

## Administrative Culture in the European Commission: the case of competition and environment

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### Introduction

Administrative culture has often been overlooked by researchers attempting to explain the role of institutions in a political context. This is perhaps not so surprising given that the cultural aspects of the organization have traditionally been the preserve of industrial sociologists, especially those prescribing improvements in management techniques. Where it has been used, the notion of a departmental or administrative culture has often suffered from certain vagueness. Indeed, the notion of culture more generally, has been notoriously difficult to define (Gellner, 1983: 7). But if we are seeking an explanatory role for this metaphor, with the aim of helping us to understand better the institution which is the focus of our study, we find that we do not have at our disposal any accepted framework for analysis. As a result, accounts given of administrative culture tend to be impressionistic and unfocused. Yet, it has been suggested that in the case of the European Commission, something that may be given the label 'culture' has indeed played an important role in determining the activism and effectiveness of the institution or of its component parts (Cini, 1994). Although it is accepted that culture is not the only variable at work here, it is certainly a dimension of institutional life that ought not to be ignored.

This paper seeks to explore how the concept of administrative culture might be used to help us to understand better the internal dynamics of the European Commission. It does this, in part, from the perspective of two comparable though very different case studies. In the case of Directorate-General Four (DG IV) of the Commission, which administers the Community's anti-trust/competition and state aid control, it is possible to identify a distinctive set of beliefs linked to a commitment to neo-liberal values and a legalistic way of working. By contrast, Directorate-General Eleven (DG XI), the environment DG, has adopted a very specific world view based on the relationship between trade and ecological concerns. However, before looking specifically at these individual examples, this paper tentatively suggests ways in which administrative culture might be defined and used to explain certain elements of life within an institutional setting.

### PART ONE: CULTURE WITHIN THE INSTITUTION

Administrative Culture: problems of definition

Politics is often thought of as a rather parasitic academic discipline. This is understandable, as political discourse often attaches itself to and 'steals' from a broad range of conceptual and methodological traditions. The use made of anthropological notions of culture is one such example. There is a fairly long history here, with research on political culture going back to Almond and Verba's *The Civic Culture* (1963) and beyond. The application of a cultural approach to the study of organizational and institutional politics is not so well established however, although there is of course a substantial literature on organizational culture in the business administration and industrial sociology fields.

The fact that management experts and organizational theorists have been largely prescriptive in their approach to culture<sup>1</sup> has profound implications when we come to look for guidance in applying the concept to an institution such as the European Commission. For a start, we find that there has been a tendency within the literature to focus on the creation of quasi-scientific laws. Thus, emphasis is placed (at least in the less theoretical literature) on creating cultures conducive to the goals of the organization. It is hardly surprising, given the spread of private sector thinking into the public domain, that such notions should spread to public sector organizations such as the European Commission.<sup>2</sup>

Many would argue that the use of any notion of culture to explore institutional contexts is bound to be unsatisfactory, and as a result should best be avoided. It is certainly true that there are other, perhaps more easily definable concepts that can be used in its place. But the fact that there is no accepted definition<sup>3</sup> is not an insurmountable problem, as long as we manage to avoid certain pitfalls. Part of the difficulty has been that the word culture has tended to be used in a rather woolly manner, without any definition at all. This is a rather strange phenomenon given that political scientists usually thrive on defining their terms before launching into any sort of analysis. Nevertheless, culture, undefined and supposedly speaking for itself, pops up all over the place.

When used in this manner, culture usually refers to a certain feeling or atmosphere within an institution. Where definitions are attempted, by contrast, they are very often explicitly linked to methodological questions. For example, there may be an assumption that in order to understand culture, one needs to understand the attitudes of those who work within an institution (Coombes, 1970). By contrast, there may be references to certain behavioural aspects of institutional life, which, when explained, open the door to an understanding of the term (Linstead and Grafton-Small, 1992). These are not really definitions of course, but they do help to highlight a second major difficulty with the concept of administrative culture; that of how to do empirical research in the area.

