

narrating impact assessment in the european union

claudio m. radaelli^{a,}, claire a. dunlop^a and oliver fritsch^b*

^aDepartment of Politics and Centre for European Governance, University of Exeter, UK
E-mails: c.radaelli@ex.ac.uk; c.a.dunlop@ex.ac.uk

^bEnvironment and Sustainability Institute, Department of Politics and Centre for European Governance, University of Exeter, UK
E-mail: o.fritsch@exeter.ac.uk

*Corresponding author.

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Abstract

Since 2003, the European Commission has produced analytical documents (called Impact Assessments, IAs) to appraise its policy proposals. This appraisal process is the cornerstone of the regulatory reform policy of the European Union. Previous research has been concerned with the quality of the IAs in terms of evidence-based policy, usages of economic analysis and other standards of smart regulation. Instead, we move to a different perspective. We draw on the narrative policy framework to explore IAs as a text and discursive instrument. Conceptually, insights from discursive institutionalism are used to explore narratives as tools of coordination within complex organizations such as the European Commission, and as communicative tools through which policy-makers seek to enhance the plausibility, acceptability and, ultimately, legitimacy for their policy proposals. Empirically, we consider a sample of IAs that differ by originating DGs, legal instrument, and level of saliency. The findings show that both in coordinating and communicating policy, the European bureaucracy projects a certain definition of its identity via the narratives it deploys. The Commission may use IAs to produce evidence-based policy, but it also an active narrator. It engages with IAs to provide a presentation of self, to establish EU norms and values, and to create consensus around policy proposals by using causal plots, doomsday scenarios, and narrative dramatization.

Keywords European Union; impact assessment; learning; policy narratives; regulation

Since 2003, after a decade of experiments with various tools of policy appraisal, the European Commission has used the impact assessment (IA) procedure to support the policy formulation process in the context of the EU's 'smart

regulation' strategy (European Commission, 2010). The IA is a single template for the appraisal of different types of effects of policy proposals on economic sectors, the environment, and citizens. It also includes different tests on administrative obligations and competitiveness. Drawing on the international experience of using economic analysis to appraise policy proposals (OECD, 2009), the Commission is committed to the analysis of both legislative and non-legislative proposals via a series of steps described in the IA guidelines (see http://ec.europa.eu/governance/impact/index_en.htm). The IAs are published online when the accompanying proposal is formally agreed upon by the College of Commissioners. The process of preparing an IA includes problem definition, the identification of alternative feasible options, consultation, economic analysis of the possible choices, and a final policy choice – regulatory or not. For example, the IA may well conclude that a code of conduct is better than a directive.

The template for IA¹ is designed by the Secretariat General, which also has a coordinating role in individual appraisal processes. The Impact Assessment Board (IAB) is a regulatory oversight body. Its members are high-level officers from key Directorate Generals appointed in their personal capacity. It is chaired by the Deputy Secretary General.

Previous research has shown that IAs and regulatory oversight are relatively well-embedded in the EU policy formulation (Alemanno, 2008; Allio, 2008; Radaelli and Meuwese, 2010). The IA of the Commission draws on European and North-American experience with regulatory appraisal. Yet it is distinctive in two ways (Meuwese, 2008). First, it considers the social and environmental dimensions alongside the economic dimension of policy proposals, while other systems are eminently concerned with one dimension, typically the economic effects or

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sustainability. Second, there is no *a priori* preference for cost-benefit analysis (CBA) as the main method used to carry out economic analysis.

The literature on IAs in the EU, and more generally in Europe, is a growing field, and two systematic reviews are available (Turnpenny *et al*, 2009; Adelle *et al*, 2012), together with a meta-analysis of a sample of cases drawn both from the EU and the UK (Dunlop *et al*, 2012). Extant literature has discussed how the Commission handles the appraisal procedure in the context of individual policy sectors, showing when and how the officers deviate from their guidelines and benefit-cost principles (Torriti, 2010). The regulatory oversight dimension of the phenomenon is particularly important for its implications for the political control of the bureaucracy: on this the EU studies have connected with a large body of literature developed in the US on IAs as a control tool (Alemanno, 2011; Radaelli, 2010).

However, most of this literature is limited to two types of research questions: first, the governance characteristics of IAs, including who uses it and for what purpose (Nilsson *et al*, 2008; Radaelli, 2010); and, second, the trends in the types of tests and analyses contained in the IAs (Renda, 2006; Cecot *et al*, 2008; Fritsch *et al*, forthcoming). Thus, we know a good deal about how the assessments of the Commission differ from their North American counterparts and the role they play in evidence-based policy as well as in oversight policies. But IAs are also an important step in legitimizing policy proposals. Here, we focus on this step by conceptualizing IAs

as a script containing arguments used to justify a given definition of the policy problem and EU regulatory intervention. These arguments typically follow a narrative arc²: They present a problem and show how the situation will substantially improve, thanks to the initiative suggested by the Commission.

This leads us to a different perspective. We look at the narrative structure rather than checking on the type and quality of economic analysis or testing hypotheses about how economics is used by regulators (on the latter, see also Schrefler, 2010). To be clear, this is an exploratory enterprise and so, at a very basic level, we are agnostic about the presence or absence of narratives and ask a simple set of questions: Is the Commission a narrator when performing IAs? If so, what type of narrator is it? For example, do we find variability across the Commission or in relation to issue characteristics? By looking at the narrative structure and content of individual IAs, we explore narratives as tools of advocacy as well as inquiry (echoing Toulmin *et al*, 1984: 7).

