 1993; Rabe, 2004). However, the actors involved in implementing policies are often not the ones to decide about the future of a policy. Especially in the EU, there is a large distance between those who implement and those who formulate new policies (Young, 2010, p. 64). This means, that in order to affect policies, implementing agencies will have to mobilize their experiences in order to have their voice heard by those who are more directly involved in the process of policymaking.

Still, academics have not yet looked in depth at the role of implementing agencies in processes of policy change. Thus, in order to really understand how experiences from implementing policies play a role in the EU policy process, it is important to get a fuller picture of the causal chain between practical policy experiences and policy changes. Therefore, we need to improve the knowledge about which implementation experiences are mobilized, gathered, and how this happens, besides looking at how this information is used. Therefore, this paper will look at the mobilization of these experiences.

The 2013 reform of the Common Agricultural Policy (CAP) offers a compelling case in which this knowledge can be developed, for two reasons. First, during this policy reform existing policy instruments were to be reviewed, while new instruments were introduced. The experiential knowledge of implementing agencies can be a valuable resource for both. Second, in the run-up to the 2013 CAP reform, domestic implementing agencies organized collectively in the Learning Network for Paying Agencies and Coordinating Bodies with the goal to influence the policy agenda.

Accordingly, this article will first elaborate on how implementation experiences can be transferred from the agencies to EU institutions, and how implementing agencies play a role in this
process. Then, after a brief description of the data and case study method, the role of implementing agencies in the 2013 CAP reform is discussed in-depth.

**Transferring experiences: from implementation to policy learning**

During the implementation of a policy, interaction between those who designed the policy and those responsible for implementing it is very common. This makes it hard to make a clear distinction between implementation and policymaking (Jordan, 1999). Implementation literature looks at these interactions, particularly those concerned with bottom-up processes (e.g. Matland, 1995; Berman, 1978; Hjern & Hull, 1982). However, this literature is limited to how policies are translated into practice, and fails to look at the impact of the interactions between implementing agencies and policymakers for further policy developments.

In academic literature, the contribution of practical experience to the policy process is often studied in relation to policy learning, and policy feedback. The concept of policy learning is based on the idea that practical implementation experiences can trigger specific moments of learning, in which ideas and beliefs toward a policy are updated (e.g. Bennet & Howlett, 1992; Hall, 1993; Dunlop & Radaelli, 2013). This is especially thought to be true for experiences from bureaucrats, such as implementing agents, who are involved in administering a policy program (Hall, 1993).

As mentioned in the introduction, EU policies come with a large distance between the formal policymakers and these administrators or implementers. As a consequence, implementation experiences have to be transmitted from the actors who implement the policies, to those who formulate policies, or eventually decide upon them. If the latter take the role of learner, the former can be seen in the role of teacher.

The practical expertise, and experiential knowledge, of these implementing agencies should be regarded an as important resources to obtain access to the policy process, as this is a type of information, the Commission is lacking (Henning, 2009; Bouwen, 2002). The literature, however, tells very little about which experiences are actually put to work, and how this is done. This requires an understanding of strategic actions, and efforts from these actors to convince others of the importance of their ideas, in order to potentially influence the way they look toward a policy (Carstensen & Schmidt, 2015). Therefore, we will take a closer look at how implementing agencies act in their role as teacher.
Implementing agents as strategic teachers

For the Commission to learn from practical experiences with the implementation of its policies, it has to acquire this type of information. Often, this occurs through predetermined evaluations and assessments (e.g. Radaelli, 2009; Farrell, 2008). Especially on the role of evaluations in the policy process, a lot has already been written (e.g. Højlund, 2014; Henry & Mark, 2003; Weiss et al., 2005). However, implementing agencies can also take an active role in this relationship.

In this process, we assume implementing agencies act strategically. The decisions about which channels to use, and how ideas are presented are thought to be deliberate, although actors are considered to be limited in their information processing capacities (Zwaan, 2012; Hay & Wincott, 1998). In order to improve the understanding of the role of implementing agencies in the EU policy process, we can look at two aspects of their strategic behavior: the channels they use for mobilizing their experiential knowledge, and the way in which they present this information. How this looks like in practice, is influenced by contextual factors. Because little is known about the role of implementing agencies in the EU policy process, literature from related fields will be used to raise some expectations for a further exploration.

With regard to the channels that are used there is an emerging body of literature looking at the role of subnational authorities (SNAs), such as regions. In this direction, scholars have looked at how SNAs have mobilized themselves in order to influence EU policymaking. Although there are differences between implementing agencies and SNAs, both have implementation tasks, and are not directly represented by the central government of a Member State.