It is not surprising that this question should arise early on. For without an adequate methodology, we are somewhat lost. Methodological approaches will invariably depend on our objectives. So we need, first of all, to pose the question 'how do we want to use the notion of administrative culture?'. Some recent work on culture in the international relations field has focused on the concept as something through which to investigate the world, rather than as a worthy focus of research in its own right (Rengger, 1992). However, even if we are only hoping to use the notion of administrative culture as a heuristic device, we may wish to follow a more conventional explanatory approach. If this is the case, we need some way of being able to identify administrative culture. Without a definition this is impossible. We have therefore come full circle.

#### A Conceptual Framework for understanding culture within institutional settings

Having posed very briefly some of the problems faced in applying the concept of administrative culture to our institution, cards now have to be laid on the table. A starting point therefore is a rejection of catch-all definitions, that seek to make administrative culture synonymous with the institution. There is perhaps something appealing about this approach, but it is rejected partly on the grounds that it is counter-intuitive, but also because it is methodologically suspect.<sup>4</sup> A much narrower definition is preferred, therefore. This will rest on an assumption - that it is culture that gives meaning

to human actions, to the extent that culture amounts to a '...shared set of normative understandings of the world...' (Rengger, 1992: 97) or a '...system of ideas and signs and associations and ways of behaving and communicating; (Gellner, 1983: 7). As a result, our methodological approach would involve some sort of investigation of belief systems, shared values and institutional ideology, alongside an assessment of the myths, symbols and norms that pervade the institution.

Schein has approached the notion of administrative culture from a similar perspective. In his book on *Culture and Leadership* (1986), he makes a clear-cut distinction between administrative culture per se and certain aspects of institutional life which would enlighten us about the nature of administrative culture. His methodology rests on an identification of the 'basic assumptions' that institutional actors adhere to, and as such, seems to suggest that he too favours a narrow definition of the term. However, there is a problem when it comes to how one might uncover these basic assumptions. For this is achieved through the medium of what Schein calls the 'attributes' of an institution, that is, those elements that affect the way in which work is perceived and undertaken.<sup>5</sup> So, while the definition may be narrow, the methodology is anything but.

Our search for an adequate methodological basis requires the use of some sort of conceptual framework. Here, Allaire and Firsirotu's article on theories of organizational culture is invaluable, as it provides, ready-made as it were, all the elements we have been looking for in the paragraphs above (Allaire and Firsirotu, 1984). Allaire and Firsirotu were writing specifically from an organization theory perspective. Their aim was to shed light on '...the processes of decay, adaptation and radical change in complex organizations' by making use of the notion of organizational culture (p 193). For this purpose, they constructed a model which seeks to place the cultural aspects of the organization centre-stage. It is worthwhile rehearsing some of the key elements within their framework, as this will help us to situate our definition of administrative culture in a broader organizational/institutional context.

According to Allaire and Firsirotu's model, the cultural system of an organization is one of three inter-related components, the other two being what they call 'the sociostructural system' and the 'individual actors'. Their account of the cultural element is worth quoting in full:

...a cultural system...embodies the organization's expressive and affective dimensions in a system of shared and meaningful symbols manifested in myths, ideology and values and in multiple cultural artefacts (rites, rituals and customs; metaphors, glossaries, acronyms, lexicon and slogans; sagas, stories, legends and organizational lore; logos, design, architecture). This cultural system is shaped by ambient society, the history of the organization and the particular contingency factors impinging upon it; it changes and evolves under the influence of contemporary dominant actors and the dynamic interplay between cultural and structural elements (Allaire and Firsirotu, 1984: 213).

This is then expanded upon through a more detailed analysis of the three central components of the cultural system: myth, which they see as providing '...tenacious and affective links between a valued, often glorified, past and contemporary reality, bestowing legitimacy and normalcy upon present actions and modes of organization'; ideology, which is a '...unified and symbolic system of beliefs which provide encompassing, compelling, often mythical, explanations of social reality...'; and values, which are the constitutive parts, as well as the tangible expressions of an ideology (Allaire and Firsirotu, 1984: 215).

