



Policies
to Promote
Sustainable
Consumption
Patterns

EUPOPP Work Package 5
Deliverable 5.3: Options to improve 'policy
transfer'

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1 Background

1.1 Scientific objective

The objective of Work Package 5 is to explore options to enhance sustainable consumption patterns through improving design, implementation and policy transfer of sustainable consumption instruments (see D 5.1, D 5.2, D 5.3).

Previous work packages identified and evaluated 'good practice' sustainable consumption instruments. Task 5.2 particularly aims at exploring options for mainstreaming successful SC policies in different contexts across the EU-27. In order to be able to transfer 'good practice' SC instruments, Task 5.2 serves to identify criteria for successful policy transfer based on existing literature. In a second step, these criteria will be applied to the findings of the in-depth instrument analysis of WP3 (Task 3.2) and WP4 (Task 4.2) in order to elucidate whether generalisable success factors and barriers for policy transfer can be derived for the need areas of food and housing. Another point of analysis is whether, and to what extent, conditions responsible for the success of instruments in one country can be assumed to be 'transferable' to other contexts.

As an extra dimension, a separate paper has been written by BEF that addresses the specific challenges faced by new EU Member States in Central and Eastern Europe when transferring policies. This paper is based on the key criteria discussed in this paper, yet highlights the issues that will need to be specially addressed in the new Member States. A final step for this task will be a discussion on whether the generic transferability criteria identified in Step 1 are applicable in the context of consumption instruments, the impact of which is highly dependent on culturally influenced factors and on the complex interlinkage between consumption, production, distribution and retailing conditions ('systems of provision'). These systems of provision are especially applicable to sustainable consumption instruments, which are a relatively new field, with challenges that are particular to new concepts. Special attention will be paid to the particularities of sustainable consumption as a new policy field, and the specific requirements imposed by the EU context and need areas.

This paper focuses on short, medium and long term goals relating to the creation of new policies. Policy transfer, or the taking of policy from one jurisdiction for application in another, is an integral part of the policy-making context. In this discussion, we will look at the role of policy transfer in three contexts: Member State to Member State, Member State to EU, and EU to Member State. First, we will examine the general concept of a policy transfer.

1.2 Concepts and definitions

A policy transfer is a process by which knowledge about policies and ideas used in one political setting are used in the development of policies in another setting¹. The political setting from which knowledge is extracted can be from the past or present. The

¹ Dolowitz, David & Marsh, David (2000) Learning from Abroad: The Role of Policy Transfer in Contemporary Policy Making. *Governance* 13(1): 5-24.

knowledge to be transferred may concern a broad range of ideas, including administrative arrangements, institutions, ideologies, attitudes and ideas, and negative lessons.² The method used to transfer ideas between political settings, and degree to which they are transferred, can also vary; some may involve direct copying, while others involve amalgamation of ideas, emulation, or motivation.³ For example, if Country A adopts a policy from Country B, the method of transfer will largely depend on the needs of Country A. It can directly copy B's policy, but this is unlikely given the fact that each jurisdiction is different. It is more likely that it will take the policy and adapt it to the needs of Country A.

Policy transfer can be very advantageous to receiving jurisdictions because these jurisdictions can learn and adapt from the experiences of others. Policy transfer always consists of intentional activity; unintentional idea-sharing, such as cultural exchanges, does not qualify as policy transfer.⁴

Transfer can occur across geopolitical scales (vertical transfer), e.g. from the EU to member states, and between countries on the same scale (horizontal transfer). Lower administrative/geopolitical scales are not considered in this work package. Within the project context, classifications may be seen as:

- (1) European – from the EU to Member States and vice versa
- (2) National - between Member States, and

Dywer & Ellison (2009) also report that path dependencies play a role in policy transfer, in that existing arrangements and mechanisms limit the range of different policies to be transferred. This is especially true in the context of the EU because the ability of Member States to freely choose and implement policies in isolation is limited. Moreover, policy transfer cannot be viewed as fundamentally different from other kinds of policy making. Transfer is one of many types of policy making, and can be incorporated and joined with others.

2 Why and when actors engage in policy transfer

Governments and organizations generally use policy transfer when there is a shortage of knowledge or experience on how to fix a problem within their own jurisdiction. One natural response when handling a problem is to look for similar examples in other areas.⁵ When this is undertaken, the process of lesson-drawing occurs. Lesson-drawing, and learning, is the foundation of policy transfer. It is a social and collective process

² Dolowitz, David (1997) British Employment Policy in the 1980's: Learning from the American Experience. *Governance*, 10(1).

³ Dolowitz, David & Marsh, David (1996) Who Learns from Whom: A Review of the Policy Transfer Literature *Political Studies*, 44(2): 343-57.

⁴ Ibid.

⁵ Evans, Mark and Jonathan Davies (1999) Understanding Policy Transfer: A Multi-Level, Multi-Disciplinary Perspective. *Public Administration* Vol. 77, No2, 1999 (361-385).



based on the exchange of ideas between jurisdictions.⁶ In other words, policy transfer and learning occur when policy-makers in one area adjust their understanding of policy development and modify their own policy based on knowledge and learning from other areas.⁷ However, policy transfer is not, by any means, straight-forward. Due to stakeholder interest and involvement, and the many viewpoints of both government and citizens that must be taken into consideration, transfer is a complex process. Though transfer and policy learning occurs, any transfer is largely based on the conditions of the adopting jurisdiction.

Policy transfers are generally more complex than to simply consist of a horizontal transfer between sovereign states; rather, they are often vertical, occurring between states and non-governmental international policy inducers, or entirely non-state actors that reach across national boundaries.⁸ In addition, a single policy transfer can involve a number of jurisdictions—ideas can be simultaneously borrowed from multiple states, and a number of lessons can be extracted. This practice of selective borrowing can often lead to hybridization of policy that draws the best parts from each jurisdiction, and can be tailored to most appropriately fit a particular location and culture. Entire policies do not need to be transferred; rather, any particular mechanism within a policy in one setting may be transferred to another. A policy does not have to be “successful” in its original jurisdiction to be considered for transfer; the lessons learned from a failed, or struggling, policy may also be applied to the policy learning in another jurisdiction.

Drawing on frameworks developed by Stone (2004) and Dolowitz & Marsh (2000), policy transfer processes can be arranged on a continuum ranging from ‘soft’ or ‘voluntary’ to ‘hard’ or ‘coercive’ (Dwyer & Ellison, 2009). An example from the ‘soft’ side of the continuum would be when policy-makers in one country are inspired by policies from other countries, and adapt them to their specific circumstances. An example of a ‘hard’ transfer would be when policies which are directly copied from another country, leading to ‘a more formal and possibly coerced institutionalization’ (Dwyer & Ellison, 2009: 392). In the end, a transfer largely depends on striking the right balance between the involvement of consumers, business, and government, which is discussed below.

Diagram: From lesson drawing to coercive transfer⁹

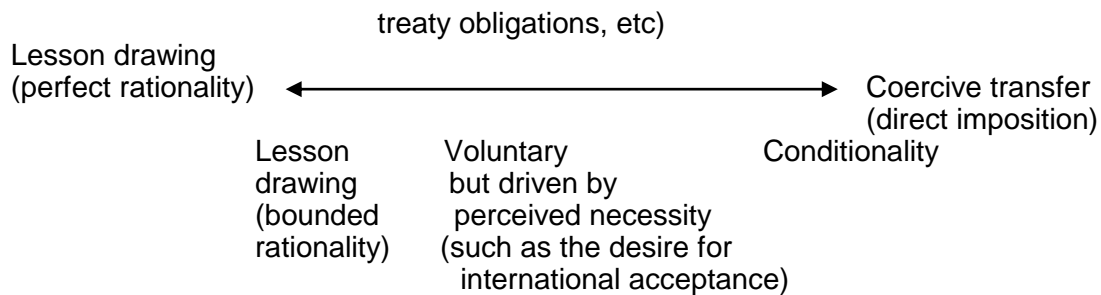
Obligated transfer
(Transfer as a result of

⁶ Knoepfel, Peter and Kissling-Naf, Ingrid (1998) Social Learning in Policy Network. Policy and Politics, 26(3); 343-367.

