

EUROPEAN INTEGRATION AND THE ADMINISTRATIVE STATE

A longitudinal study on self-reinforcing administrative bias

Nadja Kühn and Jarle Trondal

ABSTRACT The study demonstrates how the EU contributes to a self-reinforcing administrative bias due to domestic-level organizational factors. Strong European integration without membership reinforces a politico-administrative gap and this gap expands over time. The paper applies an extreme case of high integration without formal EU membership represented by Norway. The findings suggest that the EU contributes to reinforce the administrative state through strong unintended assimilation effects. The findings are probed by a novel and comprehensive longitudinal data-set consisting of a large-N single case (N=3562) questionnaire study among government officials at three points in the Norwegian central administration: 1996, 2006 and 2016. Theoretically, the paper examines the role of organizational factors in administrative integration and how the impact of the EU is mediated by organizational variables at the national level.

KEY WORDS administrative integration, administrative state, central administration, Norway, organizational approach

INTRODUCTION

The “Administrative State”, originally coined by Dwight Waldo, emphasizes the central role of public administration in democratic governance (Olsen 2018; March and Olsen 1984: 741; Waldo 1947). This paper presents a single case study that shows the profound and rising role

of public administration in the multilevel governing system of the European Union (EU). A recent branch of literature has documented an emergent European multilevel administrative system (MLA) consisting of strongly interconnected administrative bodies across levels of governance (cf. Bauer and Trondal 2015). Administrative capacity-building by stealth at the EU-level is seen as challenging administrative autonomy among the member-state governments (e.g. Genschel and Jachtenfuchs 2014; Trondal 2010). These studies also suggest how the an organizationally heterogeneous EU sends a plethora of differentiated 'signals' to the member-states, for example how the Council fuels strong member-state coordination and perceptions of national preferences whereas the Commission fuels a circumvention of domestic political control and privileges non-majoritarian bodies (e.g. Egeberg et al. 2003; Trondal and Veggeland 2003). This paper makes two contributions to this literature:

- Theoretically, it examines the role of organizational factors in administrative integration and thus advances an organizational approach to public governance (Egeberg and Trondal 2018; Olsen 2018). This theoretical approach emphasizes how organizational factors bias governance processes. By biasing and nudging actors' attention towards certain problems and solutions, certain policy outcomes more likely than others. Administrative integration, this paper argues, is nudged by 'favorable' organizational conditions at the *domestic* level of government.
- Empirically, the paper demonstrates how the EU contributes to a self-reinforcing administrative bias due to domestic-level organizational factors. Strong European integration without membership reinforces a politico-administrative gap and this gap expands over time. The paper applies an extreme case of high integration without formal EU membership represented by Norway. The data suggests that the EU contributes to reinforce the administrative state through strong unintended

assimilation effects. To demonstrate how essential parameters of domestic public governance are profoundly influenced by the EU even in a non-EU member-state, the paper presents a novel *longitudinal data-set* consisting of a large-N (N=3562) questionnaire study collected by the authors among government officials at three points in the Norwegian central administration: 1996, 2006 and 2016. The self-reinforcing administrative bias is illuminated by Norwegian government officials dealing with the EU being increasingly loosely coupled to the political level (low-ranked staff) and (surprisingly) and tightly interwoven and influenced by EU institutions.

The paper contributes to a 'public administration turn' in EU studies (e.g. Bauer and Trondal 2015; Egeberg 2006; Trondal 2007). Essential to this turn has been to understand the role of administrative actors in political-administrative life of the EU (Olsen 2018). The inherent state prerogative of preparing policy-making and getting things done has been challenged by the rise of independent and integrated administrative capacities at the EU level. The supply of organizational capacities inside the European Commission – together with the rise of EU agencies – has enabled an emergent EU-level executive order to act independently of domestic government institutions (Egeberg and Trondal 2017). Moreover, organizational capacities of EU-level administrative actors supply them with a capacity to influence non-majoritarian institutions (agencies) at domestic level (e.g. Egeberg 2006). This paper shows how the impact of the EU is mediated by organizational variables at the national level. Moreover, This study provides novel data from the *core-executive* level of government (ministerial departments), and thereby adds to a literature that empirically has been dominated by studies of agencies. Methodologically, the empirical probe is hard by examining

the government administration of a formally non-EU-member state – the Norwegian central administration. As such, the paper contributes to studies of external differentiation of the EU and the external effects of EU norms and rules beyond EU borders (see Rittberger and Blauberg 2018). Still, compared to contemporary instances of EU external governance, Norway is by far the most strongly integrated EU non-member through a dense web of institutionalized relations (Egeberg and Trondal 1999; Lavenex 2011; Fossum and Graver 2018). This affiliated status grants the Norwegian central administration privileged access to most parts of the EU administration, which in turn paves the way for deep administrative integration. Moreover, administrative integration might go even further in affiliated non-member states than in member states due to their exclusion from political representation at EU level. This paper shows how a lack of political representation in the Council (and the European Parliament) mobilizes an administrative bias in the core-executive of government. Consequently, integration may happen more easily by stealth in affiliated states such as Norway – even though the official position is not to become a political member (Majone 2005).

The paper is presented as follows: The next section outlines an organizational approach to administrative integration beyond membership. The next section presents the data-set and methodology succeeded by a presentation and discussion of empirical findings. The paper concludes with key findings and some suggestions for future research.

AN ORGANIZATIONAL APPROACH TO ADMINISTRATIVE INTEGRATION

Public administration is not a technical apparatus or tool in the hands of shifting governments. An organizational approach emphasizes that public administration might be an

important agent in its own right. This theoretical framework is grounded on the assumption that internal organizational characteristics of public administration may explain *how* it works and changes. Consequently, organizational factors help explaining just how domestic ministries ‘adopt’ the influence of the EU – and thus how integration may happen even without formal EU membership and affect the pursuit of domestic public governance (Egeberg et al. 2016; Egeberg and Trondal 2015; March and Olsen 1989; Olsen 2009: 24; Trondal and Bauer 2017).