What is interesting in this framework is that the cultural system exists alongside the structural/procedural and individual/leadership elements that together comprise what is deemed to be a complex organization. It is through an assessment of the inter-relationship between all three aspects of organizational life that the organization is understood. As such, the cultural dimension is seen as crucial in understanding both how the organization functions internally and how it relates to its external environment. As Allaire and Firsirotu put it, organizations are '...at once, social creations and creators of social meaning' (p. 216). It is in both senses that we seek to understand administrative culture within the European Commission.

## Administrative Culture and the 'New Institutionalism'

The context in which this paper has been written is a broad one. It rests upon a desire not only to understand the European Commission, but also its place and its role within the European policy process. Of course, administrative culture may not help us to do this. There are certainly some who see policy-making at the European level more usefully explained through other concepts and devices. Smith, for example, prefers the notion of policy style to that of administrative culture, as he seeks to explain the differences between individual directorates-general within the Commission<sup>6</sup> (Smith, 1995: 462-4). However, the importance of such aspects as ideology, belief systems, values, myths, symbols and so on, should not be ignored if our purpose is to dig deep methodologically. The link between culture and the policy process is not an easy one to fathom, though there are hints that it may provide a worthwhile line of enquiry. Sabatier, for example, seems implicitly to suggest a causal link between culture and policy, when he argues that if one wishes to alter policy approaches, one needs first to alter basic values (Sabatier, 1987). Weale, too, seems to agree that it is impossible to understand developments in public policy without uncovering the belief systems that lie at the heart of the policy process (1991: 3). This is fundamental, although he is right to point out that we must be careful not to assume any direct and simplistic causal relationship between belief systems and policy outcomes. This point ought to be remembered, as it is all too easy to make facile 'leaps of faith' when seeking to explain matters of policy.

Administrative culture is of course only one of many conceptual lenses through which to understand the workings of the Commission. Although there is no assumption that it will offer a complete and comprehensive explanation of how the institution functions, it is nevertheless a starting-point for developing an awareness of how individuals, collectively, give meaning to what they are; where they are; and what they do. The context within which these actors (Commission officials in our case) exist, is an institutional one. It is therefore crucial that our conception and definition of culture is located clearly within the framework of the institution, the European Commission.

The approach of the so-called 'new institutionalists' is helpful here, in that it focuses our attention upon the institution, and makes suggestions as to how the institution might affect policy content and policy outcomes. In rejecting the descriptive, historical institutionalism of the past, the new institutionalists seek to redress what they consider to be a behavioural imbalance. As such, emphasis is placed on the institution both as a political actor in its own right, and as an arena within which political activity occurs. In this sense, institutions are something more than instrumental organizations or sets of organizations. Their role goes beyond that of being simply tools of political players, and as such, they are deserving of more attention from political scientists (March and Olsen, 1989).

Critiques of new institutionalist thinking tend to argue that the new institutionalists overstate their case, and place too much emphasis on the institutional context as an explanatory device accounting for all policy outcomes. It is clear however that new institutionalists see the institution as only one amongst many elements influencing the policy process. A more substantial criticism however may be that the school assumes a certain inevitability. In other words, it suggests some form of causal relationship between institutions and outcomes, without recognising the external influences that mould and shape the institution, and the complexity of the relationships within it.

Bulmer is a recent proponent of a new institutionalist approach applied to the European Union (Bulmer, 1994). Using the case of merger control, for example, he sought to explore how institutional characteristics define decisional processes (p 425). He agrees therefore with the basic and rather uncontroversial assumption that institutions matter, without overstating their importance. As such, he notes that 'Political struggles are mediated by institutional arrangements'(p 424). Peters, who also uses this approach in an EU context, puts more weight on the limits of the institutional perspective, claiming that institutions '...only establish the bounds within which individuals and groups function' (Peters, 1991: 122). He is clearly prepared to acknowledge, however, that if intended policy outcomes are to be achieved, the actions of individual actors must be considered within an institutional framework (Peters, 1991: 106).