⁷ Stone, Diane. (2001). Learning Lessons. Policy Transfer and the International Diffusion of Policy Ideas. CSGR Working Paper No. 69/01.

⁸ Ibid.

⁹ Dolowitz, D. with Hulme, R., Nellis, M., and O’Neal, F (2000) Policy Transfer and British Social Policy, Buckingham: Open University Press. p. 13.



Policy transfer can occur in any policy field, and can apply to any instrument. It is a matter of examining the need area and determining where, and how, to use a policy from another jurisdiction. Policy fields, whether well-established or new, can all benefit from policy transfer.

3 Sustainable Consumption as a new policy field

Sustainable consumption is a relatively new field of policy making and, therefore, is subject to special considerations that would not be applicable to older, more established policy fields. For example, the range and maturity of instruments currently in existence in the sustainable consumption field are still limited, making it difficult to produce “best practice” examples. To ascertain the current state of sustainable consumption instruments, an overview of current instruments should first be undertaken. First of all, it is notable that there are relatively few command-and-control instruments focusing directly on consumer behaviour, i.e. the private purchasing and use of goods and services. This is due to at least two reasons: (1) the administrative cost of monitoring compliance with regulations directed at individual consumers is prohibitively high, and (2) consumption occurs largely within the private sphere, the home and the family, where state regulation is perceived of as less legitimate than public life (e.g. Spaargaren and Mol, forthcoming). In recent years, on both the EU and national scales, there is a trend away from command-and-control instruments in the field of environmental policy that might have otherwise encouraged the development of sustainable consumption instruments. However, command-and-control instruments are not the only way to encourage the development of these types of instruments; they are merely one way to achieve this goal. They are used here as an example of the rapidly changing trends in the field.

The existing instruments targeted at consumers are mostly communication-based, such as labels, which are also targeted at brand owners and producers (see section 5.5.7). In addition to subsidies, there are a number of widely propagated economic and fiscal instruments. Examples of these are taxes, resource pricing, tradable certificates, and premiums. They are usually targeted at producers, and influence consumers in an indirect manner, through product pricing. Moreover, there are few procedural instruments directly addressing private consumers and consumer demand. This is an area in which, similar to regulation, it is difficult to negotiate and monitor agreements with large groups of individuals. However, in the field of product policy, there are instruments available to address these issues. Here, however, the choice of instrument can also depend on the specific goals of the policy (see e.g. Schmidt-Bleek 1994).



Tukker et al. (2008a) argue that the burden for change should not be placed solely on 'green' consumers; instead, mutual reinforcement should be supported in the 'triangle of change'. This triangle consists of (1) business, which can be stimulated to improve the efficiency of products through voluntary action, standards, or regulations that set minimum standards. However, businesses generally have limited interest in changing consumption patterns or consumption levels; (2) consumers, who can make sustainable choices when exposed to information and campaigns. However, consumers are largely confined to existing patterns by infrastructure, social norms and habits; and (3) government, which must encourage the availability of sustainable products and choices for consumers, but should also encourage debate and action regarding how to most effectively use markets to achieve equitable and sustainable development. This triangle of change encompasses all aspects that need to be changed, regardless of which "corner" of the triangle it belongs. This includes personal habits, social structure, and economic norms, which are deeply entrenched in society. The triangle also illustrates that the involvement of different stakeholders in every sector of society is important.

Tukker et al. (2008a) also argue that it is important to understand the systemic nature of current consumption patterns. Because personal habits, and the social structures that shape them, are deeply entrenched in society, they recommend an approach that focuses on 'bending trends' from where people are today. Thus, in the short term, it is more sensible not to challenge these values (e.g. consumer sovereignty and personal choice) directly with 'rigid' policy ideas that prescribe consumer choice. In the medium term, however, they suggest policies that aim to promote 'roadmapping and transition management' (i.e. co-operative solutions to create better future infrastructures), and in the long term, they argue that there must be debate challenging current values and paradigms concerning economic growth, well-being and equity. These factors, addressing short versus long term goals, are relevant for policy transfer as they illustrate the goals of a jurisdiction wishing to make a transfer. A jurisdiction must always take into consideration how to create a short, medium, and long-term plan when doing a transfer; for example, it cannot take a policy that is best suited for a long-term plan, and try to implement it in the short term.

Though sustainable consumption is a relatively new area of policy, it is often tightly interwoven with other policy fields, such as energy or land use. In addition, the type of regulation will vary greatly between food and housing, and even within each sector. It is hard to transfer policy if there is limited pre-existing policy in the field because there is little experience on which to base a new policy.

3.1 Issues in the need area of food

Food consumption is closely correlated to lifestyle, quality demands, food competences, health considerations, income, and daily routines. There are also many structural and market factors that affect food consumption, such as availability of alternative food products, and the affordability of these alternatives. Therefore, more sustainable food consumption policies must target multiple areas and, as changing of consumption and lifestyle habits need motivation and knowledge, must consider informational and motivational elements.

3.2 Issues in the need area of housing

In the need area of housing, there are three different aspects regarding sustainable consumption to be considered: household electricity consumption from appliance use; household heating requirements due to building characteristics; and household energy consumption for heating and hot water.

These three consumption aspects must be addressed separately, as they have very different correlations to customer behaviour. For example, appliances are closely connected to everyday life, which is based on routines and use patterns of curtailment behaviour. Most appliances are replaced within 10 years, which relates to so-called investment behaviour with specific implications for change.

In a separate need area of housing, such as heating requirements, housing aspects such as characteristics of the building must be examined. These are determined mainly by the construction of the building, and by major renovation cycles, which typically occur every few decades. The choice and use of heating and hot water systems lies between these two extremes. This is an important aspect for consideration in policy transfer because of time-frame considerations. Instruments relating solely to consumer behaviour can be addressed in the short-term, but instruments addressing replacement of heating systems or renovation of buildings must be incorporated in medium or long-term plans.

4 Key factors for policy transfer

There are a number of important factors that should be examined whenever a policy transfer is considered. Each transfer requires a deep understanding of cultural factors and sensitivities. Policymakers understand that all countries are not the same, and need to take into account a country's history, culture, and institutions. These considerations have been grouped into ten "key factors" that are, essentially, the basic criteria for policy transfer between any two jurisdictions. Transferring policy, regardless of whether it's horizontal or vertical, is a complex process that involves a number of issues, many of which are unique to that specific transfer. As such, it is important to remember that these ten key factors, though complete, are a starting point for analysis of a specific transfer; there are likely to also be other factors for consideration in every unique circumstance.

These ten factors have been specifically formulated for policy transfer relating to sustainable consumption. However, the basic principles set forth in them can also be applied to policy transfer in other fields. Generally speaking, it is difficult to make definitive recommendations for policy transfer because each situation is so unique.

This paper is an explanation and analysis of trends and commonalities noticed among general policy transfer, and applied to sustainable consumption. The ten "key factors" represent the most critical areas that are recommended to be considered when transferring sustainable consumption instruments.

The ten key factors have been divided into three different groups.

Group one: Macroeconomic circumstances

This grouping of factors addresses the potential parameters and limitations of the situation. It asks the question: which policy fits? It asks for analysis that describes criteria that one should consider when “setting the stage” for a policy transfer. It includes considerations that are preliminary to a transfer, and that primarily concern the setting of the given country. It is generally factual, and is more black-and-white than the other categories. An analysis from this category can determine whether a transfer should take place at all, and under what circumstances it should take place.