In his review of 'Theories of the Policy Process' for the *Public Policy Yearbook* 2011, Nowlin (2011) puts the Narrative Policy Framework (NPF) at the top of his section on 'emerging trends'. The classic claim of the NPF is that public policy has a narrative structure. In turn, narratives have causal effects: they categorize or frame an issue in a peculiar way; they direct action towards certain actions; they expand the scope and tasks of the organization that dominates the narrative; they create conflict-resolution pathways via narrative synthesis and frame-reflection; and finally they reverberate in public opinion, linking public policy to collective perceptions (Roe, 1994; Jones and McBeth, 2010; Shanahan *et al*, 2011). Previous research has demonstrated that a narrative approach sheds light

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on how power and legitimacy for the Commission's intervention are generated in EU public policy (Radaelli, 1999).

Briefly, over the years narrative analysis has become one of the recognized modes of social scientific enquiry in EU public policy studies. Although narrative analysis does not present particular problems to EU scholars, we need to clarify its epistemological and ontological status – because on these issues the community of researchers is still divided. Indeed, narrative analysis has often been associated with post-empirical epistemologies of varying nature. Yet, Nowlin argues, NPF authors such as Jones and McBeth (2010) have shown that an interest in the narrative structure of public policy can also contribute to the more established effort to '*empirically measure* how policy relevant information is transmitted and interpreted by both policy elites and the mass public' (2011: 53, our emphasis). Indeed, narrative policy analysis can and should be reclaimed by political scientists that do not subscribe to post-modernism, post-structuralism or phronetic ontologies (on these approaches see Fischer and Gottweis, 2012; Hajer and Wagenaar, 2003; Flyvbjerg, 2001).

To understand this, one has to consider that social scientists often operate with a social ontology combined with an objective epistemology (Searle, 1995). Granted that entities such as narratives are representations of policy

created by social actors, and thus have an inter-subjective nature, they can still be examined empirically using an objective epistemology. This article shares this NPF combination of social ontology and objective epistemology. But it also represents an attempt to build on these broad ontological and epistemological claims by adding two research foci that have not yet crossed their path in the NPF (see Jones and McBeth, 2010, for the hallmarks of the NPF). The two foci are discourse (Schmidt, 2008) and the presentation of self (Goffman, 1959). By incorporating these two dimensions, we are able to expose the different purposes to which narratives are directed. Let us begin with discourse. According to Schmidt, the discursive aspects of policy-making fall in two categories. One is coordinative discourse, that is: how elites use discursive structures, to make sense of reality and coordinate their policy initiatives. The other is communicative discourse, that is: how policy narratives are communicated to pressure groups, the public and, more generally, the external environment in order to achieve legitimacy for the policy choice taken by elites. In our article, we explore narratives as tools of discursive coordination within a complex organization like the European Commission, and as communicative tools through which policymakers seek to enhance the plausibility, acceptability and, ultimately, legitimacy for their policy proposals. Both in coordinating and communicating policy, bureaucratic elites tend to project a certain definition of their identity via the narratives they deploy, most often in terms of the moral and normative assumptions behind policy choice. Here is where we need Goffman. Indeed, drawing on Schimmelfennig's insight that dramatic action is often present in international organizations (Schimmelfennig, 2001), we can follow Goffman (1959) in arguing that the presentation of self combines

narrative activity at the back and front stages.

In the next section, we introduce the idea of IAs as narratives. In the subsequent section we outline our research questions, data sample, and coding. Then in the latter section, we present our empirical analysis of the data. Since this is the first study to consider the narrative dimension of IAs, one aim of our analysis is to explore the variability and common features in our sample, rather than presenting specific hypotheses to be tested. We conclude with a discussion and suggestions for future research, including hypotheses that might usefully be tested in the future.

IMPACT ASSESSMENT AS NARRATIVE

(Why) should we look at IAs through the lenses of the NPF? The Commission uses IA documents to make the case for its proposals and to show how a given conclusion on the chosen option was reached. Thus, in a sense, the IA activity is all about persuading the reader that the accompanying proposal meets some criteria of evidence-based policy to which the EU is committed. Previous studies have also found that the Commission becomes a narrator to increase the scope and breadth of EU action in areas where consensus is particularly difficult to reach (Radaelli, 1999). But, there are also more specific issues to consider.

The guidelines of the European Commission (2005b, 2009c) have an explicit narrative structure. Indeed, we can match precisely the steps of the IA, and some features of argumentation and policy narratives (Roe, 1994; Toulmin, 1958). The IA, so the guidelines say, should start with a presentation of what the problem is. In terms of Toulmin's analysis of argumentation, this is the 'claim' made by the Commission.