The literature harbour competing ideas on the extent to which actual decision behaviour reflects the organization structure within which actors are embedded – such as public choice theories, organizational sociology, and representative bureaucracy (see Niskanen 1971; Meyer and Rowan 1977; Meier and Capers 2012). While some observers ascribe lack of government action to political leaders’ lack of will, this paper advocates that political will is profoundly shaped endogenously by organizational positions which also enable (and constrain) action. This paper follows what Johan Olsen (2018) recently coined the “Bergen approach” in political science, emphasizing the organizational dimension of politics. An organizational approach posits that organizational factors are not merely an expression of symbol politics (Meyer and Rowan 1977; Brunsson 1989) but create systematic bias in human behaviour and decision-making processes by directing and nudging choice and attention towards certain problems and solutions, i.e. making certain outcomes more likely than others (Bækgaard 2010; Gulick 1937; Hammond 1990; Thaler and Sunstein 2009). Contemporary organization theory literature focuses on the explanatory power of organizational factors (Egeberg 2012; Egeberg and Trondal 2018). Two reasons are given for focusing on organizational structure: First, empirical studies demonstrate the systematic and significant

effect of organization structure on decision-making behaviour (e.g. Christensen and Lægreid 2007; Trondal 2006; Egeberg et al. 2016). Secondly, organization structure, compared to other factors that intervene in the policy process, is likely to be more subject to deliberate change and may thus be an important design instrument of the context of choice in public governance (Egeberg et. al 2016; Thaler and Sunstein 2009).

An organization structure is a normative structure composed of rules and roles specifying, more or less clearly, who is expected to do what, and how (Scott and Davis 2016). The structure regulates actors' access to decision processes, broadly defines the interests and goals that are to be pursued, delimits the types of considerations and alternatives that should be treated as relevant, and establishes action capacity by assigning certain tasks to certain roles. It influences decision-making behaviour by providing individuals with 'a systematic and predictable selection of problems, solutions and choice opportunities' (March and Olsen 1976). Whilst organizational structure does not necessarily predict nor determine actual decision-making behaviour, it does make some choices become more *likely* than others (e.g. Egeberg and Trondal 2018). This happens by regulating actors' access to decision situations, mobilizing attention to certain problems and solutions, structuring patterns of conflict and cooperation (and thus influencing power relationships), and enabling coordination and steering along certain dimensions rather than others. This entails that organizational factors do not impact *directly* on society; rather, societal consequences can normally only occur *via* governance processes and public policies. Bounded rationality (Simon 1957) is one of three key mechanisms that connect role expectations to actual behaviour; the organizational structure helps simplify actors' cognitive worlds by directing attention towards a selection of possible problems and solutions and ways to connect them. This concept holds that decision-

makers operate under three limitations: limited information about possible solutions and alternatives, limited cognitive capacity to evaluate and process information, and limited time to make decisions. Consequently, actors opt for a selection of satisfactory alternatives instead of optimal ones and often turn to their immediate surroundings and readily available data and knowledge to find suitable choices (Simon 1957). The second mechanism, the logic of appropriateness, views human action as driven by internalized perceptions of what is perceived as appropriate (March and Olsen 1989). Lastly, actors may find that rule and role compliance is in accordance with their own self-interest. Organizations are thus seen as incentive systems that administer rewards and punishments (e.g. Ostrom and Ostrom 2015). In sum, these mechanisms may explain why structural characteristics *within* central administrations bias how the EU 'hits' domestic government institutions. Essential to this paper is examining how different structural characteristics of core-executive institutions matter in this respect. Three such structural variables are outlined in the following: horizontal specialization, vertical specialization and organizational affiliations.

Horizontal specialization

Horizontal specialization refers to how tasks or portfolios are divided horizontally *within and between* organizations. Those policy areas that are encompassed by the same organizational unit are supposed to be more coordinated than those that belong to different units. Luther Gulick (1937) contemplated four fundamental principles of horizontal specialization, namely specialization according to (i) territory, (ii) sector/purpose, (iii) function/process and (iv) clientele. He also emphasized the mutual relationship between specialization and coordination; dossiers that are encompassed by the same organizational unit are more likely to be coordinated than those belonging to different units. Accordingly, empirical studies show

that while an overwhelming majority of officials finds coordination to work effectively within their own unit, this holds only for a minority between departments (Kassim et al. 2013: 188-89). Therefore, the departmental affiliation of various policy units could make a significant difference. In the same vein, cleavages of conflict were assumed to reflect these principles of specialization. For example, specialization according to purpose is likely to mobilize sectoral lines of cooperation and conflict and thereby foster policy consistency within its respected field. We thus expect that officials that are embedded in organizations that are primarily specialized by purpose would coordinate more strongly *within* their respective policy domains than across these domains. In the case of government ministries, we thus expected that officials in sector ministries report stronger *intra*-ministerial than inter-ministerial coordination.

Yet, domestic public administration in the EU consists within a larger politico-administrative order. Consequently, organizational compatibilities within such an order might matter. Though transnational cooperation on issue-specific tasks and practices has existed for decades, the EU executive centre has emerged as a more challenging actor within regulatory networks (e.g. Majone 1996; Dehousse 1997; Levi-Faur 2011; Egeberg and Trondal 2015; Joosen and Brandsma 2017). Essentially, the executive centre at EU-level (concentrated at the Commission and EU agencies (e.g. Bauer and Trondal 2015; Egeberg 2006)) is mainly specialized according to purpose (sector) and function (process), largely compatible to national central administrations. Arguably, organizational compatibility across levels of governance is likely to facilitate sectoral allegiances and cooperation *across* levels of governance. Studies have shown that organizations that are specialized according to similar organizational principles tend to align more easily across levels of governance than those

institutions that are organized according to different principles (e.g. Martens 2010). Hence, the effects of organizational principles at one level of governance may be conditioned by the degree of organizational compatibility across levels (e.g. Cowles et. al 2001; Knill and Lehmkuhl 1999; March and Olsen 1995). Commission DGs and their system of expert committees are largely organized similarly as domestic sector ministries (purpose). By contrast domestic ministries of foreign affairs (MFA) are mainly specialized according to territory and thus organizationally compatible to the core structure of the Council of Ministers (Council). This suggests that domestic sector ministries are likely to align with the Commission DGs more than with the Council structure. Moreover, the continuous expansion of scope and content in the EEA agreement (from 1994 onwards) gives reasons to believe this pattern, if anything, has expanded over time. The following propositions are derived:

P1: Due to organizational compatibility, officials in sector ministries are more likely to interact with the Commission than with other EU institutions.

P2: The coordination of EU-related work is relatively lower between than within ministries.