- 5.1 Problem analysis and target setting
- 5.2 Fit of interventions to a given institutional setting
- 5.3 Economic structure and market conditions
- 5.4 Levels of consumption of goods and services

Group two: Reactions to different interests.

This grouping focuses on stakeholders (consumers, government, industry, etc), and how to influence what you have to do to make a policy transfer successful. It focuses more on the dynamic between groups of people, including consumers and other stakeholders; it looks at the “reactions” of people that may be affected. It addresses issues relating to the tailoring of a policy so that it can be designed most effectively, and how different stakeholder or interest groups may affect its design and impact potential.

- 5.5 The role of distinct demographic groups
- 5.6 Political practicability and political marketing
- 5.7 Dynamics of rationalities and power among stakeholder groups

Group three: Acceptance measures

This grouping is more instrument-specific. It addresses how to flank, or sell, a policy. It asks how to ensure the policy is implemented in the most effective way possible. This group is focused on potential concerns and problems that will be faced by the policy, both by people and other interventions. It discusses the potential for conflict and “acceptance measures” that should be taken to encourage acceptance by the general public.

- 5.8 Conflict potential of interventions
- 5.9 Legitimacy of interventions
- 5.10 Mainstreaming policy innovations

4.1 Problem analysis and target setting

Problem analysis is important to avoid importing and implementing seemingly successful policies without a proper appreciation of the local problem they are to solve, without being aware of the conditions that brought the need for a policy transfer or introducing a new instrument. Usually, the reasons considered by national policymakers are that there is a newly emerging policy area. One example of a newly developing policy area is sustainable consumption in the area of food. Or, perhaps, policymakers noticed that what they had previously been doing with traditional instrument was working to solve current problems. Problem analysis and target setting often comes about when there is international or supranational pressure to solve a particular problem. This pressure leads to policymakers defining policy problems and goals, and searching for solutions to them.

From a global perspective, a rapid diffusion of market-based, voluntary or informational instruments can be observed in the field of environmental policy. Examination of a foreign system with an aim of policy transfer involves a combination of factors reflecting different needs and potential outcomes in the recipient country. Analysis of problems in the country is a necessary step preceding policy transfer. A problem area can be highlighted in multiple ways, ranging from a simplistic identification of a need area by the government, to pressure placed on a government by external forces. The experience of the European Energy Performance of Buildings Directive (EPBD) is a good example of how the international community, or the European community in this situation, can place pressure on national government to reach certain goals. In the case of the EPBD, countries reluctant to meet new standards were pressured, by an all-member state agreement on policy targets, into doing a policy transfer through target setting.

Regarding problem analysis and solutions, governmental actors are not necessarily the only figures who can bring up and initiate action in a need area. For example, the recognition by domestic figures (academics, think-tanks, professional associations and NGOs) of environmental and sustainable consumption problems may encourage national governments. In the UK, the development of climate policy was deeply embedded in domestic processes, from the initial framing through to the implementation of policy (Smith, 2004).

In order to examine the conditions for policy transfer, it is important to look at drivers for the transfer in relation to the degree of problem analysis in the country. A continuum of drivers stretches from entirely coercive mechanisms with strong conditionality aspects to purely voluntary drivers, where perceptions are dominant in the aspiration to improve an existing situation (Dolowitz, 2009). Different forms of learning may be associated with the policy transfer. Pro-active national governments engage in policy transfer to adopt “best practices” by observing foreign information, and distinguishing it from what is currently occurring in their home systems. From another perspective, domestic processes and developments may frame the search for lessons. Smith (2004) argues that any transferred policy will have to negotiate a way through domestic policy processes, and in so doing, the policy transferred may be transformed. However, the shift of domestic policy context is also viewed as a result of transfer through a process of mutual adaptation.



4.2 Fit of interventions to a given institutional setting

This key factor discusses whether a policy will fit into a new setting in the same way it fit into the institutional setting of the lending country. Obviously, every setting is different; a certain amount of tailoring will need to be done. However, jurisdictions with similar political structures and institutions will have an easier time transferring policies between them. When considering policy instruments to promote sustainable consumption, it is important to note that consumption is influenced by a variety of institutions other than administrative structures. Policies to promote sustainable consumption generally cut across policy domains, so many different kinds of institutions can be implicated. These may include areas such as established structures of public and private service provision, market institutions like particular forms of finance, ownership structures, and forms of private governance. Informal institutions are social practices based on underlying norms, and are not necessarily written down or explicitly codified (de Jong and Mamadouh 2002). Therefore, nationally developed instruments may find support or opposition in other institutions beyond administrative ones.

For example, the two policy instrument cases from Finland build on quite idiosyncratic institutional contexts. Sustainable public catering (Aalto and Heiskanen 2011) assumes a sizeable public catering sector, i.e., a share of food provision that is provided or financed by the public sector. For this policy to work in another country, that country must also have a large public catering sector; a small catering sector may not be able to accommodate such an instrument, or the effects may be very different. In the housing sector, the Energy and Environmental Expert (EEE) instrument (Heiskanen and Aalto 2011) builds on particular features of the housing stock (sizeable share of apartment buildings), and particular forms of governance of the building (residents' boards, tenants' boards). In order for this instrument to work in a new setting, there should be some sort of residents' boards or governance within apartment blocks. Otherwise, there would be no basis through which to implement the Energy and Environmental Expert concept.

In order to examine the conditions for policy transfer, it is important to understand to what extent the intervention theory is dependent on particular institutions or initial conditions. These dependencies can then indicate where successful transfer might occur. Some conditions are more essential than others. For example, in the case of public catering, the fact that the public sector finances the food provision might not be a necessary condition for transfer. Sustainability criteria have been introduced into situations where public catering is not financed by the state, for example in Italy, where parents pay for school meals (Alcantud et al. 2010). However, in these cases, the venues in which the meals are provided (schools) are governed by certain governmental provisions, and the activities occurring there are supposed to conform to certain norms, similar to the public catering sector in Finland. This is perhaps why the difference in funding source does not necessarily exclude a public catering transfer between Finland and Italy. However, if there are no or few school meals provided in a country (e.g. schoolchildren eat at home or at a fast food outlet), then it is not likely that this instrument can gain a significant foothold in such a country.

In the same vein, one might argue that public acceptance of carbon savings obligations for energy utilities (see Leung 2011) will depend on the ownership structure of energy utilities. In countries and regions where energy utilities are owned by municipalities (e.g. Germany), the interest of such 'public utilities' in saving energy might be perceived as being more genuine than where utilities are publicly listed or owned by for-

eign energy providers. One reason is that consumers may be able to see that the municipality is trying to save money and be “green,” and this may benefit the individual consumer in the long-run. However, if the energy provider is a large company, or is seen as a distant entity, consumers may be more sceptical of its efforts to be “green.”

In the EEE case described above, one major requirement, on which the intervention logic hinges, is the existence of energy efficiency potential that can be captured through resident action such as monitoring and control, changes in user behaviour, low-cost improvements or investments that the residents decide on. Such potential exists in every European country. However, the existence of this factor does not necessarily mean that a transfer can be done to any European country. There are other factors to consider, such as the ‘semi-official’ status of the EEE. In Finland, this person is nominated by the residents’ board or the tenants’ board. Even though institutional structures of building governance vary from one country to another, there is usually some form of co-operation and some bodies with power to make common decisions in apartment houses. However, as noted in the EEE case (Heiskanen and Aalto 2011), the instrument is more effective in owner-occupied housing where residents have the power to make financial decisions, such as decisions on renovations. This suggests that the most promising transfer recipients are countries with a large share of owner-occupied apartment buildings, such as the Nordic countries, Southern Europe and New Member States. These institutional settings make a transfer easier and more straightforward.