It is worth emphasising the importance of European institutions in determining, to some extent at least, policy outcomes. Indeed, Peterson has noted that the relationship between policy formulation and policy outcomes has often been neglected (Peterson, 1995). However, the nature of that relationship must be complex though it is beyond the scope of this paper to take this matter further. At the very least, however, we may assume that this relationship has serious implications for policy-making and for the European integration process more generally (Cram, 1994: 195). Thus, when it is argued that that the architecture of the EU's institutions loads the policy process (Peterson, 1995: 84), we are assuming that that architecture includes a cultural as well a structural dimension.

However, the new institutionalists seem to see administrative culture as only one of many institutional variables. For example, Bulmer quotes March and Olsen in stating that embedded within institutional settings are '...beliefs, paradigms, codes, cultures and knowledge...' (Bulmer, 1994; 425). Administrative culture is, however, more than just one in a list of a large number of variables. It is what underpins all activity within the institution, creating a foundation of shared meaning, interpretation and values upon which all institutional activity rests. Administrative culture, alone, does not explain policy formulation, policy content or indeed policy outcomes; neither does it explain all aspects of institutional life. But it does help us to understand more fully why institutions do the things they do. For this alone, it is worthy of further attention.

## PART TWO: THE EUROPEAN COMMISSION AND ITS ADMINISTRATIVE CULTURE

### Administrative Culture in the European Commission (or a 'Commission culture'?)

Over the past decade, the European Commission has been subject to an interesting process of centralization. The process has been interesting to the extent that it has occurred with little impact on formal structures. Much of the responsibility for these changes has lain with Jacques Delors. He was aware that the Commission would only be able to play an activist role externally, within the broader process of European integration, if internally, administrative wheels were well oiled. Institutional reform takes time, and previous efforts had barely ever got past the report-making stage. Although there had, for a long time, been a widespread recognition that reform was needed, there seemed to be little political will for it when Commission priorities were being set.

In sidetracking the issue of major reform, Delors and his chef de cabinet, Pascal Lamy, undertook to resolve the Commission's organizational problems as quickly as possible. How this was achieved has been dealt with admirably elsewhere (see Ross, 1994 in particular; see also Grant, 1994). Suffice to say that by centralizing control, through the presidentialisation of the Commission; through the creation of new and alternative (and often informal) channels of communication; and through sheer hard work and commitment on the part of the Delors cabinet, it was possible, albeit temporarily, to side-step some of the difficulties identified.

The overarching problem that faced Delors and his cabinet was a product of the independence of the Commission's component parts, the directorates-general. This was far from being a recent development however. As far back as 1970, Coombes was labelling the Commission a '...porous organization...in which different styles of administration and different normative approaches compete for domination...' (Coombes, 1970: 291). He took this even further by noting that at the top of the Commission hierarchy '...the preservation of collegiality has come to involve reconciling different norms by a process of internal politics' (p 254). The theme of fragmentation or 'compartmentalisation' (Sasse, 1977) is well-established in the albeit sparse literature on the European Commission. In any case, there is nothing new in claiming that sections, divisions, or directorates within institutions often come to develop their own independent identity within a broader institutional framework. Peters, for example, acknowledges the work of Allison (1971) and Downs (1967) in this regard. He goes on to suggest ways in which quasi-autonomous actors of this sort are able to pursue their own policy (purposive) or institutional (reflexive) objectives through the policy process (Peters, 1991: 115-6). As

such, there is an assumption here that the identity of these sub-units relates closely to their functional responsibilities. Certainly, the policy administered within individual directorates-general is important in determining what Cram, amongst others, has called the 'policy style' or 'administrative style' of the DG (Cram, 1994: 201). Mazey and Richardson, and Donnelly (1993: chapter 14 and chapter 7 respectively) also use this term to make distinctions between different parts of the Commission. As Donnelly puts it, 'The wide range of executive, supervisory and legislative functions carried out by the different services inevitably lead to differing administrative styles' (Donnelly, 1993: 77).