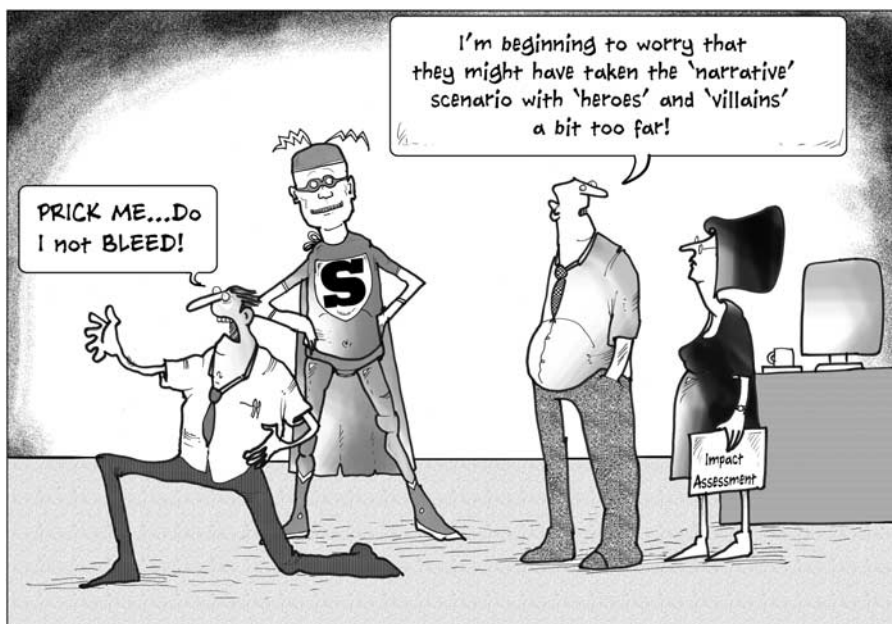
By identifying a problem, the Commission makes a given social, environmental, economic problem 'out there' amenable to human action within the EU policy-making framework. As mentioned, IAs follow a narrative arc: at the beginning they define a given problem, and then show (optimistically, indeed) how the problem can be acted upon via EU action. Roe (1994), this transformation of socio-economic problems into problems that are suitable for the policy agenda of an organization is an essential property of policy narratives.

The guidelines also specify that the officers should provide evidence supporting problem definition. Yet again, this corresponds to Toulmin's (1958) link between the 'claim' and the 'grounds' or evidence that is appealed to as a foundation for the 'claim'. Further, there is an explicit requirement to explain what will happen in the absence of EU action – the default option of no intervention. In Roe's (1994) narrative framework, the text describing 'what happens if we do not

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act together' is the worst-case scenario component of the narrative. By explicitly requiring an analysis of the 'do nothing' option, the IA guidelines stimulate authors to dramatize this scenario, often transforming it into a doomsday scenario where particularly bad policy outcomes are evoked. Finally, a good IA should describe a wide range of actors and sectors that can be affected by the proposed intervention. This is sometimes an aseptic list of those who are going to gain from the EU policy and those who are going to incur costs. But, in some cases, the IA transforms this list into something more, that is, following a classic feature of causal stories (Stone, 1988; Roe, 1994; Jones and McBeth, 2010), proper 'heroes' and 'villains'.

The IA document is thus a script with a narrative structure. One more observation



is in order: the IA script is related to both the 'frontstage' and the 'backstage'. The backstage is reflected in the sections of the IA portraying the coordination of policy among different DGs and policy elites more generally. The frontstage is where the IA content is displayed for the wider European public and member states. Following Goffman (1959), we suggest that activity on these stages combine to provide certain personae or presentations of self of the Commission. This means that although, in principle, the process of preparing the assessment should be entirely dedicated to evidence-based policy, the Commission, according to this conjecture, can manipulate it to establish norms, reiterate beliefs, define the range of acceptable and undesirable actions – in short, present itself. Different presentations are conceptually possible, from presenting the Brussels-based bureaucracy as a diligent agent of the European Parliament and the Council to more assertive presentations, including the presentation of an organization directly responsive to public opinion and the major stakeholders in the EU policy process.

These remarks concerning the front and the back stages have important connections with the discursive dimension of policy narratives. To see this, we need to relate IA to the policy formulation process. Before the introduction of the IA process in 2003, policy proposals were developed within a given Directorate General, subject to inter-service consultation and monitoring from the Commission's Legal Service and more generally the Secretariat General. Observers in the past noted the relative autonomy of the DGs in the preparation of proposals, and the weakness of the Secretariat General in providing robust coordination. Upon completion of their interview program within the Commission, Kassim and Menon (2004: 28) spoke of a 'collection of baronies' to highlight the relative autonomy of the DGs. The situation has

changed with the institutionalization of the IA process (Allio, 2008; Radaelli and Meuwese, 2010). Radaelli and Meuwese argue that the different preferences, constituencies and organizational cultures of the DGs are built into the IA process. DGs may have different ways of looking at policy problems. But they have been forced to articulate their opinions in terms of evidence, and consequently they have given up some bureaucratic autonomy – to other DGs and to the Secretariat General, which has gained in coordination capacity. This means that the process of preparing an IA has an important backstage role or, following Schmidt (2008), provides a platform for coordinative discourse. Tellingly, the IA document is finalized together with the proposal agreed upon by the College of the Commission. Up until the last minute, the Commissioners can utilize the IA and the draft proposal (say, a draft directive) to coordinate and agree. The scrutiny of the draft IAs by the IAB adds another element to the policy formulation network (Alemanno, 2008; European Commission, 2012). The Board has leverage to insist on the inclusion or exploration of certain issues, and steer coordinative discourse in one direction or another.

However, the IA is also a discursive tool in providing justification and legitimacy for the choices made. In this sense, the IA speaks to a broader audience, where there are both institutional publics like the European Parliament and the Council, and the various audiences of stakeholders. According to Schmidt (2008), this is communicative discourse, or the legitimizing function of a speech or text. In the case of the Commission, legitimacy is also intertwined with issues concerning the legal basis for intervention and the scope for EU action in areas where *prima facie* member states seem more equipped to solve problems.

To sum up then, the IA process and document can be examined through the

lenses of the NPF. In this section we made the case for a narrative analysis. IAs may be manipulated to provide a presentation of self by the Commission, going beyond evidence-based policy into the territory of norms, values and what an organization stands for and cares about. Finally, the IA as discourse has a coordinative function as well as communicative properties.