Special attention has been directed towards administrative traditions, regulative structures and policy styles. The emphasis on “administrative fit” or the “logic appropriateness” (March and Olsen 1989) is based on the general assumption that “institutionally grown structures and routines prevent easy adaptation to exogenous pressure” (Knill and Lenschow 1998:2). National capacities, therefore, function as filters to the adoption of innovative measures (Kem, Jörgens and Jänicke 2001:8, from Tews et al 2001). Since each country is different, this cannot and will not preclude the adoption of foreign policies; however, it will affect the likelihood that a policy is adopted.

4.3 Economic structure and market conditions

This key factor is distinct from “levels of consumption of goods and services” (Key factor 4) because it addresses the general structure, system, and conditions of a country. “Levels of consumption of goods and services” covers the issue of individual household consumption, while this section focuses on the economic system of the country, such as taxes, structure, and market conditions of the state. Clearly, these two factors are related, but they have been separated in this work task so the essential characteristics of each factor can be individually addressed.

An example of different economic norms and structures that would lead to potential incompatibility or challenges is in the need area of housing and energy renovations. Ownership structures may differ greatly between countries. For example, in countries such as Germany, the housing stock is largely state-owned, where as in Latvia, apartments are more likely to be privately owned. This means that a housing policy transferred between two such countries would have to be greatly altered to take into consideration the differences in ownership structure.



Several Impact Assessments developed within EUPOPP highlighted the importance of taking into account the role of different types of consumers. This is especially relevant in the case of energy retrofitting of buildings. This case shows that there are important factors to note regarding disparate groups. Whereas, for example, in Germany, over 50% of the buildings are not self-owned (Destatis 2008¹⁰: 216), the proportion of self-owned buildings e.g. in Latvia is much higher. This leads to essential differences in policy design, as it is especially difficult to encourage building owners to renovate buildings if they do not live in them. Additionally, the difference in policy design should not be, or has not been, found in the core instrument (e.g. minimum energy performance standards for buildings), but in the supporting policy instruments. Indeed, as core instruments are often laws or directives, they have to be somewhat general (except the focus on building owners) to be constitutional and practicable. In contrast to the core instrument, supporting instruments can be very specific regarding different types of consumers. In the above-mentioned example, this would lead to different additional instruments in Germany than in Latvia, as consumer are composed differently, as described in the preceding paragraph. Since there are many more self-owned buildings in Latvia than in Germany, rented buildings may be neglected in the first run in Latvia. This is especially important when transferring instruments from country level to e.g. EU level; in many cases, it might be practicable to design a common core policy that takes into account national differences at the stage of additional supporting policies.

Access to loans and financing (financial structures) are also very relevant to a country's overall economic structure. Consider, for example, a comparison of mandatory housing energy standards. In Germany, people over 65 cannot get a reverse mortgage, so they effectively have no more access to financing; they do not have a way to finance energy renovations. This leads to a lack of incentive to remodel and increase the value of their homes, and in the process, make their homes more energy efficient.. In Finland, by contrast, over 65's do have access to reverse mortgages and other financing options. In fact, most people actually do energy renovations after they turn 65 because they have more time, and have an interest in increasing value of home.

As opposed to the housing examples, we have not found this kind of structural differences on the consumption side of the food sector; however, we have found them on the production side.

Much of the character of a country is determined by its level of development and the amount of globalisation it has undergone. Though this is not, by any means, a defining characteristic, it is relevant for the adoption of policies from other countries. Jurisdictions with similar levels of economic development tend to have some of the same concerns and issues to be addressed. The system of economic organisation is also rele-

¹⁰ Destatis (Statistisches Bundesamt) / Gesellschaft Sozialwissenschaftlicher Infrastruktureinrichtungen / Wissenschaftszentrum Berlin für Sozialforschung (Hrsg.) (2008). *Datenreport 2008. Ein Sozialbericht für die Bundesrepublik Deutschland*. Wiesbaden.

vant to the politics and potential adoption strategies of a country.¹¹ In addition, many potential transfer policies are economy-based, so transferring to a country that has a similar structure to the lending country will greatly streamline and simplify a transfer. It will also increase the likelihood that a policy is politically practicable and implementable pursuant to the other factors for adoption identified in previous sections.

Current and past economic situations also affect the way society functions and thinks about resources.¹² This is because a country's past economy can have long-lasting effects on its current model, and may influence the way its government sees new policies. A newly developed country, for example, would have different concerns, problems, and market conditions than a country that has been prosperous for centuries. Conversely, countries wishing to increase their economic development may actually be more willing to adopt policies from more developed countries to raise their own standards. In this situation, having different economic situations may be a driver in the adoption of a new policy by a rapidly developing country wishing to learn from the experiences of others.

4.4 Levels of Consumption of Goods and Services

Levels of consumption of goods and services addresses the general amount of consumption households in a given country may have. Clearly, there is great discrepancy in each country, and there will be rich households and poor households in every area. However, there can often be trends associated with a country, and the average consumer in one country may have very different access to goods than the average consumer in another country. This key factor is particularly salient if there is a big difference between the level of consumption of the average household between a lending and adopting country.

Across the EU, there is a strong link between household income and expenditure. A household's economic well-being can be expressed in terms of its access to goods and services. The relationship between the level of welfare (as measured by GDP) and the potential for consumption should be examined, and the relative volumes of consumption per capita can be compared (based on Eurostat data from 2008 and 2010). The term "actual individual consumption" (AIC) includes all goods and services actually consumed by households, and this is usually highly correlated with GDP per capita¹³.

Levels of consumption of resources, such as energy and water, are closely related to the attitudes of citizens, their readiness to take action, and also on the types of sys-

¹¹ Stone, Diane (2004) Transfer Agents and Global Networks in the 'Transnationalisation' of Policy. *Journal of European Public Policy* 11.3(2004): 545-566.

¹² Adams, Neil (2008) Convergence and Policy Transfer: An Examination of the Extent to which Approaches to Spatial Planning have Converged within the Context of an Enlarged EU. *International Planning Studies* Vol. 13, No. 1, 31-49.

¹³ Actual individual consumption per capita is usually more homogeneous across countries than GDP per capita.



tems available to them. Some indication of these factors can be obtained from survey results.¹⁴ For example, final energy consumption per person for space and water heating, cooking, and electricity in households across Europe range from less than 10MJ/person in Malta to around 60 MJ/person in Luxembourg. The EU27 average is 25 MJ/person.¹⁵ Different consumption patterns, climate, energy efficiency of buildings, type of heating systems, and energy prices are among the factors influencing such differences. It is important to include all these factors when analysing levels of consumption in a particular country.

The relationship between levels of consumption and household appliances may be largely influenced by purchasing decisions that are based on factors such as prices to consumers, environmental considerations and labels, culture and social status. Results from surveys may provide better country-specific insight. Aside from economic influences on consumption, differences in behaviour of households with similar incomes within a single community or country will result in different levels of consumption of goods and services. Studies of such households reveal huge differences in energy use and GHG emissions.¹⁶

At the national level, individual levels of consumption cannot be fully separated from levels of economic development. For example, in the years preceding the recent economic crisis, some new Member States were developing rapidly, and consumption was increasing quickly, even though GDP per capita remained low compared to the rest of Europe. However, from 2007-2009, there was a very substantial decline in actual individual consumption due to the economic crisis in these countries. This leads us to the next key factor, which is related to, but distinct from, individual levels of consumption of goods and services.