It is now fairly conventional to consider the Commission as a 'multi-organization' (Cram, 1994) or as a 'set of institutions' (Cini, 1994), rather than as a monolithic unit. Peterson takes this notion further by adding shades of the new institutionalism, when he characterises the Commission as a political system in its own right, rather than as a single minded actor (Peterson, 1995: 24). It should come as no surprise therefore that directorates-general within the Commission should have their own policy style, their own ways of working, and their own policy and organizational objectives. In addition, DGs tend to be protective of what they consider to be their own sphere of policy influence, in some cases even seeking to 'steal' policy competences from elsewhere in the Commission. Demarcation disputes are not uncommon.

If we are looking for a level of analysis at which to explore the administrative culture of the Commission, it would seem to make sense to look specifically within the DGs, although there may also be a case to be made for looking to the Commission or even to the European level as well. This level of analysis question raises a broader issue, however. For it is not altogether clear whether we are looking for a specific Commission (or DG) culture, or, more generally, for a variety of cultures that exist within the Commission. The distinction is not merely an academic one. It gets to the heart of whether there is indeed such a thing as administrative (Commission or DG) culture, or whether what we are really talking about is the effect of cultures brought into an institutional setting from elsewhere.

Bellier (1985: 50) tackles some of these questions, and seems to come down clearly on the side of the latter perspective, with little to suggest any acceptance of an administrative culture associated specifically with the Commission. Bellier sees tension within the Commission arising from the juxtaposition of an embryonic European identity and national cultures. This, she believes, is a potential barrier to further European integration. Her focus is therefore much more on the influence of national, linguistic, administrative and political cultures upon the Commission, and not on whether there is a distinctive administrative culture of the Commission or DG.

It is undoubtedly true that national divisions within the Commission remain important. This is not however the focus of this particular paper. Bellier is much nearer to our perspective when she stresses the autonomy and identity of DGs (Bellier, 1995: 54-5). Here she states that DG identity rests upon the substance of DG activity, the personality of its leaders and professional relations within the policy area concerned. This identity can be uncovered, therefore, by focusing upon differences that exist between DGs (Bellier, 1995: 55). There is no explicit suggestion by Bellier, however, that what this amounts to is a distinctive administrative culture at DG level. It is nevertheless this suggestion that is taken up in the two sections that follow. The objective here is to provide empirical evidence that will hopefully help us to reach some relevant conclusions about the Commission's administrative culture(s).

#### DG IV of the Commission: the case of competition

If we are seeking to identify the differences between individual DGs, it would be difficult to find a better example than that of DG IV. Here is a case in which the very nature of the policy, and the extraordinary legal provisions that govern it, seem to dictate the DG's identity. DG IV administers the Commission's competition (anti-trust, cartel and merger policies) and state aid policy.<sup>7</sup> The legal bases for these policies give the DG IV officials a rare autonomy and discretion in the adoption of

individual Commission decisions. These are directed either to firms in breach of the competition rules, or to member states acting contrary to the state aid regime.

Aside from the legal framework, it could be said that the very nature of competition policy itself shapes some of the basic assumptions under which DG IV officials work. The most obvious example of this is that there is, within DG IV, an underlying assumption that competition is a good thing. This may seem fairly innocuous, but behind it are other assumptions (not unfamiliar to Adam Smith) about the predilections of firms (and states) when faced with potential competition. So while competition is generally viewed positively, industry and national governments are viewed primarily with suspicion. This is no doubt important, given the policing role that the DG staff must perform.