RESEARCH QUESTIONS, SAMPLE, CODING AND DATA

Our project emerged from the narrative approach (specifically the NPF), which suggests the following research questions: Does the Commission use IAs for narrative purposes? When this happens, what are the narrative features of IAs, specifically causal plots, doomsday scenarios, dramatization, heroes and villains, moral reasons for action and other elements associated with narrative policy analysis? Does the Commission as narrator exploit the IA process to offer certain presentations of self and establish norms? Finally, how do the IAs perform in relation to communicative and coordinative discourse? To answer these questions, we provide a suitable sample and originate data. The Commission experimented with IAs in the period 2003–2005 (Allio, 2008). After that, IA has become a pretty stable, routine-like feature of policy formulation. This suggests that we do not need to examine IAs carried out before 2006.

To analyze a certain number of IAs in-depth, we did not want to censor our sample. With this in mind, we adopted the following three criteria for inclusion: binding versus non-binding proposals (like Communications); low versus high saliency issues; and DGs that historically have been very close to the smart regulation agenda of the EU versus more peripheral DGs, which have either con-

tested or have simply been less interested in this agenda (Allio, 2008). This way we control for whether the appraisal supports legislative or non-legislative proposals, the politicization of policy issues, and organizational culture. The combination of these criteria provides eight possible combinations in a truth table that drove our selection of cases. In consequence, we selected eight IAs summarized in Table 1.

In order to analyze these eight IAs systematically, we developed a coding frame (a scorecard) consisting of 23 items. In terms of measurement, our coding framework contains three types of items: first, those reporting on the presence or absence of a narrative feature, resulting in a simple 'yes/no' score; second, those presenting information about the presence or absence of a narrative feature ('yes/no'), supported by extensive qualitative evidence such as quotations; and, third, those providing qualitative evidence related to specific categories or ideal types (see, for instance, 'Genre' or 'Characters').

The eight IAs were coded blindly by each of the three authors, resulting in 24 completed scorecards per IA. These scores were subsequently aggregated with a view to produce one master scorecard per case. Across all cases, we were able to code on average 79 per cent of the variables. However, due to the aggregation of scores into master scorecards we reached 100 per cent coverage for all IAs. Inter-coder reliability was slightly above 90 per cent; cases of conflicting scores were resolved in a discursive process among the authors. It became clear that the 2006 IA on mercury is particularly short because it draws on extensive IAs carried out for the overall strategy of the Commission on mercury (European Commission, 2005a). Hence we coded the mercury directive IA taking into account the narrative elements that appear in the previous 'mercury strategy' IA.

Table 1: Sample

IAs selected (lead DG, year in which the assessment was concluded, reference)	Shorthand name	Core DG	High saliency	Legally binding
Proposal for a regulation concerning trade in seal products (ENV, 2008; European Commission, 2008)	SEALS IA	+	+	+
Communication on a European initiative on Alzheimer's disease and other dementias (Health Consumers, 2009; European Commission, 2009b)	ALZHEIMERS IA	+	+	-
Report on the possibilities of further improving the environmental characteristics of recreational craft engines (ENTR, 2007; European Commission, 2007a)	RECREATIONAL CRAFTS ENGINES IA	+	-	-
White paper on sport (EDULCULT, 2007; European Commission, 2007b)	SPORT IA	-	-	-
Protecting Europe from large-scale cyber-attacks and disruptions: enhancing preparedness, security and resilience (INFOSOC, 2009; European Commission, 2009a)	CYBER IA		+	-
Directive on a common consolidated corporate tax base (TAXUD, 2011; European Commission, 2011a)	COMMON TAX IA	-	-	+
Directive on restrictions on the marketing of certain measuring devices containing mercury (ENTR, 2006; European Commission, 2006)	MERCURY IA	+	-	+
Directive on a common system of financial transaction tax (TAXUD, 2011; European Commission, 2011b)	FINANCIAL TRANSACTION TAX	-	+	+

EMPIRICAL ANALYSIS

The first result is that the IAs have a narrative dimension. This is not a general feature, however. The Commission is a narrator, but not always. In five cases there is a plot – without a plot, we cannot talk of narrative structure. Of our three selection criteria, only the legally binding nature of

the initiative is moderately associated with the presence of plots (four cases out of five; saliency occurs in three cases; core DGs are involved in only two of the five cases with a plot). Drama or doomsday scenarios are represented in seven of the IAs. Heroes or villains appear in six.

The fact that the Commission can play the role of narrator should not be seen

necessarily in opposition to economic analysis. The TAX IAs are particularly strong both in terms of narrative and economic analysis. One can reason that evidence-based policy (or, in a narrower definition, economic analysis) does not exclude the narrative dimension. Six of the studies contain no CBA – but recall that the Commission has not assigned priority to this method. Two of the four studies that do deploy some economic analyses underline the uncertain nature of some of the data they use (MERCURY IA and CYBER IA).

Narratively strong IAs can also be used to bypass the boundary between 'evidence-based' policy and more political considerations. Essentially, the IA is written by authors taking seriously some 'readers over their shoulders', often the member states. When this happens, the officers deploy arguments and evidence to show that some likely reservations have already been taken care of. In the COMMON TAX BASE the Commission entered directly into the pre-negotiating stage by using simulation data to iron out the possible hostile reactions of revenue authorities in the member states – the proposal was developed over more than a decade of studies and pilot exercises. Practically, this IA wants to show that the possible negative reaction of country X has already been countered by simulation Y. This illustrates that the IA purpose includes, but goes beyond, providing the substantive evidence-based support to a decision. It may also serve to improve on policy formulation considering a wide range of dimensions, some evidence-based in the sense of economic analysis, some still in a sense evidence-based, but related to expectations about the political reactions to different options made by the Commission. Pragmatically, it makes sense to operate this way, instead of bracketing the political out of the IA discourse.