Vertical specialization

Vertical specialization denotes division of responsibility and labour *within and between* levels of authority. This paper focuses empirically on the effect of hierarchy – or vertical specialization - *within* ministerial departments. Hierarchy between organizations provides certain decision inputs, e.g. a more general view in hierarchical superior units compared to lower ranked units, that cannot easily be achieved through purely horizontal arrangements. Vertical specialization between organizations means to modify hierarchy by installing an organizational boundary between a superior and a subordinate unit. Agencification, the process whereby regulatory tasks are hived off from ministerial departments into semi-

independent regulatory bodies, is a topical example. The New Public Management (NPM) wave that swept across OECD states during the 1980s and -90s made pleas for greater autonomy, fragmentation and proliferation of public administration institutions and systems. As one result, vertical specialization in the form of structural devolution became a major reform trend across Europe (in public administration terms: agencification; in organizational terms: inter-organizational vertical specialization). This reform thread led to semi-autonomous agencies enjoying ever more degrees of autonomy at both the national and the EU levels (e.g. Lægreid et al. 2010; Bezes et al. 2013). Hierarchy within ministries – or intra-organizational vertical specialization - is measured in this paper by official's rank within their respective ministry (see below). Within organizations, it has been demonstrated that leaders identify with a larger part of the organization than those at lower levels. Leaders also interact more frequently across organizational units and are exposed to broader flows of information than their subordinates. Higher ranked staff in both ministries and subordinated agencies is shown to be more attentive to political signals than lower ranked personnel (e.g. Egeberg and Sætren 1999; Christensen and Lægreid 2009). This implies that leaders are better equipped to take into consideration a wider set of goals, alternatives and consequences when making choices (Egeberg and Trondal 2018). Studies show that top-ranked staff tend to identify more frequently with organizations as wholes than staff located at lower echelons (Egeberg and Sætren 1999). Additionally, these officials are exposed to a broader range of information than lower level staff and thus may be more attentive to broader organizational perspectives than lower ranked personnel (Egeberg and Trondal 2018). It follows that government officials with lower ranks are more loosely coupled to the political leadership and have a more local perspective on task execution compared to higher ranked staff. This has one important implication: a relative degree of insulation from political leadership makes lower-ranked

officials more eligible receivers of impulses from EU-level institutions and processes. The following proposition is derived:

P3: Ministerial officials at higher ranks are *less* likely to be strongly involved in EU-related work and thereby *less* likely to interact with EU institutions compared to ministerial officials at lower ranks.

Organizational affiliation

Organizational affiliations consist of primary and secondary structures. A 'primary structure' is defined as the structure to which participants are expected to devote most of their loyalty, time and energy. A typical example would be a bureaucratic unit like a ministry. A 'secondary structure' is defined as the structure to which participants are expected to be part-timers. It follows that secondary structures is unlikely to shape actors' decision behaviour to the same extent as primary structures. Secondary structures include collegial bodies, committees and networks (Egeberg 2012). The EU multilevel administrative system is comprised of a set of inter-connected organizations at different levels of authority. Ministerial officials that operate within this frame are likely to be exposed to several behavioural premises from their primary and secondary affiliations. Empirical studies show that interdepartmental committees, regional councils, and public-private governing arrangements enhance interaction and coordination, and erect trust-relationships among the participants, however, the effects are moderate (Stigen 1991; Lægreid et al. 2016; Jacobsen 2015; Ansell and Gash 2008).

Moreover, a *logic of primacy* suggests that the primary affiliation is likely to affect behaviour more extensively than the secondary (March 1994). The following propositions are derived:

P4: When taking part in both primary and secondary structures, ministerial officials are likely to attend to and emphasize signals from both structures, albeit most strongly from primary structures.

P5: When in conflict, ministerial officials are more likely to emphasize signals from primary than from secondary affiliations.

DATA AND METHODS

The study benefits from a unique data set on the role of central administration in the public governance process. Over the last thirty years, a group of Norwegian scholars, including the authors, has each decade conducted surveys in the Norwegian central administration (1976, 1986, 1996, 2006 and 2016). The data sets include questions about the civil servants' background, careers, contact patterns, priorities, perceptions about power, reforms and internationalization. From 1996 the surveys included questions about the central administration's relations with the EU. This paper contains data from 1996, 2006 and 2016, giving an overall N of 3562. At all periods, the survey was sent to all officials at the level equivalent to the 'A-level' with a minimum of one year in office. Appointment at this level usually requires a university degree. Hence, the sample of this survey is the total universe of 'A-level' civil servants in Norwegian ministries (see the Appendix for an overview of ministries included). These surveys represent *the* 'most thorough screening' of the Norwegian central administration, and thus the most comprehensive data-base on the effects of European integration on national government administrations (see also Geuijen et al. 2008). To allow for comparisons, the questionnaires are kept nearly identical over time with just few necessary adjustments. Whereas the survey from 1996 was distributed to the respondents by postal mail, the 2006 and 2016 surveys were conducted as online surveys by the Norwegian

Centre for Research Data (NSD). All data sets have been stored and made publicly available by NSD. The overall response rate is solid and the total response rates have decreased only marginally during this 20 years' period. The drop in response rates from 1996 to 2016 may only partly stem from a change of survey technology from postal survey to online survey. The main explanation for decreasing response rates is a general fatigue among respondents towards surveys.

Two caveats should be mentioned: Firstly, studies that rely on respondents own behavioural perceptions do not observe directly public governance processes or behaviour. Respondents may exaggerate or downplay own role or the role of others. Yet, the use of three large-N surveys does, however, substantially increase the likelihood of robust conclusions. Moreover, the use of multiple proxies increases the validity of measurement. Secondly, the use of cross-sectional data may be biased by inter-individual variability in perceptions or that it fails to take into account concurring factors that may influence outcome. Ideally, in order to draw robust conclusions on causal effects, research on developments over time should benefit from longitudinal panel data. Nonetheless, this does not mean that cross-sectional data cannot provide useful and interesting insights as regards continuity and change.

--Table 1 about here--

ADMINISTRATIVE INTEGRATION WITHOUT MEMBERSHIP

This section demonstrates how the EU contributes to a self-reinforcing administrative bias in extreme cases of high integration without membership. Over time, this administrative bias shows a self-reinforcing effect: Norwegian officials dealing with the EU are increasingly far

from the political level and are strongly “Europeanized” by being tightly interwoven and influenced by EU institutions.