4.5 The role of distinct demographic groups

This factor focuses on different consumer needs based on demographic information. “Consumption practices [...] are social rather than individual processes, and [they] are embedded in a social context such as household, family and community life” (Schultz / Stieß 2009¹⁷: 60). As there are different types of social contexts, this means that there are also different types of consumers, and any policy transfer should include an analysis of how to include and target different types of consumers. This covers needs and

¹⁴ For example, 17-19% of citizens in France, Spain and Portugal have indicated of making efforts to use less water as an action with the greatest impact on solving environmental problems, while 9-10% responded in Cyprus and Malta where water scarcity is emerging, but very small or almost none responded in countries like Lithuania, Latvia and Sweden where water resources are not short (Flash EB256, 2009: 9). Such indications may be used for considering the water saving campaign.

¹⁵ (data source: EEA, 2010:30)

¹⁶ (EEA, 2010:17).

¹⁷ Internal EUPOPP Document: Schultz, Irmgard / Stieß, Immanuel (2009). WP 1: *Gender aspects of sustainable consumption strategies and instruments*. Institute for Social-Ecological Research (ISOE), Frankfurt/Main.

practices of individuals, with a focus on tailoring policies to specific factors. It is necessary to know which groups will be affected by the instrument transferred and what are the commonalities and differences between those groups. According to Gilg et al. (2005¹⁸: 282-284), differences between groups of consumers can appear within the underlying values and concerns, socio-demographic factors and also psychological factors.

Differences between types of consumers, and the wide demographic range between countries, are particularly important in the realm of sustainable consumption; the consumption process itself is heavily influenced by different groups and those groups are again different when speaking about different areas of consumption, e.g. housing and food. Within the target area of food it is important to find out if there are differences with regard to dietary habits.

For housing, there are other factors to be identified. On one hand, it is also about habits (e.g. people are used to live at a certain temperature inside their homes which is hard to change), but even more important are questions of (traditional) living conditions.

EUPOPP has specifically focused on the gender aspect, which is especially important for sustainable consumption in the areas of food and housing. As Schultz / Stieß emphasize, decisions on diet, clothing and household articles are dominated by women, while decisions relating to technical aspects and energy consumption are dominated by men (2009: 60). Therefore, within the target area of housing, it might be possible to highlight the positive sustainable effect within the household that men could play with conducting renovations, while within the realm of food, women could be the main addressees. This is not to stereotype or limit the demographic group addressed for food or housing; men may be targeted for food choices, and women for housing issues. This is merely an example of how demographic studies, showing what groups of people are more likely to make a household decision for a particular area, can be used when addressing consumers in a specific need area.

Finally, the role of different demographics in the consumption process also means that policies should not work with general recommendations (e.g. “Your health will benefit from reducing meat consumption”). It would be better to formulate plans based on gender and, because there are great differences within gender groups, the plan should provide group-specific recommendations (e.g. speaking to men of a certain age, or in their role as fathers) (Schultz / Stieß 2009: 63).

Such differences should not only be taken into account in cross-country comparisons, but also with regard to the national situation. As mentioned above, the national situation (demographic composition and differences in habits, needs and practices) has to be analysed, and policies must be designed to fit relevant groups. In cases like Latvia, it might be sufficient to start with addressing self-owned buildings only; in Germany, this would (and has) led to worse results. Finally, even if there would only be one group of consumers, the policy has to fit their everyday needs and practices.

¹⁸ Gilg, Andrew / Barr, Stewart / Ford, Nicholas (2005). „Green consumption or sustainable lifestyles? Identifying the sustainable consumer”. In: *Futures* 37 (2005) 481–504.



4.6 Political practicability and political marketing

Marketing of a policy to both policy makers and the public is an essential phase for implementation and adoption. A policy that is marketed as straight-forward and beneficial to the community will face the least obstacles. However, each context is different, and must be interpreted for each policy to be implemented. Close attention should be paid to the political atmosphere relating to a specific topic in a given country. There are several layers and contexts to be examined. First of all, it should be recognised that social learning and sociology, are often as, if not more, important to a policy transfer as the scientific aspects of the transfer. Social learning involves the process in which a policy goes through when it is adopted or created. The people who affect the policy, controlling its success or failure, range from high-ranking senior civil servants to local governments that must plan how to implement the policy. Once a policy has passed through these levels, a “paradigm shift” occurs where a new policy is experimented with, and successes and failures can be examined.¹⁹

This process is very delicate, and may result in a potentially successful policy being rejected. Timing is also very important. A policy is seen as much more practical, and therefore more easily marketable, if a country is looking for a solution to a specific problem. A poorly timed policy transfer, will face many challenges from a policy community that is not interested in advice regarding a topic. For example, one study found that advice from the OECD, over 25 years to 16 countries, was rejected by nearly all the countries unless they were already seeking help to solve a specific problem.²⁰ The same article concludes that policies will generally only fit if places strategically in a policy sequence. The effect of a policy, and the ensuing consequences, are largely determined by timing and careful placement among other related policies. The context of a policy is crucial in its practicability and marketing.

Timing is not the only important factor. The way an instrument is presented, and the way it is received, depends largely on the way it is marketed. Knowledge transmission and communication is vital here. The “triangle of change,” discussed above, is relevant to this discussion. When presenting an instrument, policymakers should present a balanced view of the three actor groups, and how they should be addressed in communication and marketing. Creative techniques can be used here, such as piloting of a new instrument through demonstration sites. For example, a local government could demonstrate that veggie days are okay, and kids are not malnourished. Another example, of marketing would be to hand out new light bulbs to show that CFL’s are okay, and can light your house. Some types of communication can be negative, and should be avoided. The EPBD is an example of bad communication, where people were not given adequate information about how or why to refurbish their houses.

¹⁹ Dwyer, Peter and Nick Ellison, “‘We Nicked Stuff from All Over the Place’: Policy Transfer or Muddling Through?’ *Policy & Politics* Vol 37, No 3, July 2009: 380-407.

Hall, Peter “Policy Paradigms, Social Learning and the State: The Case of Economic Policymaking in Britain.’ *Comparative Politics*, vol 25, no 3 (1993): 275-97.

²⁰ Manning, Nick ‘The Origins and Essence of US Social Policy’ *Global Social Policy*, vol 6, no 2 (2006): 155-72, 164-65.

4.7 Dynamics of rationalities and power among stakeholder groups

This key factor addresses the effect that the power and influence of certain interest groups can have during a policy transfer. It focuses on their role in the development, or hindrance, of a transfer. It discusses the relative power of different groups in society, regardless of where that power comes from. This means that both government and non-governmental organizations may have power. This can include industry groups and government agencies that are implementing a new policy. Both are powerful, especially relating to the implementation of a policy, but their power comes from different sources. Generally speaking, instruments are created at the national level, but implemented at a lower level. The level of government implementing the policy differs, but is usually not the state government. Thus, the level of government executing the policy is often a local level, but may also be a regional government. Thus, the level of government effecting the change is referred to here as the “implementing authority.”

Lobbies and local industries are likely to be a focal point when dealing with the transfer of policy instruments concerning food. Policies that are likely to reduce the consumption of meat or that aim to shift production modes toward organic production have an impact on certain lines of agricultural production. Industry associations tend to take conservative “lowest common denominator” positions on public policy issues, though these positions might not be consistent with the interests of the best-positioned companies (Repetto 2006).

An example of how differing stakeholder perceptions (rationalities) of the implications of an instrument can emerge as a major barrier, is the case of the German one way beverage packaging deposit. The introduction of the instrument, while negotiated in advance, among others, with major industry stakeholders, was avidly opposed and legally challenged by these when the bill introducing the deposit came into force in 2003. This was due to related obligations to build and bear the cost of an adequate collection and clearing infrastructure. Being backed by a number of powerful industry associations, the opponents of the deposit scheme managed to obstruct its full implementation for several years. It took until 2006 for industry to comply with its obligations under the packaging ordinance. Since then, the advantages of the system to both consumers (easy return system) and retailers/producers (standardised handling facilities and easy recovery of valuable secondary resources) have led to universal acceptance of the deposit scheme (Schönherr 2010).