We should further qualify that the commitment to evidence-based policy is

associated with candid acknowledgements of uncertainty and limitations in the data, thus generating more opportunities for argumentative-narrative considerations. For example, in the CYBER IA, before analyzing the policy options it is noted that '... trustable data to base the analysis on are not readily available' (European Commission, 2009a: 26). The SEALS IA offers another example. The first paragraph of the Executive Summary starts with:

[I]n line with its commitment to high animal welfare standards, the European Commission undertook to conduct an objective, in-depth analysis of the animal welfare aspects of seal hunting in sealing countries ... there are only a limited number of studies ... that can be used to evaluate with a high degree of certainty the efficacy of the various killing methods...there is reported evidence that in practice effective killing does not always happen and some animals are killed and skinned in a way, which causes avoidable pain, distress and other forms of suffering. (European Commission, 2008: 8)

But, then much later in the script the language is toned down further still, observing that:

[P]olicy decisions will have to be taken on limited information. EFSA stated clearly that there was a scarcity of robust, scientifically peer reviewed data. (European Commission, 2008: 45)

In the absence of a robust evidence base emphasizing the logic of necessity, narratives are used to connect the dots and to provide foundations for policy action, transforming unconvincing evidence into problems that are amenable to human action.

Cognitive dimensions are nested into deeper-level core norms. Consistent with the claim that the EU texts project

both 'the EU as it' and 'the EU-topia' (the EU as it ought to be, see Nicolaidis and Howse, 2002), we found the core norm of integration is extended beyond trade and markets. Integration – the IAs argue – brings together communities of professionals, researchers, and people beyond the boundaries of the nation-state. Integration brings down barriers between countries, and ought to be considered a valued aim in EU-level action: this norm is represented in all of the IAs, to some extent. The ALZHEIMER IA exemplifies not only the cognitive but normative importance of developing and coordinating EU communities of practice:

[I]n addition, the main added-value of collaborative health research at Community level is obtained from transnational cooperation, the integration of relevant activities and participants, and the concentration of European effort on fewer priorities. In particular, EU health research brings down barriers between countries, via multinational consortia and coordination of national funding programmes; enforces cooperation between different types of organisations: universities, research centres, hospitals, SMEs, large companies, foundations, or patients' organisations. With its increased focus on translating basic discoveries into clinical applications (translational research), it also promotes cooperation between scientific disciplines, bringing together researchers, engineers, clinicians and industrialists. (European Commission, 2009b: 16, emphasis added)

But, there is a deeper, and fundamentally more political, sense in which normativity enters many of the IA texts. The IAs in our sample provide several assertions along the line that action by individual member states is inefficient, fragmented and inconclusive, and therefore EU-level coordination brings coherence and a 'single voice' into policy

action. By itself the fact that EU-action means a 'single voice' is a tautology, the problem being whether subsidiarity is violated or not. In the SEALS case, however, the IA is candid about using the appraisal not so much to establish norms, but to increase the credibility of the Commission:

[T]he aim of this initiative is in line with the Commissions' strategic objectives and better regulation principles notably to provide effective and efficient measures, ensure a high level of legal certainty across the EU, and thus help to strengthen the Community's credibility in the eyes of its citizens. (European Commission, 2008: 20)

Let us now turn to our question about coordinative and communicative discourse. Consider coordination first. DGs, the Secretariat General, and the IAB interact in the preparation of the assessment. The SPORT IA was particularly proud of the 'strong collegial approach' involving no less than 17 DGs in the preparation and evolution of the document. The ALZHEIMER IA is also instructive. Developed by the Health and Consumers DG in association with the Directorates-General for Employment, Social Affairs and Equal Opportunities (DG EMPL), Research (DG RTD) and Justice, Freedom and Security (DG JLS), plus the supervision of the Secretariat General, this is clearly a rich policy formulation network that looks very different from the autonomous baronies of the past. Indeed, the IA steering group met formally three times to coordinate on form and content of the ALZHEIMER IA. This point towards the claim that the ALZHEIMER IA is able to reflect the preferences of different constituencies: public health, employment, the promotion of research across the EU, fairness and rights.

Five of our IAs used endorsements of expert groups to underline the credibility

of the policy action proposed. For example, in the ALZHEIMER IA, the officers in charge of policy formulation orchestrated a panel of experts on Alzheimer disease and dementia, which was convened eight days before the IA was sent to the IAB for scrutiny. The IA is very transparent on how the panel was used to build legitimacy – and more importantly still to endorse the need for more action at the EU level in this field, as shown by the final part of this sentence:

[T]he Panel broadly endorsed the impact analysis and options considered by the Commission, whilst also providing many references and data that enabled to more clearly define the context of the problem in the field of Alzheimer's disease and dementia, to further develop the option of a platform for voluntary cooperation at European level, and to reinforce the impact analysis of Community action in this area. (European Commission, 2009b: 4)

The CYBER IA goes further still – actually including a photograph of expert workshops convened on the subject which is labeled as ‘consensus development at experts’ workshop’. Two further techniques are central in the Commission’s coordination of elite action. The first concerns the identification of actors characterized as ‘villains’ – perpetrators of the policy problem – and how they related to the Commission as policy architect. Five IAs identified actors that can be categorized as villains. What is notable here is that the vast majority of the villains were presented as actors or forces that did not respect the traditional nation state boundaries – illness and time (ALZHEIMER IA); transnational criminal networks (CYBER IA; SPORT IA), and non-EU countries where seal culling management systems are ‘underdeveloped’ (SEALS IA). Thus, with these villains to confront, the Commission – as

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The second narrative technique used as a rallying call to policy elites concerned the presentation of time and creation of policy urgency. In five cases from our IA sample, temporal language or allusions to time were deployed to engender a sense that policy action should not be delayed. For example, in the CYBER IA:

'cyber-attacks have risen to an unprecedented level of sophisticationICT infrastructures are under constant attack and if Europe does not prepare itself the impact would be much more severe' where the field is marked by a 'phenomenal growth'. (European Commission, 2009a: 3)

Similarly, in the COMMON TAX BASE IA tax obstacles are now ‘more and more evident and detrimental’ (European Commission, 2011a: 14) and in the ALZHEIMER IA, the shadow cast by the future increase in illness rates and health costs of the ageing population is an ever-present theme in the text.