The organizational history of the DG is also important for establishing the context within which DG IV officials act. In spite of the extensive powers given to DG IV staff between 1957 and 1962, little use was made of them until the early 1980s. Perhaps we should not be too surprised at this, given that competition policy, as a complement of the common market, was relatively meaningless without a single market to police. Likewise, DG IV was not seen as a prestigious portfolio for any ambitious commissioner until well into the 1980s. As a result, DG IV leaders rarely left a lasting impression, until Peter Sutherland's appointment in 1985 (or perhaps even Frans Andriessen's, from 1981).

The ascendancy of neo-liberal thinking over the course of the 1980s, along with the establishment of the single market programme, coincided with recognition within the Commission and at member state level that competition matters were important. DG IV, as an institution, was to benefit from this. What is more difficult to ascertain is the extent to which DG IV itself was able to influence the spread of this neo-liberal ethos (Cini, 1994). It is clear that if DG IV was to have any impact upon its environment, it would have to have an influence beyond its size. With its 200-odd 'A' grade (administrative) staff, DG IV could not react to every abuse of competition. Its work, therefore, was as much in defining how firms and governments should behave, that is, establishing the 'rules of the game', as it was in chasing up and prioritising breaches of those rules. Ultimately, therefore, a large part of DG IV's policy concerns the shaping, administering and indeed the creation of markets through a mixture of deterrence, coercion and encouragement.

This does not imply, however, that DG IV's policy objectives were clear-cut. Although staff were keen to stress the compatibility of competition/state aid policy with the European integration process, there are of course times when a negative approach to integration does not suffice. In any case, competition policy at the European level is more than a just a market-creating policy. Policies do not stand in isolation to one another. Policy-makers and administrators dealing with competition policy have come under a great deal of pressure to allow their policies to be used for a wide variety of ends. For DG IV, the main source of tension lay in whether the policy should be used to serve pro-competition or pro-competitiveness objective. The latter often implied that DG IV staff exempt or turn a blind eye to practices that were essentially anti-competitive. The treaties allow for this, in the very fact that exemption clauses were written into the competition provisions. But it still raises questions about the extent of administrative discretion.

Although the framework for a European-level competition policy was established both in the Treaties and in subsequent secondary legislation, much of DG IV's present policy rests on the adoption of individual Commission decisions. These decisions are taken under an implementing authority delegated from the Council of Ministers. Although the European Court of Justice has the right of review, the Commission nevertheless has a substantial measure of administrative discretion in applying the competition rules. In holding a virtual monopoly of information on the cases it deals with, DG IV is in a strong position vis-a-vis other DGs. Only the Legal Service really has the capacity to challenge the legal argument of DG IV officials. Politically, of course, challenges to the DG IV line are frequent. In the case of state aid policy, the discretion allowed officials is even more far-reaching. This is largely due to the fact that there has never been any secondary Council legislation in this area. As such, all substantive and procedural elements come either from the Treaties or from Commission decisions.

The autonomy that comes from wielding administrative discretion of this sort has helped, over the last decade or more, to highlight DG IV's distinctiveness vis-a-vis other Commission DGs. This is not simply an image of the DG presented externally; it also reflects the self-perception of officials within DG IV. Much has been made of the iconoclasm and missionary zeal of DG IV officials (Wilks and Cini, 1991, for example), though this is not as evident in the mid 1990s as it was at the end of the last decade. With morale high and DG IV officials repeatedly taking an activist approach to the administration of their policy, it was, at this time, interesting that the ideological foundations of the policy and the rhetoric that invariably went with it were much talked of.

Interviews and a period of participant-observation within DG IV have suggested a number of elements that went to make up what might be labelled a DG IV culture. The central component has already been mentioned: a commitment to both free and fair competition, which manifested itself in a powerful laissez-faire rhetoric, that in fact went far beyond DG IV practice. The language used to define interventionist or anti-competitive acts was almost biblical, in the sense that images of 'evil' firms, or 'good' governments simplified an extremely complex process of analysis. The biblical imagery continues, and as Wilks has pointed out on several occasions, it contains a 'missionary' element. This is very much linked to the point made above that there exists amongst officials a shared commitment to the spread of DG IV-values, not only within the European Union, but also globally (Cini, 1994). Other basic values identifiable within DG IV are related to the predominance of lawyers (and of a legal culture) within the DG, working practices that endow a large degree of autonomy in individual officials (the rapporteurs), and an almost blind acceptance that the powers of DG IV (and their planned extension) are beyond challenge.