Apart from pressure groups, the role of local authorities is very important. There is great disparity in fiscal power, i.e., the extent to which the finances of the level of government are dependent on transfers from the state. The resources available to implementing authorities can influence, for example, possibilities to enforce energy performance standards on existing buildings (Brunn 2011). Where energy renovations are required for buildings undergoing major renovations (i.e, renovations requiring a building permit), this implies an additional administrative burden on building inspectors, who are (or are contracted by) municipal or regional authorities in all European countries (Visscher and Meijer 2005). However, here, at least, there is a possibility to cover some of the costs with a fee for the permit. If such requirements are extended to all buildings, the power and resources of building inspectors need to be considerably



greater. Moreover, the regulation and oversight of buildings needs to be impeccable; corruption or possibilities to circumvent regulations can reduce both the legitimacy and the effectiveness of building regulations.

4.8 Conflict potential of interventions

A further important consideration in policy transfer concerns the compatibility or conflict potential inherent to a specific policy innovation. This factor is not only relevant for the political practicability of a transfer but also influences the policy design of the adopted instrument. Does the transferred policy conflict with pre-existing constitutions, laws, or concrete existing policies? Is there competition within the EU on this topic? There may be structure conflict potential, or conflict inherent to a specific policy innovation.

A good example on this topic is Green Public Procurement, which promotes the purchase of sustainable products, such as food, instead of the Promotion of Local Products. Green Public Procurement states that local products cannot be requested as such (although it would be the option with lower GHG emissions) because it would contradict the principle of “no discrimination” and undermines free movement in the EU market. On the other hand, local administrations try to promote local products to advance the economy of the community by means of purchasing their own products. The end result depends on the specific context, and the prioritisation that a given jurisdiction will give to each policy. In the case of school canteens in Italy (an example that has been repeated in some other countries), the school canteen system’s public procurement requests fresh and seasonal food products, which indirectly causes the prioritization of local food products.

The compatibility of the policy innovation with existing programs and measures must also be examined. Compatibility often depends on the specific policy to be transferred, as well as on the existing programs and measures in the adopting country. Each case must be examined individually. Furthermore, policies should be viewed as flexible when analysed for transfer so the policy maker can adapt it to meet the needs of the adopting country.

An example here is with the German beverage deposit. There was initially conflict between national law and European law that needed to be resolved. There were concerns about the law establishing the deposit scheme conflicting with basic principles of the *aquis communautaire*, particularly with regard to competition in the EU market. The bill was consequently legally challenged (in 2001 and 2004) for effectively barring producers from abroad to enter the German market. These concerns were laid to rest through a review of the packaging ordinance in 2004. The legal challenge points to the innovativeness of such a strict deposit system as an instrument in Europe rather than a conflict in principle with EU instruments. The point illustrated by this example is that (comparably) innovative instruments can be successful if adaptable and well-designed even though they are more likely to be challenged on grounds of compatibility.

4.9 Legitimacy of interventions

Legitimacy of interventions refers to general public acceptance of a regulation as an authority, and an instrument’s ability to influence people’s behavior. This section dis-

cusses the legitimacy of policies. According to Monedero (2009)²¹, an analysis of legitimacy must include a discussion of the reasons that citizens have to obey institutions that hold power. The legitimacy is also linked to a specific space and time, and usually involves community life and welfare. The question of who is legitimately allowed to implement certain policies will depend on the policy, as well as on the location and time. For example, during the Catalanian water drought, the ensuing Decree of Drought regulated public competencies, and public bodies were “legally-legitimated” to establish a command-and-control system to manage bans and sanctions that restricted non-basic uses of water. However, the bans and sanctions would be out of place in a non-crisis context, such as bans on watering courtyards, filling pools, or washing vehicles with hoses; these restrictions would not be as effective and would be difficult to legitimate.

The most suitable actors to promote sustainable consumption policy may be consumer associations and other civil society organizations due to the fact that citizens perceive them as equals. This lowers the risk of people perceiving the SC policy as an imposition by public institutions on private households and private living standards.

Generally, legitimization of policies involving citizens’ basic needs, which are perceived as private information, is not an easy task. This applies to the example of food. Citizens can perceive these policies as interferences in their privacy. Therefore, in these cases, there must be convincing reasons to justify this interference in private life; citizens need to view them as beneficial for themselves and the community. For example, during the drought in Catalonia, citizens were extremely vulnerable due to the crisis. However, the transparent way in which the public bodies acted made citizens feel like they were part of the solution, thus legitimizing the policies used in the situation.

In the need area of housing, most EU policies are “command and control” programs and measures. Regulation of appliances and buildings are seen as legitimate because public institutions must regulate aspects such as the safety and quality of buildings and appliances. Currently, sustainable consumption policies in the area of housing are legitimate because people are accused to public bodies regulating the area, and this is actually happening in sustainable consumption policies in housing.

In the need area of food, the situation is less straightforward. People view food behaviour and habits as very personal, and it is considered part of private life. It is therefore more difficult to legitimize policy instruments in this field. Generally speaking, recognizing the legitimacy of public institutions to regulate food safety is the duty of public bodies, and public institutions use “command and control” instruments. However, in relation to sustainable consumption in the realm of food, public bodies can only suggest what kind of food to eat and how to cook it by using health or cultural reasons.

In another example, public bodies may promote organic waste separation in households through transparency and properly informing citizens. Actions taken by public bodies are often seen as an intrusion in private life, and therefore require a concerted effort to achieve legitimacy. Legitimacy can be obtained through transparency and by conveying the necessity of the policy. The public body must communicate why certain

²¹ Román Reyes (Dir): Diccionario Crítico de Ciencias Sociales. Terminología Científico-Social, Tomo 1/2/3/4, Ed. Plaza y Valdés, Madrid-México 2009

actions have been taken, and must demonstrate the collective benefit provided. In addition, the effort required by citizens must be explained. In the case of organic waste, for example, the government must explain to citizens why they are collecting organic waste and what they hope to achieve with this change in behavior patterns.

Initiatives originating from the EU may be considered sufficient to justify national, regional or local policies. Citizens may be more likely to understand that their country must adopt EU-mandated policies. However, this does not necessarily mean that EU institutions are useful in legitimizing local, regional or national actions. In other words, it does not necessarily mean that citizens recognize that EU institutions have the power to promote sustainable consumption policies that will be transferred and applied at the national, regional or local level. It may, however, help the legitimization process in the Member State.

Furthermore, sustainable consumption policy-making touches upon very socially and politically sensitive issues, particularly when sustainable consumption requires redistributive policies or when public authorities start intervening in areas that were previously considered “private”²². It may take years or decades for the general population to become accustomed to the idea that the government can mandate what they eat or how they eat it.

4.10 Mainstreaming policy innovations

Transferring institutions and actors need to manage the mainstreaming process across their networks during and after the adaptation process. This means activating and mobilising relevant actors for the purpose of channelling the implementation and reactions to it. Once a policy is adopted, are there certain key actors that are responsible for either pushing the policy through, or for pushing it to the side? How powerful are lobbyists, NGOs, consumer groups, etc, in making it successful? The media can also play a powerful role in the adoption and ultimate success of a new instrument.

The implementation of policies will never be a fast-selling item. One major issue is the involvement of relevant stakeholders, not only during the policy design and creation process, which can be triggered by interest groups (Tews 2001²³: 8), but also within the implementation process. Stakeholders are often powerful actors which are able to influence policy design and implementation, and who can therefore contribute to the

²² In private issues, such as food consumption, how do people view the government’s legitimate role? All societies have food consumption issues, but each culture handles it differently. For example, people in the UK are suspicious of the government telling them how to eat, whereas people in Finland or Germany are much more willing to listen. Another example involves the Energy Expert instrument- interaction between neighbors seems to be crucial.