This partly reflect the *dynamic* character of the EEA agreement which requires Norwegian law to continuously adjust to new EU legislation. The agreement is based on the premise of *dynamic homogeneity* and currently more than 11,000 EU acts have been incorporated into the agreement (Fossum and Graver 2018: 47). The agreement covers the Single Market *acquis* and a number of additional policy fields – making it the most extensive form of agreement between the EU and a non-member as regards regulatory scope and the legal obligations resulting from the contractual relations (Fossum and Graver 2018; Lavenex 2011). At the same time, the agreement blocks Norwegian governments *qua* state from political representation in the Council. Nonetheless, whereas Norway’s associated status does not grant Norway formal access to EU’s decision-making institutions, it provides for *administrative* participation at various stages of EU’s legislative process. Norwegian ministries and agencies are represented in Commission expert committees and comitology committees, sit on most EU agencies boards and committees, and are entitled to second national experts to the Commission. Norwegian civil servants are thus granted privileged access to EU-related work and are largely responsible for handling everyday relationships with EU institutions - in up-stream processes (the agenda setting processes) and particularly in down-stream processes (the implementation and practising of EU law). Thus, whereas Norway is politically side-lined in EU decision-making processes, the Norwegian national central administration is granted favoured access to the EU bureaucratic apparatus, quite similar to that of EU member states (see below).

The launch of the EEA agreement in 1994 marked the beginning of a new area of dense administrative integration between EU institutions and the Norwegian central administration. At the time the EEA agreement was viewed as a *prelude* and an *interim-period* towards full EU membership as the prospects of such were both open as well as vigorously pursued by the then-government. However, the following rejection of EU membership in a heated national referendum reintroduced the EEA agreement as Norway's foundational connection to the EU in the years to come. Additionally, close historical and cultural ties as well as common interests in a host of policy areas led to subsequent agreements in areas outside the framework of the EEA agreement (Meld.St 5 (2012-13)). At present there are approximately 130 agreements between the Norway and the EU, with the EEA and Schengen being the most encompassing. In effect, while the *form* of affiliation has remained stable during the past 20 years, the *scope* of the affiliation has undergone significant expansion - partly in response to policy progressions in the EU, partly in response to the dynamic character of the EEA agreement, and partly because of Norway signing ever-more sectoral agreements with the EU. In sum, this has increased the subsequent likelihood of Norwegian government institutions and governance processes being affected by EU-level institutions and processes.

Quite similar to the Commission and EU agencies, the Norwegian central administration is organized according to the principles of purpose and function. From an organizational perspective, this has two substantial implications: firstly, it is likely to encourage sectoral allegiances and integration across levels of governance, and secondly to underpin national inter-ministerial fragmentation. Moreover, as far as policy harmonization is concerned, the *form* of affiliation does in fact warrant EEA countries the same level of integration as full member states. Since Norway is not subjected to political representation in the Council, it has

been argued that Norwegian sector ministries are likely to be even more strongly 'hit' by the Commission than member states' ministries (Egeberg and Trondal 1999; Trondal 2002). This assumption, however, is beyond the scope of this paper.

Like most core executives, the Norwegian central administration is organized into core-executive ministries and subordinated agencies. The system is characterized by a ministerial primacy where subordinated agencies are subject to political control and administrative accountability from the responsible minister and not primarily from a government collegium. The total number of employees within the central administration¹ has increased from around 13000 in 1994 to 21000 in 2015 of which 4600 are employed in the ministries and the remaining 16400 are employed in subordinate agencies (DiFi 2015). Whilst Norwegian ministries are secretariats for the political leadership with planning and coordinating functions (Christensen and Lægreid 2009), agencies are mainly responsible for advising ministries and being technical helpers, but are also essential ingredients in the political processes of preparing policies and implementing and administering policies.

Our survey asked ministerial officials how, in general, affected they are by the EU/EEA/Schengen in their daily work. Table 2 displays an overall stability in this regard over time, yet with a small increase during the last decade. In the remaining, only those officials who report being affected (to a fairly small degree, or more) by the EU/EEA/Schengen are included in the analysis.

¹ Includes all employees in ministries and subordinate units. For full list, see <https://www.difi.no/rapporter-og-statistikk/nokkeltall-og-statistikk/ansatte-i-staten#4817>

--Table 2 about here--

Ministry officials were asked about their contacts and participation in EU-level institutions. Table 3 reveals two main patterns: First, stability over time in multi-level participation and secondly how organizational affiliation matter in this regards (P1). First, whilst we observe increased contact between sector ministries, the Commission, expert committees and comitology committees from 1996 to 2006, these patterns remain stable during the last decade. This suggests that Norwegian ministries have experienced a threshold in its access to the EU administration. Correspondingly, the gap between the sector ministries and the MFA shows a notable increase between 1996 and 2006, and then remains stable from 2006 to 2016. This gap reflects organizational compatibility between sector ministries and the EU administration (P2). One additional explanation is that the EEA agreement makes the Commission the *main* interaction partner for sector ministries, thus biasing the access structure for Norwegian ministries vis-à-vis EU institutions. Also, worth noting is that whereas contacts towards the Commission have remained stable during the past decade, sector ministries' contacts towards EU agencies have decreased. This reflects the fact that national agencies have acquired a larger position as access-points for EU agencies (see Egeberg and Trondal 2015). Secondly, the data shows that ministry affiliation matters (P1) since Table 3 reveals a substantial difference between staff affiliated to sector ministries and staff affiliated to the MFA. Except for the European Parliament (2016 data only), sector ministries are consistently more involved with EU-institutions, even the Council. Moreover, reflecting compatible principles of organization, officials from sector ministries tend to concentrate attention towards the Commission, EU agencies and Commission expert committees, whereas

officials from the MFA give more attention to the Council. As mentioned above, this patterns also reflect the access structure embedded in the EEA agreement.