If we are identifying these elements as amongst those that make up a DG IV culture, we are left pondering the extent to which the 'culture' was merely a product of the neo-liberal environment prevalent over the 1980s. This raises once again questions about the relationship between institutional (or cultural) factors and policy outcomes/external contexts. And once again it is safe to warn against simplistic causal explanations at this point.

#### DG XI of the Commission: the case of the environment

The DG XI case is, not surprisingly, somewhat different from that of DG IV. DG XI formulates and administers the Community's environment policy. Like DG IV however, its internal dynamics and its relationship with other Commission and EU actors has largely been conditioned by its functional responsibilities. Indeed, this began early in the institution's history. Normally when a DG is established, most of the recruitment takes place from within the Commission. When DG XI was set up in the late 1960s however, environmentalists rather than Commission officials were appointed. One senior official commented that from the very start this gave the DG a reputation for being dominated by what he called 'ecological freaks' (Interview, 1993).

A sense of difference was therefore instilled within DG XI staff from the beginning. Environment officials exacerbated their position within the Commission by giving the impression that they were working in some sort of a political vacuum. The drafting of legislation went on behind closed doors without, apparently, much regard for policy being made elsewhere in the Commission. Even NGOs seemed to be excluded. As a result, DG XI officials produced, in a very short space of time, a huge amount of legislation - 12 000 pages of it according to one estimate (Interview, 1993). This legislation was however little influenced by policy objectives outside the boundaries of DG XI. The fact that those who would have to implement the policy had not been involved at the formulation stage, meant that the policy was often considered unworkable and utopian by those at grass roots level (Interview, 1993).<sup>8</sup>

DG XI has generally been considered a weak DG within the Commission. Its inability to win arguments or to have its priorities turned into Community priorities provided ample evidence of its marginal nature. The size of the DG tells us something about its political weight. Even by the middle



of the 1980s there was still only around 50-60 officials (although it has grown enormously since then). In addition, commissioners responsible for environmental matters had not been especially adept at advancing the DG's cause. Its particularly technical focus and what seemed to be a disregard for the political dimension of the policy did not help to raise the profile of the DG from that of a 'minor league player' (Weale and Williams, 1993).

Leadership was crucial in initiating a new DG XI era. The appointment of Brinkhorst as director-general and Ripa de Meana as commissioner both marked a sea-change. Recognition that DG XI was, to some extent at least, its own worst enemy, has led to a practical, top-down policy of integrating environmental concerns into other Commission policies. At the same time, changes within the DG itself were also planned. One element involved countering the DG's inherent bias towards policy formulation, in order to tackle the problem of the so-called 'implementation deficit'. Another element involved a politicisation of the work of the DG, so as to make the technical content of legislation more policy relevant (Weale and Williams, 1993). The Fifth Action Programme has been crucial here (Commission, 1992). Alongside other reports on environment policy (see for example the Task Force Report of 1989), it began to look as though this was a concerted attempt to react against the marginalisation of the DG and its policy. By demonstrating more clearly its relationship and indeed its compatibility with other policy sectors, DG XI was dragged into the mainstream (which effectively meant the single market). Whereas in the past, policy-making on the environment had been seen as something of a battleground, single market and environmental concerns were now said to be running in the same direction. Sustainable development had found favour at the top of the Commission hierarchy. In addition, and perhaps in Delors' case more importantly, an explicit link made between high environmental standards and job opportunities helped to focus attention on DG XI. With Delors' interest in employment matters coming to a head in 1993 (Commission, 1993), and with his personal involvement in the Rio Earth Summit of 1992, the environment was pushed a little nearer to the top of the Commission agenda.<sup>9</sup>

One reason why the DG XI case study is very different from that of DG IV is that here we find a conscious attempt by administrative elites within the Commission to alter the underlying ideology of the DG. One official went as far as to say that there had been a concerted effort to change the culture of the DG (Interview, 1993). What this amounted to then was an attempt to go beyond structural and procedural change (although these too were important elements within the Fifth Action Programme), to alter the underlying rationale of and justification for the policy. An understanding of the concept of ecological modernisation lies at the heart of this change.