²³ Tews, Kerstin / Busch, Peter-Olof / Jörgens, Helge (2001). *The Diffusion of New Environmental Policy Instruments*. Environmental Policy Research Unit, Free University of Berlin.

success or failure of a policy (Dwyer 2009²⁴: 389-394). In the housing area, for example, energy renovations are generally not conducted by building owners, but by small and medium sized external companies. Therefore, apart from the decision to renovate itself, it is especially important that those companies understand and support the instrument as they have direct contact with decision makers, and have the potential to convince them. Stakeholders are especially important because they influence perception (Tews 2001: 10). Transferring institutions and actors need to manage the mainstreaming process across their networks during and after the adaptation process. This means activating and mobilising relevant actors for the purpose of channelling the implementation of the policy, and handling reactions to it.

The media can also play a powerful role. Policymakers should determine how to make sure people react to an instrument. For the example of beverage bottle deposit, how do you get people to return bottles? How do you get industry to comply? One way to help mainstream a policy with individual households is to have local celebrities support the idea.

In the need area of food, key actors may be parents or teachers. In housing, key actors may be housing associations, residential groups, schools, etc. These people are “multipliers” because their role is not about their ability to influence policy. Their role is to spread a policy innovation into society, and increase its acceptance; this is accomplished not through official channels, but through grassroots and community interaction.

Additionally, some new policies require cooperation between different intermediaries. For example, the beverage deposit system in Germany required industry to set up machines, and to provide information campaigns and mechanisms. This may also require consultation with or active participation of potential intermediaries/key actors in earlier steps of the transfer process. The earlier stakeholders get involved in the process, the easier it is to prevent misunderstandings and problems in implementation. In the example of CERT in the UK, industry stakeholders were involved in the creation of the CERT requirement from the very beginning of the process. CERT required energy companies to reduce their customers’ energy usage by a certain amount by the end of three years. Industry was involved in pushing and implementing the policy, and their viewpoints and attitudes were incorporated into the policy. This working relationship between policymakers and industry, especially where industry was an essential part of the energy reduction, was vital to the cooperation of industry. This is because instead of seeing CERT as a regulation forced upon them, they saw it as something they were a part of.

5 Application of key factors

This section focuses on the application of key factors, given that policy transfer in the EUPOPP context are occurring within the EU, based on a directive or treaty. Most policy transfer happens here because policymakers feel they need to address a directive

²⁴ Dwyer, Peter / Ellison, Nick (2009). “‘We nicked stuff from all over the place’: policy transfer or muddling through?” In: *Policy & Politics* 37 (3).



or a treaty, and then they decide, for their country, how to proceed. One way to determine a policy path is to look at examples of policy from other jurisdictions, and transfer parts that they think would work in their own country. In this sense, they are given lots of maneuvering room within the basic framework of the guideline or idea. This, then, links to the key factors described above. In the given context of a policy transfer, policymakers should then determine which of the key factors inhibit policy transfer, and which help the process? Based on these factors, policymakers can decide whether a policy transfer should occur at all, or under what conditions it should occur.

The key factors offer insight into how the generic criteria can be applied to successful sustainable consumption policy transfer. Sustainable consumption instruments, in specific, are largely dependent on cultural factors, and on interlinkages between consumption and consumption and production, distribution, and retailing conditions (systems of provision). It is a somewhat delicate topic, especially in the need areas of housing and food, because it affects individual lifestyle choices that people tend to see as personal and private. Thus, when considering transferring policy in this realm, these complex interlinkages must be taken into consideration.

There are multiple ways in which policy transfer can occur, particularly in an EU setting. Generally, policymakers cannot immediately influence certain context factors, such as economic norms, but can shape a policy to fit the context. This room for maneuver is based on the concept of making the best choices, given the context. Applying these key factors implicates a decision, not of which factor to use, but of how to use them. A policy transfer can be vertical or horizontal. This determines the margin of appreciation, and the room for maneuver, that the policy maker has for the transfer, and influencing what happens. Vertical transfer refers to a situation where the EU adopts a policy from one of the member states, and then requires its implementation for all member states. Horizontal transfer occurs when one member state adopts the policy of another member state. The criteria and situations discussed in the hypotheses above can apply to both horizontal and vertical transfer, both of which should be considered for policy transfer.

These key factors will help with the procedure of a policy transfer. As a starting point to determine whether a particular factor will hinder or help, policymakers should look at whether they are dealing with a coercive or voluntary policy transfer, or somewhere in between. Voluntary transfers, where policymakers see a need area and decide to improve it, are really rare. Usually, policy transfers are precipitated due to some amount of peer pressure, such as the EU requiring member states to do something. International conventions or frameworks may also have the same effect on a country's policymakers. These frameworks will often target a policy problem, and then individual countries are required to adopt implement new policy. They are not forced to do something specific, but have pressure to do something new about the topic in their country. At this point, they will look around for ideas, which leads to policy transfer. Nowadays, the biggest policy transfers occur because nations are acting on a global scale, and in regional frameworks. There are overarching, international settings where they are developing joint policies. When policymakers look for examples, they can examine a case where a country has struggled with a policy, and a case where a country has been successful. Learning can occur from both scenarios.

Policymakers should first look at the different groupings of key factors, and then decide what way to use them. Specifically, they should determine which of the factors will

help the policy transfer, and which will inhibit transfer. The helping and inhibiting factors will change depending on the policy transfer scenario,²⁵

In the need area of food, an example can be made of the beverage deposit, cash refund system in both Germany and Finland. Why did the Finnish beverage deposit system get adopted so easily, whereas in Germany, it was initially rejected? Was it macro issues? Stakeholders? Implementation? By looking at this example, we are illustrating that in one country, any number of key factors played a role in either inhibiting or helping the policy. Did the policy fail because the helping factors were not addressed properly? In some scenarios, policies will be transferred very easily because the factors addressed fit perfectly with the society.

In the need area of housing, one could examine the different structures of home ownership in Europe. Is the nation's housing stock mainly publicly or privately owned? For example, in Germany, most of the housing stock is state-owned, and in one apartment block, there may be a mix of private and publically owned flats. In Latvia, flats are largely privately owned. This is due to the fact that in the 1990's, citizens were offered, as a compensation measure for enduring a socialist state, the option to privatize the homes they were currently living in. They were given the option to sell their homes or to privatize them, and many chose to privatize their flats. If a policy was to be transferred between these to nations, policymakers would need to identify which key factors help, and which hinder. And, in the case of both food and housing need areas, the short, medium, and long-term goals should be determined.

5.1 Emphasis on long-term goals

A successful policy transfer is not a quick fix with quick results and no resistance from stakeholders. It means looking at the whole picture and being creative/enough to think in the medium and long term. It means not excluding potential beneficial policy options simply based on the fact that short-term resistance may be a barrier. In terms of policy learning, the short, medium, and long-term goals of policymakers are relevant to determining which key factors help or hinder. They need to differentiate between the short, medium, and long-term because this determines what a policymaker can do, or how big of a difference a policy can make over a certain period. Even short-term policies have a time lag.

For policymakers, the quickest or easiest policy solution to be implemented may be the fastest-acting one with the most immediate results. This is often not the most preferable or beneficial one, from the perspective of long-term sustainability. It may be ulti-

²⁵ One consideration, in relation to new member states in Central and Eastern Europe, is: What are the different preconditions for the application of these key factors to CEE? For example, inhibiting factors in CEE may be current "levels of consumption of goods." Helping factors can be "institutional setting," which can be adopted by the CEE, and which, for the past few decades, is already in the process of being adopted. For more information on this, see the attached paper by Heidrun Fammler.

mately beneficial if one takes a long-term view instead of a short-term view. Policymakers often have a 4-5 year horizon, which is a short-medium term target setting for policies because they are bound by political factors such as re-elections, public opinion, and ratings. They may prefer short-term goal setting and marketing, or the quick fix, ad-hoc acceptance of different lobby groups. However, the most important factor in policy development is the long-term. Policymakers should think about impacting the structure of the need area, or the macro and systemic level. For example, changing economic norms/ and institutional settings takes a lot of time. Even convincing a target group or stakeholder group of the merits of a policy takes a long time, and often goes beyond a legislative term.