Beyers, Donas, and Fraussen (2015) have studied the venue selection of SNAs. They draw an image in which these SNAs interact frequently with both European institutions, such as the Commission and the EP, and Member State representatives. In explaining the targeted venues, position alignment is seen as an important factor. SNAs are found to use those venues, which show overlap with their own interests. Moreover, Kölling (2015) shows that SNAs are likely to rely on existing institutional frameworks for access, either domestic or European. If these existing frameworks for access to the policy process are inadequate, SNAs might explore other venues.

The goal of access is also important. In order to affect the policy formulation, actors must lobby at the supranational level, particularly the Commission, as formal agenda-setter. While central governments of Member States are better for affecting the decision-making stage (Woll, 2006).
Expectations about how, and which experiential knowledge is presented is interesting to turn to the demand side of the process. Earlier, the importance of experiential knowledge for policy learning was mentioned. From a policy learning perspective, zooming in on the use of knowledge can also help to say something about the expected role of implementing agencies. Experiential knowledge can be used in different ways, similarly to other types of information (cf. Weiss, 1998; Amara et al, 2004). Considering these different uses, the way in which experiential knowledge is presented is relevant, as not all knowledge is suitable for all uses.

In this regard a general distinction exists between instrumental and conceptual utilization of knowledge (Radaelli, 1998). Instrumental use means that knowledge will be used in order to update policy instruments, mainly to improve the efficiency and effectiveness of a regulation (Weiss, 2005). This way of using the information can be clearly linked to the competitiveness element of better regulation. Conceptual use refers to more indirect uses of knowledge, often for political gains (Radaelli, 1998, p. 161). This means that knowledge can be used in order to support ones views, or for the legitimization of a policy.

Following the assumption that they behave strategic, actors are expected to present their ideas in a way which is suitable for serving the best representation of their interests (Minstrom & Vergari, 1996). Subsequently it can be assumed that the main purpose of gaining access to the policy process is to obtain influence. Hence, an instrumental use of knowledge would be expected to be the most desirable outcome from an implementers perspective (cf. Henning, 2009). Moreover, the better regulation program puts the Commission in a situation with pressure on delivery, results, and performance. This pressure is thought to make the Commission eager to learn from experiential knowledge in order to improve upon their policy proposals (Radaelli, 2009; cf. Boswell, 2008).

The best way to present or frame knowledge suitable for instrumental use is in the form of a cost-benefit analysis, in which the potential losses and gains are clear (cf. Radaelli, 2009). Moreover, technical information seems to be suitable for this type of use (Princen, 2013; Michalowitz, 2007). This is particularly the case for technical issues, such as implementation practices. Information presented in this regard has to be relatively non-controversial, and the implied changes have to fit the existing structure of the policy program (Weiss, 1998). These are often incremental changes, which occur within a specific part of the policy program (cf. Kuipers et al., 2013).

\[\text{1 In addition, instrumental use of information is more likely in relatively stable policy environments, or at the other extreme policy.}\]
Taking in consideration these ideas about the channels and ways for bringing experiential knowledge to the EU policy process, it will be expected that position alignment, institutional opportunities, and the goal of access play a role in picking the channels used by implementing agencies to mobilize their experiential knowledge. Moreover, ideal typical behavior by implementing agencies would be to focus on technical information.

**Method**

In the following parts of the paper, an exploratory case study will be presented on the mobilization of experiential knowledge by domestic implementing agencies. In this process, domestic implementing agencies have organized themselves in the Learning Network for Paying Agencies and Coordinating Bodies, more commonly referred to as the Learning Network (LN).

The LN’s online network offers a unique insight in the discussions and sharing of experiences between implementing agencies and particularly EU institutions. Through a close analysis of the minutes of meetings, discussion papers, and the discussions amongst member state paying agencies, the process of mobilization of implementation experiences can be traced from the early stages of the reform process until the beginning of the actual implementation.

Moreover, the minutes from conferences and meetings provide insight in responses from the Commission and DG AGRI. Therefore, these data allow to obtain new insights in the micro foundations in which expertise is mobilized. In addition, interviews were held with the secretary of the LN and other employees of the Dutch paying agency Rijksdienst Voor Ondernemend Nederland (RVO) concerned with the implementation of the CAP.

The starting point of the analysis will be in November 2010, when the Commission first officially introduced its plans for the 2013 reform. Although at this point the agenda-setting for reform was already well on its way, this is the first point at which documentation could be found about the mobilizing efforts from implementing agencies.