As well as enabling the Commission to coordinate policy construction and present itself to its policy partners, discursive narratives have wider communicative functions. The Commission must not simply gather ideas and evidence

that go into the problem and policy solution being proposed; it must also generate a sense of legitimacy for policy action, and locate it within the bigger picture of what that action means for the EU project as a whole (or the EUTOPIA, Nicolaidis and Howse, 2002). In her analysis of the institutional dimension of interactive discourse, Schmidt notes that the balance of coordinative and communicative discourse is, in part, a function of the institutional make-up of the political system being studied. In a multi-actor, highly compound system such as the EU where power is dispersed, we would expect coordinative discourse to dominate (Schmidt, 2006). However, the concentration on communicative discourse in our sample of IAs was striking. The Commission does not exploit IAs to communicate directly with the European public. However, the IAs are platforms to rehearse arguments and legitimize its own involvement in the issue at hand, as well as the actual substance of the policy being proposed.

Drama is key in constructing a sense of legitimacy. Dramatic tension is injected in seven IAs through use of both emotive language in relation to who is affected by a problem and what will be lost if no action is taken – these take the form of what we term ‘doomsday scenarios’ where the worst case scenarios are either remembered or postulated. The use of the doomsday scenario is found where the Commission justifies its proposal for action in the CYBER IA by emphasizing how ‘vital’ that sector is for all segments of society evoking the logic of learning from a past ICT security failure. With these villains to confront, the Commission – as supranational entity – becomes the lynchpin in policy construction, problem analysis and stakeholder mobilization:

[D]iscussions after the Estonian attack suggest that the effects of similar

events can be limited by preventative measures[T]he Commission, fully respecting the subsidiarity principle, is ideally placed to coordinate such efforts.... (European Commission, 2009a: 4)

The issues considered are often mundane low politics matters, but they are discursively linked to grandiose declarations and solemn texts. This discursive anchorage perhaps brings more leverage to the proposal or simply tries to magnify issue relevance. One key technique deployed to give policy a sense of orientation within the wider EU project is to link it to previous directives, declarations and Treaties. In the SPORT IA, faced with no competence in the area, the Commission’s policy scope is presented as follows:

[T]he interaction between sport and EU law as well as the role of sport within EU policies ... has not been addressed in a comprehensive manner and needs to be illustrated in order to give orientation on how to take into account the existing texts at EU level that relate to sport. (European Commission, 2007b: 9)

In some cases, the Commission moves beyond justifying action in legal terms alone. For example, in the SEALS IA the Commission pressed home the idea of policy action as its part of a legal commitment to particular animal welfare standards but also as its moral duty both to seals as sentient animals and also to an expectant European public noting the ‘high level of public concerns regarding animal welfare aspects of seal hunting’ (European Commission, 2008: 6). The SPORT IA offers a similar concern – by not becoming involved and pushing a policy forward, the Commission would be guilty of not living up to its responsibilities and promises to the EU public’ (European Commission, 2007b: 20).

When the coordinative and communicative narratives techniques are combined, the result is akin to the Commission adopting different personae or presentations of self (Goffman, 1959). The Commission, like other organizations performing in a dense environment, engages in the strategic presentation of self, and the manipulation of frames. Frank Schimmelfennig (2001) made this claim drawing on Goffman (1959), and with reference to the overall behavior within the international community. Since we are concerned with the Commission, what matters is how this organization introduces a presentation of itself as responsive to its policy partners, other EU institutions and EU citizens. This self-presentation may be less or more important than others (such as presenting the Commission as an organization dedicated to evidence-based policy), following Goffman (1959) much depends on the 'definition of the situation'. The IA also provides the opportunity to suggest a presentation of self as 'evidence-led organization'. But also, depending on the subject matter, the Commission can present itself as an upholder of certain values and beliefs in governance, the market, and human rights.

In our analysis, we found multiple presentations of self (see table in the Appendix). Space constraints prevent us from outlining each of the personae, but three of the recurrent ones are explored here in more depth. The first was expected and is present in every case: since the IA process is informed by the smart regulation agenda and evidence-based policy ideal, the Commission presents itself as *an evidence-based organization* dedicated to the dispassionate scrutiny of empirical evidence to meet the expectations of its European public. A variation of this presentation is the *calm, responsible, gentle giant* – quite evident in the COMMON TAX BASE, MERCURY, SEALS AND ALZHEIMER IAs. For example,

the COMMON TAX BASE IA argues that the Commission took responsibility for direct corporate tax coordination at least since 1992, and lists with pride all the initiatives, studies, and proposals in the two decades since that date. The Commission is committed to evidence-based policy, but this commitment is reinforced by a long-standing responsibility as custodian of the single market. Given this responsibility, the Commission does not follow the vagaries of political mood. Instead, it cumulates evidence for the 'good cause', study after study, communication after communication, proposal after proposal. Similarly in the MERCURY case, the Commission is conscious of its position as a significant exporter of mercury and the consequences of further additions to the global pool.