Long-term policy goals, from the first group of key factors, affect macroeconomic circumstances and would substantially contribute to sustainable consumption goals. However, they are less often chosen than factors from the second or third groupings. This third group is more likely to be preferred by policymakers because they are instrument-specific, and short-term. Factors from the second group are more medium term, and can be worked with to achieve long-term change, if coupled with long-term policy goals. Policymakers should be encouraged to not just react to key factors in the third group; they should make existing structures work for them, and take a medium to long term perspective. They should take a slow, yet effective path, taking up stakeholder communications to increase stakeholders' ability to take a medium to long term view, as well. Policymakers could also initiate pilot programs and other ways to get citizens on their side when doing a policy transfer. Success should not be measured by quick acceptance and quick results from the third group. Instead, they should take the time to appreciate the benefits of transferring policy with medium and long term goals.

5.2 Advice for policy makers

As described in the previous section, there are a number of factors that must be considered before, during, and after a policy transfer. These factors vary greatly depending on the transfer, and whether the transfer is from the national to EU level, national to national level, or EU to member state level. Policymakers should examine the 10 key factors according to category, depending on what stage in the process they are.

For example, a policymaker considering a policy transfer, but who has not yet started, should look at the first category (macroeconomic circumstances). She should ask herself specifically what type of policy is appropriate for the circumstances she is looking to introduce the policy into. This may determine whether a transfer happens at all. Cultural factors are obviously a major influence in policy transfer, and in the general characteristics of any jurisdiction. "Culture" in this setting refers to home life, political life, history, and any aspect that is particular to a country or region. The four key factors listed in this first category attempt to encompass these different aspects so that policymakers can assess the setting of a potential policy transfer.

Once a policymaker is already in the situation of starting a policy transfer, she should anticipate what needs to be done in order for it to be successful. This is where the second category of key factors (reactions to different interests) comes in. These factors should be examined by a policymaker in terms of what types of analyses she needs to do of the current situation in the jurisdiction, in order to tailor the policy to fit. This means taking stock, or account, of how demographic groups, stakeholders, and other

groups interact in society. The most important point for a policymaker to remember at this stage is that a policy, especially one that is innovative and based on a new concept, should try to adapt itself to fit with public attitudes and perceptions. Even if, in the long run, the policymaker hopes to change general attitudes, each policy needs to fit into society at a certain level and take into account the potential reactions in society of these stakeholder groups. They may have a significant impact on whether a policy is implemented.

Once a policy has been created, a policymaker's next biggest concern is whether it is "sold" well into society. This includes acceptance by individual consumers and local and national governments. A policymaker should examine the potential for conflict between this new policy and pre-existing policies, as well as the way consumers will view the policy. They should also look at the culture of mainstreaming new policies, and try to put their new policy on the same path as other successful ones.

Policymakers, when faced with an area that needs help, or needs a new policy strategy, may question whether to make a new policy on an EU or national level. There are pros and cons to both sides. For example, implementing a new policy at a national level means that each member state can tailor the policy to their specific needs, or culture. However, this may also create a large amount of variation between the member states, which a policymaker may not find favorable to the policy concept. Based on our findings, we recommend that policymakers focus on category one (macroeconomic circumstances), which form the basis of whether a policy transfer should occur. This is relevant to whether a policy transfer should occur at a certain level, such as national or local. For example, if there is a policy that is currently at a national level, and the policymaker wishes to transfer it to the EU level, then she should examine how the specific macroeconomic circumstances of the EU fit with the macroeconomic circumstances of that country on that topic. Obviously, there is going to be great disparity, and this is a very broad statement. However, it is a starting point at which to then delve deeper into the cultural contexts described above.

Based on our research and our policy transfer findings, it is recommended that policymakers seriously consider policy transfer as a way to develop new policies. Other work packages in EUPOPP⁷ have demonstrated that there are numerous successful, innovative policies in the field of sustainable consumption already in existence in different member states. Some of these policies should be transferred to other member states, or perhaps to the EU level. To determine which policies are likely to be transferred, policymakers should first look at the cultural factors described in category one. This is the category that should be focused on when determining whether to do a policy transfer, and at what level.

Clearly, each policy transfer is different. Literature reviews and our findings all point to the fact that there is no general, over-arching rule to policy transfer. Rather, it is a delicate process that requires in-depth analysis for each potential transfer. In addition, the factors leading up to a policymaker's decision to do a transfer is also relevant. For example, a policymaker who feels pressure to create a new policy due to a new international treaty is in a different situation than a policymaker who sees a successful policy in a specific country and theorizes that it would be a good candidate for transfer.



6 Conclusion

Policy transfer is a delicate and sensitive endeavor. It relies on a number of factors, many of which cannot be predicted until the time and place of transfer have been determined. A general spreadsheet or flowchart cannot be developed showing detailed steps for a transfer because each one is unique, and depends largely on the individual characteristics of the lending and adopting jurisdictions. However, there are certain trends and issues that are consistently brought up in literature and experiences with policy transfer than have been discussed in this paper. These criteria are the most fundamental and important for a policy transfer, so were listed as key factors. This paper has highlighted the fact that transfer does not involve just one group, or one government, making a unilateral decision to adopt a new policy. Rather, it involves society as a whole, such as consumers, businesses, government – especially the implementing authority- consumer groups, and stakeholders.

Policy transfer is an important component of policy building, especially in new areas such as sustainable consumption. The fact that this is a relatively new field presents its own challenges, such as finding examples that are mature or complete enough for transfer. However, it also brings advantages because it is a ripening area that can still be developed and heavily influenced by current actors. Transfers can greatly benefit sustainable consumption policy by teaching both the adopting and lending country a lot about the policy. Making new policies is a challenge, but by examining the experiences of others, the process can be very effective at changing a specific need area. It is especially important for new policy areas. For example, sustainable consumption policy is new in the EU and EUPOPP partner countries. There are not many examples for transfer, especially in the food area, because it is so new. Taking examples from other areas is important, but in the food area, there were very limited examples. In the housing area, however, there are decades of experience regarding sustainable consumption, such as in windows, insulation, etc.

Policy transfer usually comes about from treaties, directives, or conventions. They are rarely initiated by government ministers looking to improve a need area that has not been recently addressed in one of these forms. A certain amount of pressure from the international community is generally needed, so policymakers are already in a position to change an area. They then take a policy idea from somewhere else and apply it to their own country. This often occurs when there is a problem, such as climate change, to be solved, and then policymakers look for examples of what is being done elsewhere. This involves a large amount of policy diffusion and social learning.

In analyzing policy transfer and its key factors for consideration, it is important to think about how an instrument can address the needs and practices on both an EU and national level. To address serious problems, long-term solutions should be used. This means that future sustainable consumption policy must consider and address long-term goals and macroeconomic considerations, such as the structure and institutions of a country. Rather than targeting a specific problem in a vacuum, policymakers should look at how to change the structure of society that affects that problem. This would lead to a remodeling of the system, and would allow consumers to adjust, over a period of years, to a new way of thinking.

Policies to Promote Sustainable Consumption Patterns

Policy transfer is one part of EUPOPP's policy recommendations, to be considered when policymakers are presented with an area that needs improvement and development. As policymakers consider our policy recommendations from WP 6, they should also consider policy transfer as an option.



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