--Table 3 about here--

Next, respondents were asked about their coordination behaviour. Table 4 reveals an overall low level of coordination of EU-related work and an increasing reliance on intra-ministerial coordination over time. In support of P2, coordination is slightly higher *within* ministries than *between* ministries at all three points in time. Moreover, the gap between *intra*-ministerial and low-level *inter*-ministerial coordination appears to increase over time. Since the Foreign Office chairs the high-level inter-ministerial coordination committee, these data also testify the declining role of the FO over time. This in sum shows rising reliance on sector ministries and sector specialists and less on the generalists from the FO. Also worth noting is the general decrease in this type of coordination behaviour, particularly from 2006 to 2016. One important caveat should be noted though: Although a common assumption is that the primary objective of coordination committees is to coordinate, studies have shown low level of substantial coordination in inter-ministerial coordination committees (Trondal 2001). These committees are characterized by mutual inter-ministerial information-sharing but low level of coordination of tasks, policies and positions. Moreover, bearing in mind that EU-affectedness has remained stable over time (Table 2), one may contemplate that the decrease in coordination behaviour reflect EU-related work becoming more routinized, which in turn diminishes needs for formal dialogue through committees.

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As proposed (P3), Table 5 confirms that officials' rank is negatively associated with interaction with EU-level institutions. The finding is robust since the pattern unfolds consistently over time both with regards to contacts with various EU-institutions and participation in EU committees – including those under EU agencies. In other words, coordination is consistently exercised by low-level bureaucrats, thus reinforcing a politico-administrative gap.

Interestingly, Table 5 shows a 10 to 15 percent increase of interaction with EU-level institutions for low-level officials from 2006 to 2016 and a corresponding decrease in interaction for medium and high-level officials on all variables. This provides further support to the assumption of a self-reinforcing politico-administrative gap. Moreover, the sheer increase in interaction is also fostered by an increasing number of agreements between Norway and the EU, affecting ever more policy areas and government officials.

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A similar analysis (Table 6) on the effect of rank on coordination behaviour reveals a similar pattern: A negative correlation between rank and participation in coordination committees and a parallel negative correlation between rank and those reporting that their ministry's work has been subject to coordination from the Prime Minister's Office, the MFA, other ministries, the parliament, and/or interest groups. Officials at low ranks score consistently higher on these variables than do officials at medium and high ranks. This finding is also consistent over time, supporting the observation of a self-reinforcing politico-administrative gap. This behaviour, we argue, measures degrees of involvement in EU-work, not merely coordination as such. It follows that lower level officials will enjoy a more comprehensive view

of their ministry's EU-related work compared to higher level officials. Supporting these findings in greater detail, Table 6 displays increased participation in high-level coordination committees from around 55 percent in 1996/2006 to almost 70 percent in 2016. Moreover, from 2006 to 2016 our data shows an average of 11 percent increase in participation of lower level officials in the three types of coordination committees. A similar pattern can be found when examining modification/change due to coordination with other actors: from 2006 to 2016 we see an average of 16 percent increase in lower level officials reporting that their ministry's work had been modified or changed due to the actors listed above.

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Table 7 examines whether various types of coordination behaviour are mutually supplementary or contradictory and thus deemed important *by the same officials*. To merely probe patterns, Table 7 applies two sets of variables from the 2016 survey: The degree to which officials participate in intra- and inter-ministerial coordination committees (variables 1 to 3) and the extent to which they report that own ministry's position in EU related work are modified due to coordination with various other institutions (variables 4 to 8). The findings suggest that different coordination behaviour tend to be mutually supplementary, but also that that substantive coordination is weakly associated with participation in coordination committees. From the latter we infer that coordination committees, albeit meeting actively, are not instrumental coordinating devices in EU related work.

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Next, Table 8 illustrates the perceived importance of both primary and secondary structures (P4). Two main findings are displayed: As proposed, primary structures are deemed significantly more important than secondary structures. Moreover, this pattern is robust over time. The most noteworthy change is the increased importance ascribed to national agencies from 1996 to 2016. This finding reflects the ‘agencification’ wave in Norway, as in most OECD countries, during the same time period (e.g. Verhoest et al. 2010) and the parallel ‘agencification’ of the EU administration (Egeberg and Trondal 2017). Whilst Table 3 revealed decreasing contacts between sector ministries and EU agencies, Table 7 shows a corresponding decrease in perceived importance of EU agencies. This finding reflects the increased importance of national agencies, and not ministerial departments, as national access-points for EU agencies. Studies have demonstrated a tendency for EU agencies to bypass the ministerial level and interact directly with the national agencies contributing to a ‘direct’ multilevel administrative structure (e.g. Egeberg and Trondal 2009a). This may have off-loaded some EU-workload from the ministerial level.

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Finally, to probe P5, respondents were asked to reflect on conflict behaviour: They were questioned how they prioritize when conflicts appear between the wishes of their political leadership and the requirements of EU law in their EU-related work. Table 9 demonstrates that, when in conflict, most ministerial officials seek to compromise between the wishes of their political leadership and the requirements of EU law. This suggests that ministry officials, not only agency officials as studied by Egeberg and Trondal (2009b), are ‘double hatted’ in their EU-related work. Moreover, Table 9 illuminates the intrusiveness of the ‘double-hatted’

national central administrations since ministry officials seem to serve ‘two masters’. This observation is an even stronger probe of the idea a national ‘double hatted’ central administration, given that ministry officials are less likely to ‘go Brussels’ than agency officials simply by being more strongly bound by national political steering. Among the few respondents reporting being ‘single hatted’, their primary structures (the wishes of own political leadership) is deemed slightly more important than secondary structures (the requirement of EU law).

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CONCLUSIONS

The paper has made two main contributions: Theoretically, it examines the role of organizational factors in public governance in general and in administrative integration in particular. The data suggests that administrative integration is promoted and nudged by ‘favourable’ organizational conditions at the *domestic* level of government. Moreover, the paper highlights how strong integration without political membership in the EU fuels the administrative state. Following the public administration turn in EU studies, one might also envisage that while a member-state withdraws from political membership in the EU, domestic agencies might find themselves somehow integrated with EU administrative networks. Moreover, the observed mechanism may play out more generally in other (member) states; i.e. the observed general EU coordination techniques could also be expected to have similar effects in member states, especially the higher involvement of lower ranks than involvement of higher (more political) levels. The general theoretical idea is captured by the public

administration approach to European integration that sees the EU as consisting of interconnected sets of agencies, ministries and regulatory networks.