First a short introduction to the more general aspects of the CAP and the 2013 reform will be presented, after which the role of implementing agencies in this reform will be discussed on basis of the channels they use and how they present their experiences.

The analysis will focus on the interactions between the LN as a representation of domestic interest groups, and the Commission and DG AGRI, as the most important actors in determining the formulation of the reform agenda, and the settings of the appurtenant policy instruments (Princen, 2013).
The Common Agricultural Policy of the EU: implementation and simplification

The Common Agricultural Policy (CAP) is particularly known for taking up a very large chunk of the EU’s budget. These funds are used to support farmers, both in their production, and in their efforts for rural development and environmental consciousness. The budget of the CAP is split in two funds: the European Agricultural Guarantee Fund (EAGF), and the European Agricultural Fund for Rural Development (EAFRD). These funds fall under the responsibility of the Commission.

However, under the title of shared management, the task of paying CAP beneficiaries is delegated to the Member States. Within the Member States, national or regional, paying agencies are tasked with this responsibility. These paying agencies are a particular type of implementing agency. First, these paying agencies must be accredited by the Commission, for which they have to comply to a number of criteria laid down in different legal acts. Moreover, the paying agencies are also responsible for checking the eligibility of potential CAP beneficiaries. In this regard, the paying agencies also have to implement systems for monitoring the eligibility criteria laid out in the acts on Direct Payments, and Rural Development Payments (SOURCE=Regulation, 2009).

These paying agencies face a lot of administrative and regulatory burdens, in particular when it comes to controlling the eligibility of farmers for receiving funds, but also the registration of parcels and other landscape elements relevant for granting EU funds. Related to these burdens, the concept of simplification is an important part of the overall better regulation strategy specifically applied to the CAP (European Council, 2016; Vásáry, 2013). Simplification in the CAP, according to the European Commission, is supposed to be “focusing on areas where those implementing the CAP would benefit most in terms of reduced administrative burden e.g. related to information requirements, control frequency and reporting” (Commission Communication, March 26th 2015). Therefore, the Commission must rely on practical expertise from “those implementing the CAP” (ibid.).

This makes the scheduled revision of the CAP offered a great opportunity to put the collective implementation experiences of these agencies to work in strategic attempts to influence the outcomes of the reform.

Experiential knowledge mobilized

What is immediately clear, is that during the CAP reform, paying agencies sought after direct interaction with the Commission and DG AGRI. Through the Learning Network of Paying Agencies and Co-ordinating Bodies (LN), national paying agencies have organized themselves in 2009 in order to
“initiate, co-ordinate and improve informal and practical co-operation between European Paying Agencies, Co-ordinating Bodies and EU institutions” (LN, 2014b). Through this Network, the paying agencies are successfully seeking continuously in interaction with the Commission. This is not limited to, but includes Regulatory Impact Assessments, evaluations, and public consultations. However, most of their communication takes place through informal meetings with representatives of the DGs, and the presentation of non-papers in which the LN elaborates on its ideas about the future of the CAP. One of their main goals is to partake an agenda-setting function, especially concerning the simplification of the CAP (LN, 2012f). The 2013 CAP reform was the first large reform since the paying agencies of different member started their systematic collective attempts to advice the Commission on the practicability of its policies.

The LN can be seen as a new channel for interaction between implementing agencies and EU institutions. There were other channels through which interaction took place, such as “exchange of experience workshops” in which DG AGRI and the different paying agencies discuss their implementation practices (Clisson, personal communication, 22-06-2016), and the Special Committee on Agriculture, in which implementing agencies often participate in cooperation with the Minister of Agriculture from their Member State. However, none of these channels allowed informal lobbying in the way that could affect agenda-setting in the way that was envisioned by the LN.

The continuous informal interaction between the LN and EU institutions can be seen as a deliberate strategy, opposed to other more passive strategies which could have been pursued, such as limiting interaction through expert group meetings. Through informal interaction, the Learning Network claims to have larger influence on the frequency of its meetings with the Commission, and its meetings are more on equal grounds (2012f). Moreover, the LN aims to maximize its influence by actively pursuing issues they think are relevant, instead of solely responding to the wishes of the Commission (Van Ek, personal communication, 2016).

Already at the early stages of the preparations for the 2013 CAP reform, paying agencies, through the LN, were actively mobilizing their experiential knowledge. They continued their activity throughout the process of policy formulation and decision making in attempts to keep the practicability of the proposed reform on the table. After the decision making stage, the LN kept pushing for more simplified policy instruments, particularly regarding the newly introduced greening measures.