But there are also other presentations of self that are less in line with the evidence-based policy agenda. Four IAs show a *diligent, responsive agent*, in tune with the expectations of governmental and non-governmental actors, as well as citizens. Indeed, the SPORT IA has a whole section entitled 'a clear political demand' (Section 3.2.3.1). But, it is in the discussion relating to taking the 'No Action' option that this responsive persona is most explicit:

[N]o action would finally mean not drawing any lesson from the repeated calls by governmental and non-governmental actors to better promote sport at EU level, and to raise the visibility of the social and economic potentials of sport. (European Commission, 2007b: 22, our emphasis)

Another example is the RECREATIONAL CRAFTS ENGINES IA, where it is argued that the identification of the problem as one of improving on emission was made by the European Council and the Parliament, who 'have requested the Commission to report on the possibilities

of further improving the environmental characteristics of recreational marine engines' (European Commission, 2007a: 2). Thus, here the Commission is again depicted as a diligent and responsive institutional citizen.

DISCUSSION AND CONCLUSIONS

While previous research has focused on the quality of IAs as tools for evidence-based policy and smart regulation, we have explored a different perspective, drawing on the framework developed by Roe (1994) and, recently improved by Jones and McBeth (2010). We found empirical evidence that the Commission has used IAs to promote its narratives. However, there are also cases in which the Commission has limited or no interest in narrating. Future research will have to explore the conditions that trigger or hinder a narrative mode. By considering the narrative dimension, we were able to find that the IA is a useful tool to bypass the boundary between technical and political appraisal of proposals. We found evidence that the IAs may usefully address political concerns and enter the pre-negotiation stage so to speak. Given that a current theme in the political discussion is about the independence and technical objectivity of the IAs, our evidence suggests a completely different perspective. Instead of seeking unrealistic aseptic 'essays', we should reason that this tool may also improve on policy formulation by addressing political concerns via empirical analysis and reasoned argumentation. This makes the IA more interesting and useful to decision-makers (like the Commissioners) and elected politicians in the European Parliament and the Council. Perhaps it makes sense to operate this way, instead of bracketing the political out of the IA discourse. This might be noted with the

following caveat: the bridge between the technical and the pre-negotiating stage should be built upon evidence, otherwise the credibility of the whole exercise will suffer irremediably.

The Commission may or may not exploit IAs to produce economic analysis of legislation or to stick to other standards (such as consultation, problem definition, examination of alternatives to traditional regulation) of what is now called smart regulation (European Commission, 2011c). To establish this, one needs research designs of the type used in the past by evaluators and academics (The Evaluation Partnership, 2007; Fritsch *et al*, forthcoming). But no matter how engaged the Commission is with smart regulation, it is engaged with causal plots, doomsday scenarios, heroes and villains. It also makes use of the IAs to establish norms and provide different presentations of self, in order to increase legitimacy. Future research could establish whether the use of IA to present personae and to establish norms is a unique feature of the Commission, or it also affects other producers of IAs, such as US federal executive agencies and UK departments. To do this, one has to extend the analysis to samples from countries like the UK and the US.

Narrative techniques are deployed quite skillfully by the Commission, a talented writer who can write in different genres. Specifically, we found examples of the problem-solving handbook; the thriller story; the manifesto for policy action, and the thematic essay. The less interesting cases (from a narrative point of view) belong to the flat 'homework' genre or the 'revise and resubmit' essay, when the IAB makes critical remarks and the main preoccupation of the authors is to show compliance with the IAB suggestions rather than engaging with the narrative. The ultimate aim of this article has been to generate evidence leading other researchers to generate hypotheses.

Tentative avenues for more research on policy narratives in the field include the type of policy arenas and readers-stakeholders, the role of narratives in creating target populations for the Commission, and the interplay between economic analysis and narrative analysis.

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Notes

- 1 Individual Directorates-General have additional guidance documents that add to the single template but do not substitute it.
- 2 We are grateful to Janice Morphet for suggesting this characterization.

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APPENDIX

Table A1: Analysis of Impact Assessments

	MERCURY IA draws on a large 2005 IA for the Communication on mercury strategy	RECREATIONAL CRAFT ENGINES IA	SPORT IA	SEALS IA	ALZHEIMER IA	CYBER IA	COMMON TAX BASE IA	FINANCIAL TRANSACTION TAX IA
ID	SEC(2005) 101	SEC(2007) 819	SEC(2007) 932/2	SEC(2008) 2290	SEC(2009) 1040	SEC(2009) 399	SEC(2011) 315	SEC(2011) 1102
Lead DG	Environment	Enterprise	Education and culture	Environment	Health and consumers	Information society and media	Taxation and customs union	Taxation and customs union
DGs involved	Lead DG, plus SG	Lead DG only	17 DGs	Lead DG only	4 DGs	11 DGs + SG	Lead DG only	6 DGs + SG
Type	Directive	Communication	White paper	Regulation	Communication	Communication	Directive	Directive
Length	Long	Short	Short	Long	Short	Long	Long	Long
Triggered by EP and Council	Yes	Yes	No	No	Yes	No	Yes	No
Problem	Health-related	Environmental	Political: Extending regulatory competences of the Commission	Normative: Responding to normative beliefs held by European citizens	Information base: Lack of coordination among member states when it comes to sharing research findings and information	Security-related: Lack of coordination among member states	Technical: Tax barriers	Political: Lack of coordination among member states
Identity/Presentation of Self	Evidence-based organization; Diligent agent; Gentle civilized	Evidence-based organization; Diligent agent	Evidence-based organization; Strategic actor looking for policy	Evidence-based organization; Diligent	Evidence-based organization; Gentle civilized global power	Evidence-based organization; Strategic actor able	Evidence-based organization; Gentle	Evidence-based organization; Diligent agent; Custodian of the