Empirically, this study demonstrates how the EU contributes to a self-reinforcing administrative bias in domestic core executives. To do so, the paper applies an extreme case of high integration without formal EU membership. Over time, this administrative bias gets a self-reinforcing effect: Norwegian officials dealing with the EU are increasingly far from the political level (low-ranked staff) and are (surprisingly) strongly “Europeanized” by being tightly interwoven and influenced by EU institutions. In greater detail, the data consistently displays a relatively high degree of interaction between sector ministries and EU-level executive institutions (P1). It also affirms a higher level of coordination *within* than *between* ministries (P2) and that officials of lower ranks are more extensively involved at the EU-level than officials of higher ranks (P4). Finally, the importance of primary organizational structures is affirmed (P4) and the data demonstrates a strong tendency of ‘double-hattedness’ amongst ministerial officials (P5). Future longitudinal studies are needed that document continuity and change in patterns of administrative integration.

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APPENDIX: LIST OF MINISTRIES IN SURVEY (2016)

Office of the Prime Minister

Ministry of Agriculture and Food

Ministry of Children and Equality

Ministry of Climate and Environment

Ministry of Culture

Ministry of Defense

Ministry of Education and Research

Ministry of Finance

Ministry of Foreign Affairs

Ministry of Health and Care Services

Ministry of Justice and Public Security

Ministry of Labour and Social Affairs

Ministry of Local Government and Modernization

Ministry of Petroleum and Energy

Ministry of Trade, Industry and Fisheries

Ministry of Transport and Communications

REFERENCES

Ansell, C., & Gash, A. (2008) 'Collaborative Governance in Theory and Practice', *Journal of Public Administration Research and Theory* 18(4): 543–71.

Bauer, M., & Trondal, J. (eds.) (2015) *The Palgrave handbook of the European administrative system*. Cheltenham: Palgrave Macmillan.

Bezes, P., Fimreite, A. L., Lidec, P. L., & Lægreid, P. (2013) 'Understanding organizational reforms in the modern state: Specialization and integration in Norway and France', *Governance* 26(1): 147-175.

Brunsson, N. (1989) *The Organization of Hypocrisy*. New York: John Wiley.

Bækgaard, M. (2010) 'The impact of formal organizational structure on politico-administrative interaction: Evidence from a natural experiment', *Public Administration* 89(3): 1063-1080.

Cowles, M. G., Caporaso, J. A., & Risse-Kappen, T. (2001) *Transforming Europe: Europeanization and domestic change*. Ithaca: Cornell University Press.

Christensen, T., & Lægreid, P. (2007) 'The whole-of-government approach to public sector reform', *Public Administration Review* 67(6): 1059-1066.

Christensen, T., & Lægreid, P. (2009) 'Living in the Past? Change and Continuity in the Norwegian Central Civil Service', *Public administration review* 69(5): 951-961.

Dehousse, R. (1997) 'Regulation by networks in the European Community: the role of European agencies', *Journal of European Public Policy* 4(2): 246-261.

DIFI (2015) *Ansatte i staten*, retrieved 02.2017 from <https://www.difi.no/rapporter-og-statistikk/nokkeltall-og-statistikk/ansatte-i-staten>

Egeberg, M. (ed.) (2006) *Multilevel Union Administration*. Houndmills: Palgrave Macmillan.

Egeberg, M. (2012) 'How bureaucratic structure matters: An organizational perspective', in B.G. Peters and J. Pierre (eds.) *The SAGE Handbook of Public Administration*. London: SAGE.

Egeberg, M., Gornitzka, Å. & Trondal, J. (2016) 'Organization Theory', in C. Ansell and J. Torfing (eds.) *Handbook on Theories of Governance*. Cheltenham: Edward Elgar.

Egeberg, M., & Sætren, H. (1999) 'Identities in Complex Organizations: A study of ministerial bureaucrats', in M. Egeberg and P. Lægreid (eds). *Organizing Political Institutions*. Oslo: Scandinavian University Press.

Egeberg, M., & Trondal, J. (1999) 'Differentiated integration in Europe: The case of EEA country, Norway', *Journal of Common Market Studies* 37(1): 133-142.

Egeberg, M., & Trondal, J. (2009a) 'National agencies in the European administrative space: government driven, commission driven or networked?', *Public Administration* 87(4): 779-790.

Egeberg, M., & Trondal, J. (2009b) 'Political leadership and bureaucratic autonomy: Effects of agencification', *Governance* 22(4): 673-688.

Egeberg, M., & Trondal, J. (2015) 'Why strong coordination at one level of government is incompatible with strong coordination across levels (and how to live with it): The case of the European Union', *Public Administration* 94(3): 579-592,

Egeberg, M. & Trondal, J. (2017) 'Researching European Union Agencies. What have we learned (and where to go from here?)', *Journal of Common Market Studies* 55(4): 675-690.

Egeberg, M. & Trondal, J. (2018) *An Organizational Approach to Public Governance*. Oxford: Oxford University Press.

Fossum, J.E. and H.P. Graver 2018) *Squaring the Circle on Brexit*. Bristol: Bristol University Press.

Genschel, P. & Jachtenfuchs, M. (eds.) (2014) *Beyond the Regulatory Polity*. Oxford: Oxford University Press.

Geuijen, K., Hart, P. 't, Princen, S. & Yesilkagit, K. (2008) *The New Eurocrats: National Civil Servants in EU Policy-Making*. Amsterdam: Amsterdam University Press.

Gulick, L. (1937) 'Notes on the Theory of Organization', in L. Gulick and L. Urwick (eds.) *Papers on the Science of Administration*. New York: Institute of Public Administration.

Hammond, T. (1990) 'In defence of Luther Gulick's "Notes on the Theory of Organization"', *Public Administration* 68(2): 143-173.

Jacobsen, D. I. (2015) 'Regional Governance Networks: Filling in or Hollowing Out?', *Scandinavian Political Studies* 38(2): 115–36.

Joosen, R. & Brandsma, G. (2017) 'Transnational executive bodies: EU policy implementation between the EU and memberstate level', *Public Administration* 95: 423–436.

Kassim, H., Peterson, J., Bauer, M. W., Connolly, S., Dehousse, R., Hooghe, L. & Thompson, A. (2013) *The European Commission of the Twenty-First Century*. Oxford: Oxford University Press.

Knill, C. (2001) *The Europeanisation of National Administration*. Cambridge: Cambridge University Press.