What Weale, amongst others, has labelled 'ecological modernisation' was introduced gradually into DG XI thinking. This occurred, first of all, at the level of official documentation. Subsequently, changes were felt at a more basic level, a level that would affect the process of policy formulation. Weale has argued that the 'ideology' of ecological modernisation became prevalent within the belief system of policy elites over the course of the 1980s. This, he claims, is particularly important in the field of environmental policy-making, largely as a result of the importance of professional expertise in this area (Weale, 1991: 4). He defines this set of beliefs as:

...a series of views about the relationship between the economy, society and public policy...its central proposition is contained in the claim that environmental protection should not be regarded as a burden upon the economy but as a precondition for future sustainable growth (Weale, 1991).

In the European Community context, the notion that in future, those with the highest environmental standards will set the level of 'product acceptability', is key here. There is, in addition, a general awareness that the pollution control of the 1970s failed. The implications of the adoption of such a system of beliefs for DG XI and its policy, is clear. It implies the need for a process of integration of environmental concerns into other policy areas; it requires much more of a precautionary approach to policy formulation; and it means that a more sophisticated understanding of the relationship between a range of public policy objectives must be developed.

However, it is all very well identifying an 'ideology' of ecological modernisation within the official documentation; what is not so visible is the extent to which elites have really succeeded in replacing what appeared to be a rather simplistic set of morally founded ecological beliefs with a much more complex belief system. Certainly, if interviews are an acceptable source of reference here, DG XI staff seem to have accepted the new regime.<sup>10</sup> It is interesting to note that, by contrast, attitudes towards and expectations of DG XI from outside the DG have not altered. As one DG VII (transport) official commented: '...what DG XI write on paper has very little to do with the real world. They are not living in the real world. They simplify issues and are optimistic' (Interview, 1993). It would certainly take time for this official to be convinced of any deep-seated change in the basic assumptions and beliefs prevalent within DG XI.

## CONCLUSIONS

Although Allaire and Firsirotu's model helped to provide us with a useful definition of administrative culture, problems of methodology persist. So even if agreement can be reached on what administrative culture is, approaches to identifying it remain rather whimsical. The examples of DG XI and DG IV, given above, suggest that there may indeed be something that we can respectably label 'culture' here, although the jury is still out on whether this label is of any use to those interested in institutional research. What is clear, however, is that the level of our analysis must begin with the directorate-general.

The distinctive belief systems, ideologies and myths that reside within these institutional settings deserve further attention. From where do these 'cultures' come? Are they purely a synthesis of national administrative and political cultures? Or is there evidence of the emergence of an embryonic European or Commission culture? Although this paper has focused specifically on the directorate-general level, there is no assumption that culture within the Commission is only a matter of listing DGs. Cross-cutting national/regional, linguistic and professional cultures leap out at us whenever we find ourselves face to face with the Commission. It is indeed the very intermingling of these administrative/political/societal cultures that make the Commission such a fertile source of research. Not surprisingly, this paper begs many questions. One of the most obvious concerns the much-mentioned relationship between the institution and policy outcomes. Although there has been no attempt to tackle this problematic here, a potential avenue to be explored further could well involve the linking of a more clearly defined concept of administrative culture to a new institutionalist conception of the role of the institution. If this helps us better to understand the under-researched European Commission and its role in the European policy process, this could be an avenue worth following.

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Note: The interview material in this paper was based on interviews conducted in DG IV in the first half of 1991 and in DG XI in September 1993.