	global power concerned with fairness; Foresightful actor		spill-overs; Horizontal organization able to respond effectively on cross-cutting issues to an expectant public and stakeholders	agent; Gentle civilized global power concerned with fairness	concerned with fairness; Possible repository of data and best practice; Promoting NGOs; Oriented to new cutting-edge research	to cross over the boundaries between technical and political	civilized global power concerned with fairness; Organization oriented to long-term goals	single market; Fairness-oriented
Types of evidence	Inconclusive quantitative evidence related to health and economic impacts	Evidence and consultation	No empirical evidence, yet statements making the case for a political commitment of the Commission	Qualitative studies, many of them non-scientific, and consultation	Values and collective responsibility	Evidence in support of a political commitment to overcome fragmented action	High number of various studies aggregated in one document	Economic analysis and political commitment
Characters	Consumers, artisanal miners, producers and traders, fishing industry, industrial sectors such as power generation	Industry, environmental agencies, individual firms	Citizens, minors, athletes, sport NGOs, sport federations, domestic policy-makers	Animals, EU citizens, non-EU citizens, local communities, hunting countries	Patients and their families, NGOs, researchers, residential care staff	Business, citizens, public administrations	Business firms, revenue authorities, jobholders	Financial sector, revenue authorities, different income groups
Causal plot	Yes	No	No	Yes	No	Yes	Yes	Yes
Heroes or villains	No	No	Yes Hero: European Commission responding to public and stakeholders Villains:	Yes Heroes: sentient seals Villains: countries with weak enforcement	Yes Heroes: patients, their families, carers, researchers Villains:	Yes Hero: European Commission Villains: those who perpetrate attacks	Yes Hero: European Commission has identified problem long time ago	Yes Hero: European Commission protecting single market and handling the economic crisis

Table A1 (continued)

	MERCURY IA draws on a large 2005 IA for the Communication on mercury strategy	RECREATIONAL CRAFT ENGINES IA	SPORT IA	SEALS IA	ALZHEIMER IA	CYBER IA	COMMON TAX BASE IA	FINANCIAL TRANSACTION TAX IA	
Meta-narrative	No	No	No	criminals encouraging doping	and training or with insufficient data Yes Secondary narrative: seal hunting as dark, mysterious business, EU action is also needed to improve our knowledge	No	No	No	with fairness Villains: greedy bankers Yes Main narrative: raising income, secondary narratives focus on protecting the single market from distortion and fragmentation
Metaphors	No	No	No	No	No	No	Yes	Yes	No
Expert Endorsement	No	No	No	No	Yes	Yes	Yes	Yes	Yes
Conflict	Yes	Yes	No	No	Yes	Yes	No	No	Yes
Type of support for choice	Economic analyses, studies from toxicology and medicine	Compliance costs, environmental impact assessments	No empirical evidence	No	Distributional conflict among member states Descriptive evidence, norms, analysis of current compliance	Norms	Evidence from ec. data, consultation and case studies	Economic analysis and consultation	Economic analysis

Criteria	Cost-effectiveness	MCA focusing on efficiency, effectiveness and consistency	Reasoning informed by strategic commitment of the Commission	Reasoning informed by qualitative empirical evidence and data	Qualitative reasoning	Qualitative reasoning	Maximum net benefit in a macro-economic outlook	Assessments of various impacts following different criteria
Dooms	Yes	No	Yes	Yes	Yes	Yes	Yes	Yes
Drama/Emotive	Yes	No	Yes	No	No	Yes	Yes	No
Temporal	No	Yes	Yes	No	Yes	Yes	Yes	No
Urgency								
Wider questions	Yes	No	Yes	No	No	Yes	No	No
Rebut	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Conclusion	No	No	No	Yes	Yes	Yes	No	Yes
Genre	Handbook for problem solving	Homework for problem solving	Manifesto	Handbook for problem solving	Essay on a theme	Thriller	Handbook for problem-solving	Manifesto

About the Authors

Claire A. Dunlop is a Senior Lecturer in political science at the Department of Politics at the University of Exeter, in the UK. Her research interests centre upon the politics of expertise, epistemic communities, risk governance and the science–policy interface. Most recently, she has published research articles in *Political Studies*, *Regulation and Governance*, *Journal of European Public Policy*, *Policy Studies*, *Policy Sciences* and *Public Management Review*.

Oliver Fritsch is a Lecturer at the Department of Politics of the University of Exeter and affiliated with Exeter’s Environment and Sustainability Institute. He is also the editorial office manager of the *European Journal of Political Research*. His main research interests are public sector organisations and organisational reform, stakeholder and civil society involvement in policy making, as well as environmental politics. He has recently published peer-reviewed articles in *Public Money & Management*, *Environment and Planning A*, *Ecological Economics*, *Environmental Policy and Governance*, and *Environmental Management*.

Claudio M. Radaelli is Professor of Political Science and Director of the Centre for European Governance at the University of Exeter. His research interests cover the fields of regulation, Europeanization, and policy analysis. He co-edited *Research Design in European Studies* (Palgrave, 2012, with Theofanis Exadaktylos), *Politics in Italy* (Berghahn Books, 2013, with Aldo di Virgilio) and co-authored *Research Design in the Social Sciences* (Sage, 2013, with Martino Maggetti and Fabrizio Gilardi).