- Knill, C. & Bauer, M. W. (2016) 'Policy-making by International Public Administrations: Concepts, Causes and Consequences', *Journal of European Public Policy* 23(7): 949-959.
- Knill, C., & Lehmkuhl, D. (1999) 'How Europe Matters. Different Mechanisms of Europeanization', *European Integration online Papers (EIoP)* 3(7), Available at SSRN: <https://ssrn.com/abstract=302746> or <http://dx.doi.org/10.2139/ssrn.302746>
- Lavenex, S. (2011) 'Concentric circles of flexible "EUropean" integration: A typology of EU external governance relations', *Comparative European Politics* 9(4/5): 372-393.
- Levi-Faur, D. (2011) 'Regulatory networks and regulatory agencification: towards a Single European Regulatory Space', *Journal of European Public Policy* 18(6): 810-829.
- Lægreid, P., Randma-Liiv, T., Rykkja, L. H., & Sarapuu K. (2016) 'Coordination Challenges and Administrative Reforms', in G. Hammerschmid, S. Van de Walle, R. Andrews, and P. Bezes (eds.) *Public Administration Reforms in Europe: The View from the Top*. Cheltenham: Edward Elgar.
- Lægreid, P., Rolland, V. W., Roness, P. G., & Ågotnes, J. E. (2010) 'The structural anatomy of the Norwegian state: Increased specialization or a pendulum shift?', in P. Lægreid and K. Verhoest (eds.) *Governance of public sector organizations*. Houndmills: Palgrave Macmillan.
- Majone, G. (1996) *Regulating Europe*. London: Routledge.
- Majone, G. (2005) *Dilemmas of European Integration*. Oxford: Oxford University Press.
- March, J.G. (1994) *A Primer on Decision-Making*. New York: The Free Press.
- March, J. G., & Olsen, J. P. (1976) *Ambiguity and Choice in Organizations*. Bergen: Universitetsforlaget.

March, J.G. & Olsen, J.P. (1984) 'The New Institutionalism: Organizational Factors in Political Life', *American Political Science Review* 78: 734-749.

March, J. G., & Olsen, J. P. (1989) *Rediscovering Institutions: The Organizational Basis of Politics*, New York: Free Press.

March, J.G. & Olsen, J.P. (1995) *Democratic Governance*. New York: The Free Press.

Martens, M. (2010) *Organized Administrative Integration*. ARENA Report No. 2.

Meier, K. J. & Capers, K. J. (2012) 'Representative Bureaucracy: Four Questions', in B. G. Peters and J. Pierre (eds.) *The SAGE Handbook of Public Administration*. London: SAGE.

Meld. St. 5 (2012–13) *The EEA Agreement and Norway's other agreements with the EU*.

Report to the Storting (White Paper), Oslo: Ministry of Foreign Affairs.

https://www.regjeringen.no/globalassets/upload/ud/vedlegg/europa/nou/meldst5_ud_eng.pdf

Meyer, J.W. & Rowan, B. (1977) 'Institutionalized Organizations: Formal structure as myth and ceremony', *American Journal of Sociology* 83(2): 340-363.

Niskanen, W. (1971) *Bureaucracy and Representative Government*. New York: Aldine.

Olsen, J.P. (2009) 'Change and Continuity: an Institutional Approach to Institutions of Democratic Government', *European Political Science Review* 1(1): 3-32.

Olsen, J.P. (2010) 'The Bergen approach to public administration and political organization', ARENA, University of Oslo.

Ostrom, E. & Ostrom, V. (eds.) (2015) *Choice, Rules and Collective Action*. Colchester: ECPR Press.

Rittberger, B. & Blauberger, M. (2018) 'Introducing the debate section: "The EU in crisis: EU studies in crisis?"', *Journal of European Public Policy* 25(3): 436-439.

Scott, W. R. & Davis, G. F. (2016) *Organizations and Organizing: Rational, Natural and Open System Perspectives*. London: Routledge.

Simon, S.A. (1957) *Administrative Behavior*. New York: The Free Press.

Stigen, I. (1991) 'Avbyråkratisering og Modifisert Forhandling? Om Bruk av Prosjektorganisasjon i Norsk Sentraladministrasjon', *Norsk Statsvitenskapelig Tidsskrift* 7(3): 173-91.

Thaler, R. H. & C. R. Sunstein (2009) *Nudge: Improving Decisions on Health, Wealth and Happiness*. London: Penguin Books.

Trondal, J. (2001) *Administrative integration across levels of governance*. Doctoral dissertation, Department of Political Science, University of Oslo.

Trondal, J. (2002) 'Beyond the EU membership-non-membership dichotomy? Supranational identities among national EU decision-makers', *Journal of European Public Policy* 9(3): 468-487.

Trondal, J. (2006) 'Governing at the frontier of the European Commission: The case of seconded national officials', *West European Politics* 29(1): 147-160.

Trondal, J. (2007) 'The public administration turn in integration research', *Journal of European Public Policy* 14(6): 960-972.

Trondal, J. (2010) *An Emergent European Executive Order*. Oxford: Oxford University Press.

Trondal, J., & Bauer, M. W. (2017) 'Conceptualizing the European multilevel administrative order: capturing variation in the European administrative system', *European Political Science Review* 9(1): 73-94.

Verhoest, K., Roness, P. G., Verschuere, B., Rubecksen, K., & MacCarthaigh, M. (2010) *Autonomy and Control of State Agencies*. Houndmills: Palgrave Macmillan.

Waldo, D. (1947) *The Administrative State. A Study of the Political Theory of American Public Administration*. London: Routledge.

TABLES

Table 1 Summary of propositions

Horizontal specialization	<i>P1</i> : Due to organizational compatibility, officials in sector ministries are more likely to interact with the Commission than with other EU institutions.
	<i>P2</i> : Due to organizational compatibility, officials in sector ministries are more likely to interact with the Commission than with other EU institutions.
Vertical specialization	<i>P3</i> : Ministerial officials at higher ranks are <i>less</i> likely to be strongly involved in EU-related work and thereby less likely to interact with EU institutions compared to ministerial officials at lower ranks.
Organizational affiliation	<i>P4</i> : When taking part in both primary and secondary structures, ministerial officials are likely to attend to and emphasize signals from both structures, albeit most strongly from primary structures.
	<i>P5</i> : When in conflict, ministerial officials are more likely to emphasize signals from primary than from secondary affiliations.