Although there were other channels available, domestic paying agencies united their resources in creating a new channel for attempting to influence the agenda and formulation of the 2013 CAP.
reform, especially with regard to simplification. In the upcoming section we will take a closer look at the experiential knowledge which is mobilized through the LN during the 2013 CAP reform process.

**Experiential knowledge presented**

Already in November 2010, the Commission sent out a communication on the plans for a CAP reform for the period 2014-2012 (European Commission, 2010). One of the goals of the reform was indeed simplification (p. 6). Also some new policy instruments concerning the direct payments were introduced immediately, including greening measures (pp. 8-10).

In a first official response in March 2011 the LN argued that the new CAP must be simplified. In this stage of the reform process, the LN is attempting to convince the Commission of the necessity of simplifying the CAP, and the utilization of the LNs expertise in the process thereof. Therefore they refer especially to potential costs if this does not happen. For example, by pointing out that otherwise a timely implementation is impossible. Herein the LN refers to the upcoming reform as “the perfect platform” to ensure these simplifications (LN, 2011).

In October 2011, the Commission first presented its legislative proposals for the upcoming CAP reform. Although simplification was explicitly mentioned in the proposals, the effects for the paying agencies were at a minimum, especially on the short term (Van EK, personal communication, 2016; European Commission, 2011).

The LN was able to come up with a timely response to the first legislative proposal, as implementing agencies in the CAP are very well informed through informal networks and connections about the political agenda for upcoming reforms (Van Ek, personal communication, 2016; Oele, personal communication, 2015). So, in November 2011 the LN raised a number of key issues in response to the first legislative proposals. These issues were raised in special discussion papers, so called non-papers. Three important, and recurring themes in these non-papers were the time path for implementation, the new elements of Cross Compliance and On-The-Spot- Controls (OTSC) (LN, 2012d), and the effects of greening (LN, 2012b).

The non-paper about the time-path for implementation particularly raises issues concerning a proper understanding of the new policy instruments, and the adjustment of mutual expectations. OTSC and Cross Compliance were already part of the existing CAP legislation on the eligibility of farmers for receiving CAP funds. Hence the suggestions here were based on actual problems with the current system.
Greening was clearly a new element of the CAP, for which farmers would have to comply with certain ecological measures in order to receive all the funds they can be entitled to. This comes with a new system for checking the eligibility of farmers. The LN suggested that only measures should be introduced which would fit the existing system for monitoring farmer eligibility.

In these papers, the main argumentation was based on raising awareness for technical issues that need to be dealt with in the formulation of the policy instruments in the new CAP, in order to keep the implementation costs manageable. Moreover, the aim clearly was: “to bring down the administrative, financial, and control burdens to an acceptable level for all actors involved” (LN, 2012b).

For the implementing agencies, a reduction in OTSC was seen as one of the core points that needed to change in order to improve the practicability of the CAP (Van Ek, personal communication, 2016). The Commission thought otherwise, and deemed the presented ideas too unconstructive to work with. According to the Commission the emphasis was too much on the rejection of the current system of OTSC, instead of a practical solution for future developments (EC, 2012). The secretary of the LN, however, indicated that a reduction of the OTSC was at the bottom of the priority list of the Commission (Van Ek, personal communication, 2016).

Overall, the Commission was interested in the ideas that the LN had to offer. Following the non-papers, the Commission officially confirmed that it considers it is useful to receive input from the Learning Network throughout the reform process “as they [the paying agencies] are the ones that will have to implement the reform in practice” (European Commission, 2012). In this regard, the Commission expressed explicitly the sort of information which they were especially interested in to receive from the LN:

- Difficulties for paying agencies.
- Relationship between paying agencies and member state decision makers.
- The political process and potential difficulties toward the end result.
- Expected duration of implementation.

Based on these communications with the Commission, the LN was provided with an initial idea of the type of information that was demanded throughout the reform process. Furthermore, the interaction between the Commission and the LN in this stage of policy formulation was typified by a large number of questions about the interpretation of how certain policy features were drafted (e.g. LN, 2012a; MORE). Particularly regarding the new policy instruments introduced with the greening measures many issues had to be clarified.
Later, the LN was more aware of what sort of information the Commission was interested in, moreover, the Commission clearly demanded particular input from the LN, especially concerning potential problems with the new greening measures. In order to fulfill these demands, the LN organized a survey amongst its members in order to make an impact assessment based on experiences with the current Cross Compliance system.

Still, a problem from the Commission and DG AGRI with the information from the LN is that “a lot of effort has gone into identifying problems, but it remains to find practical and realistic solutions to these problems” (European Commission, 2012).