Table 2 Sample size and response rates in the ministry surveys, by year

	1996	2006	2016
N	1497	1874	2322
Response rates	72%	67%	60%

Table 3 Percentage of officials who reporting being *affected* by the EU/EEA/Schengen, by year

	1996	2006	2016
To a very large extent	11	13	14
To a fairly large extent	12	12	12
To some extent	23	18	23
To a fairly small extent	27	21	31
Not affected	27	37	20
N	100 (1463)	100 (1704)	100 (1773)

Table 4 Percentage of officials who report *contact with and/or *participation in*** EU-level institutions, by year and ministerial affiliation (sector ministries (SM)/Ministry of Foreign Affairs (MFA)) (percentages)**

	1996		2006		2016		N
	SM	MFA	SM	MFA	SM	MFA	
Contact with the Commission	68	32	83	17	83	17	100 (115)
Contact with the Council	-	-	-	-	57	43	100 (21)
Contact with the European Parliament	-	-	-	-	22	78	100 (9)
Contact with EU agencies	-	-	90	10	76	24	100 (39)
Participation in expert committee(s)	82	18	95	5	89	11	100 (94)
Participation in comitology committee(s)	86	14	100	0	100	0	100 (21)
Participation in the Council	-	-	-	-	60	40	100 (10)
Participation in committees, boards etc. in EU agencies	-	-	-	-	94	6	100 (18)

* The 'contact' variables combine values 1 and 2 on the following four-point scale: (1) App. every week, (2) app. every month, (3) a few times, (4) never.

** The 'participation' variables apply value 1 on the following three-point scale: (1) several times, (2) once, (3) never.

Table 5 Percentage of officials who have *met in ministerial coordination committees*, by year*

	1996	2006	2016
Intra-ministerial coordination committees**	18	18	13
Low-level inter-ministerial coordination committees***	17	15	9
High-level inter-ministerial coordination committees****	5	7	5
N	100 (1038)	100 (1056)	100 (1402)

* This table applies value 1 on a three-point scale: (1) multiple times, (2) once, (3) never.

** These committees are established to pursue intra-ministerial coordination of EU-related work.

*** These committees are headed by the responsible sector ministry to coordinate across affected sector ministries.

**** This committee is headed by the Ministry of Foreign Affairs to coordinate those dossiers that the low-level inter-ministerial coordination committees do not solve.

Table 6 Percentage of officials who report *contact with or *participation in*** the following EU-level institutions, by year and rank (lower level officials (L)***/medium and higher level officials (MH)**** (percentage)**

	1996		2006		2016		N
	L	MH	L	MH	L	MH	
Contact with the Commission	74	26	63	37	76	24	100 (115)
Contact with the Council	-	-	-	-	90	10	100 (8)
Contact with the European Parliament	-	-	-	-	100	0	100 (20)
Contact with EU agencies	-	-	73	27	83	17	100 (39)
Participation in expert committee(s)	78	22	70	30	85	15	100 (94)
Participation in comitology committee(s)	71	29	70	30	86	13	100 (21)
Participation in the Council	-	-	-	-	80	20	100 (10)
Participation in committees, boards etc. in EU agencies	-	-	-	-	72	28	100 (18)

* The 'contact' variables combine values 1 and 2 on the following four-point scale: (1) App. every week, (2) app. every month, (3) a few times, (4) never.

** The 'participation' variables apply value 1 on the following three-point scale: (1) several times, (2) once, (3) never.

*** Lower level officials include the following ranks: 1996: executive officer, higher executive officer, principal officer, assistant director. 2006: executive officer/adviser, principal officer/adviser, assistant director/adviser. 2016: adviser/senior adviser, specialist director/special adviser or equivalent.

**** Medium and higher level officials include the following ranks: 1996: director, director general, positions higher than director general. 2006: director/adviser, director general/adviser, positions higher than director general. 2016: director or equivalent, director general or equivalent

Table 7 Percentage of officials who report the following *coordination behaviour, by year and rank (lower level officials (L)**/medium and higher level officials (MH)*****

	1996		2006		2016		N
	L	MH	L	MH	L	MH	
Participation in intra-ministerial coordination committee	71	29	62	38	73	27	100 (181)
Participation low-level inter-ministerial coordination committee	83	17	75	25	84	16	100 (116)
Participation in high-level inter-ministerial coordination committee	56	44	55	45	69	31	100 (61)
Modified/changed own ministry's position in EU related work due to coordination with the Prime Ministers' Office	63	38	48	52	70	30	100 (35)
Modified/changed own ministry's position in EU related work due to coordination with the MFA	63	37	54	46	73	27	100 (60)
Modified/changed own ministry's position in EU related work due to coordination with other ministries	65	35	64	37	69	31	100 (82)
Modified/changed own ministry's position in EU related work due to coordination with the National Parliament	83	17	60	40	77	23	100 (20)
Modified/changed own ministry's position in EU related work due to coordination with the Interest groups	76	24	58	42	77	23	100 (27)

*This table applies value 1 on the following three-point scale: (1) multiple times, (2) once, (3) never.

** Lower level officials include the following ranks: 1996: executive officer, higher executive officer, principal officer, assistant director. 2006: executive officer/adviser, principal officer/adviser, assistant director/adviser. 2016: adviser/senior adviser, specialist director/special adviser or equivalent.

*** Medium and higher level officials include the following ranks: 1996: director, director general, positions higher than director general. 2006: director/adviser, director general/adviser, positions higher than director general. 2016: director or equivalent, director general or equivalent

Table 9 Percentage of officials who report that the following institutions are *important when making decisions on their own policy area, by year**

		1996	2006	2016
<i>Primary structures</i>	Own ministry	95	96	98
	Subordinated agencies	53	65	69
	Other ministries	64	64	72
	National Parliament	78	77	80
	National government	86	90	91
<i>Secondary structures</i>	Commission	23	29	22
	Council	-	-	14
	European Parliament	-	-	12
	EU agencies	-	11	9
N		100 (1043)	100 (1007)	100 (1340)

*This table combines values 1 and 2 on a five-point scale: (1) very important, (2) fairly important, (3) somewhat, (4) fairly unimportant, (5) very unimportant (6) Do not know/not relevant

Table 10 Percentage of officials who report the following priorities if conflicts occur between the wishes of their national political leadership and the requirements of EU law*

	<i>Ministry</i>	<i>Agency</i>
Primarily follow the wishes of own political leadership	11	15
Try to combine the wishes of own political leadership and EU law	84	68
Primarily follow the requirement of EU law	5	17
N	608 (100)	476 (100)

* The table includes those officials that incorporates and/or practices EU legislation within their own policy field. The category 'not relevant/not occupied with such tasks' are coded missing.