In the further communications between the LN, and representatives from the Commission and DG AGRI the topics of Cross Compliance, OTSC, timely implementation, and greening all kept passing the review, despite the lack of willingness from the Commission to take serious measures concerning a reduction of OTSC and the accessory error margins (Van Ek, personal communication, 2016).

However, based on the minutes from meetings during the period between mid 2012 and mid 2013, most emphasis was put on the new greening measures, and in particular the expected implementation problems. During this period, up to the final drafting of the official acts, the Commission clearly recognized the view from the LN that implementing the new greening measures would bring an enormous amount of difficulties, as it kept asking for more input on this topic (LN, 2013b). Especially the controllability of the new measures was a key theme. According to the LN, adding the green measures to the existing system would take too many costs and efforts from the domestic paying agencies (LN, 2013b). The Commission appeared to show less interest in the other themes.

**The aftermath**

Most information presented by the LN during the reform process was very technical. Especially in the initial stages they also emphasized potential costs for certain policy choices they disagreed with. Still, the instrumental use of the information presented by the LN was remarkably limited. Despite all the interaction and communications, the outcome of the 2013 CAP reform showed little evidence for influence from the LN. The control costs of the new CAP even increased from roughly three to roughly four billion Euros per year, while the LN stressed the necessity of a decrease of these costs (SOURCE CAP WEBSITE COMMISSION). Furthermore, the paying agencies still expected a large number of difficulties with the implementation of these new instruments (Van Ek, personal communication, 2016). What did not help LN’s cause was the position of the departing Commissioner
of Agriculture and Fisheries, Ciolos, who appeared to want to make the introduction of greening part of his policy legacy (Van Ek, 2016; Oele, 2015).

Using the information from the LN for political gains was highly unlikely in the first place. Mainly because of the technicality of the information, and second because, taking perspectives from other societal groups, such as environmentalists, consumers and farmers were likely to be much more attractive for political gains. As a result, what was left of simplification was particularly aimed at reducing the administrative burdens for farmers, not implementing agencies. To illustrate the lack of conceptual or political value of the LN, no records were found in which the Commission referred to their interaction with the LN for improving the practicability of their legislation, or simplification.

Still, minor instrumental successes were achieved. For example the removal of certain landscape elements from the greening measures through the delegated and implementing acts announced in 2014 were received as a modest achievement (Oele, personal communication, 2015). Another outcome in the aftermath of the 2013 CAP reform proved to be small victories for the LN. Based on the discussions with the LN, the Commission realized that too many adjustments to the existing implementation methods had to be made, so that they postponed the implementation deadline for the reformed CAP (Van Ek, 2016; Oele, 2015).

With these decisions, the Commission showed that they regard implementation and practicability as important issues, without making too many concessions in the actual legal acts, and defending these issues in negotiations with the Parliament and Council. It is highly likely that the accumulation of technical difficulties raised the awareness that something had to be done, such as postponing the implementation deadline.

**Conclusion and discussion**

This paper has looked at the role of implementation experiences from implementing agencies in CAP policy reforms. Particular attention was paid to the mobilization of these experiences. As a result, the analysis has shown that, implementing agencies have created a new channel for interaction with the Commission and DG AGRI, in order to use their experiential knowledge for lobbying purposes. Moreover, contrary to expectations, the implementing agencies in the CAP did not limit the presentation of their ideas to those which were particularly sought after by the Commission. The domestic implementing agencies in the CAP have shown to be particularly driven in their attempts to affect the latest CAP reform. They did this mainly by continuously feeding the Commission and DG AGRI with input from papers and self-conducted studies. They used their
experience not only to raise awareness for existing issues, but also to warn the Commission for upcoming implementation related difficulties.

The main focus on this paper has been on the activities of the LN, however, this comes with an inherent focus on the similarities in interests between the different implementing agencies. Because there are 28 member states, there are also a more diverging experiences and ideas about the CAP amongst the domestic implanting agencies (cf. Héritier, 1996). Moreover, the study has limited itself to input from representatives from the Dutch CAP implementing agency RVO, and DG AGRI employees. Further research should, and will, also include interviews with representatives from other member states.

It is also important to notice that implementing agencies, of course, are not the only actors trying to influence CAP reforms. Beside the actors officially involved in the EU policy process, other groups, such as farmer organizations, are also attempting to maximize their influence. In order to better understand the role of implementing agencies in such reform processes, it will be interesting to study how these different actors are aligned, and whether overlapping interest might lead them to forge coalitions.

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