ABHANDLUNG

International Bureaucracies as Strategic Actors: How the Better Regulation Reform Strengthens the European Commission

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Abstract The 2015 Better Regulation Reform is recognized as one of the key changes of Juncker's European Commission, but its political implications remain understudied. Despite its appearance as a seemingly technical evaluation system, we present the reform as a political instrument that enhances the strategic actorness of the Commission, both internally and vis-à-vis the member states. Drawing on primary documents and 16 expert interviews with senior Commission officials, we demonstrate that the Better Regulation Reform enhances the Commission's ability to act as a unified actor (internal coherence) and contributes to its ability to justify its actions vis-à-vis the member states (external robustness). The article contributes to the literature on international public administration in general and the EU in particular, as it demonstrates how institutional policies may enhance bureaucratic influence. We reveal how an international public administration can conform to member states' demands for more accountability and transparency yet design the overall evaluation system in a way that contributes to its strategic actorness.

Keywords International public administration · International organization · Bureaucracy · Influence · Evaluation

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Internationale Verwaltungen als strategische Akteure: Wie die Reform für bessere Rechtssetzung die Europäische Kommission stärkt

Zusammenfassung Obwohl die Reform für bessere Rechtssetzung (Better Regulation Reform) aus dem Jahr 2015 als eine der wichtigsten Errungenschaften der Juncker-Kommission gesehen wird, sind ihre politischen Auswirkungen kaum untersucht. Für viele erscheint die Reform, in deren Zentrum ein neues Evaluationssystem von Rechtssetzungsakten steht, als hoch technokratisch. Im Kern der vorliegenden Analyse steht dagegen der politische Nutzen der Better Regulation Reform für die Kommission, sowohl intern als auch gegenüber den Mitgliedstaaten. Basierend auf Primärdokumenten und 16 Experteninterviews zeigen wir, wie die Better Regulation Reform die Kommission dazu befähigt, intern als einheitlicher Akteur aufzutreten (interne Kohärenz) und Gesetzesvorhaben gegenüber Mitgliedstaaten zu legitimieren (externe Belastbarkeit). Die Studie leistet damit einen Beitrag zum Forschungsstand, zu internationalen Verwaltungen im Allgemeinen und zur EU im Speziellen. Unsere Erkenntnisse legen dar, dass institutionelle Politiken wie Evaluationssysteme den Einfluss von Verwaltungen stärken können, indem sie einerseits Mitgliedstaaten Zugeständnisse für mehr Rechenschaft und Transparenz machen, andererseits aber so ausgestaltet werden, dass sie den strategischen Interessen der Verwaltung dienen.

Schlüsselwörter Internationale Verwaltungen · Internationale Organisation · Bürokratie · Beeinfussung · Evaluation

> *This Commission will be different: political, experienced, and results-oriented.*
> *We will be doing less, but we will be doing our work more effectively.*
> *We will be working as a team and not in silos. We will be political, and not technocratic.*
> *And we will deliver.*
>
> (Jean-Claude Juncker, President of the European Commission 2014b)

1 Introduction

Scholarship on agenda setting in the European Union usually depicts the European Commission (EC) as a knowledgeable expert, a neutral actor providing nonpartisan advice and following "a technocratic depoliticized route to agenda-setting" in the EU (Haverland et al. 2018, p. 329; Princen and Rhinard 2006). However, research on the EU has increasingly highlighted the political nature of the European Commission, describing the EC as a 'skillful policy entrepreneur' and a 'purposeful opportunist' (Wonka 2007; Kassim et al. 2016; Wendon 1998). Also, probably for the first time, the recent European Commission (2014–2019) itself has declared it to be a political, rather than technocratic, actor (see the epigraph).[1]

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[1] While the previous Barroso Commission is also described to be "politically astute" (Kassim et al. 2016, p. 661), its own positioning was more careful. By contrast, the Juncker Commission has clearly declared

If the Commission is indeed a political actor—i.e., has its own interests, which it tries to realize in competition with others—its growing reliance on new public management (NPM) tools seems puzzling. In 2015, the Juncker Commission adopted the Better Regulation Reform (BRR). The reform's overall aim was to reduce the regulatory burden and enhance evidence-based policy making in the EU. Yet on the micro level, the BRR essentially introduced a set of tools and rules to further institutionalize the Commission's evaluation system, encompassing both ex ante impact assessments and ex post evaluations as well as fitness checks conducted by the EC in the context of the EU policy cycle (Anglmayer 2016).[2] From the literature, we know that evaluation creates internal tensions between organizational units, the members of which feel they are being judged by their colleagues (Taylor and Balloch 2005, p. 124). One might also expect that the reform would lead to an internal overload and reinforce policy silos (Cini 2007). The increased focus on transparency and accountability might also expose the EC to greater control by member states, since every mistake can appear in evaluation reports. It is for these reasons that Wildavsky (1972) long ago declared the self-evaluating bureaucracy as a myth and that analysts until recently expected that systematic evaluation by the Commission "is not likely to materialize," as it "may uncover critical problems in the actual working of legislation" (Mastenbroek et al. 2016, p. 1330).

Then why did the Juncker Commission still enact the Better Regulation Reform? This article argues that despite its technical appearance as a management instrument geared toward enhancing organizational performance and accountability, the reform has contributed to the *strategic actorness* of the Commission as an international bureaucracy (Peterson 2017; see also Kassim et al. 2016). Drawing on recent studies on the influence of international public administrations (IPAs), we understand the strategic actorness of an international bureaucracy as a combination of internal coherence (ability to steer the organization) and external robustness (appearing as a unitary actor vis-à-vis outside actors). Internally, the BRR responds to collective agent dynamics within international organization (IO) administrations (Graham 2014; Hanrieder 2015) by enhancing the Commission's vertical and horizontal coordination. Externally, the BRR helps the Commission to better map member states' interests and, accordingly, propose initiatives that are more robust in terms of reliability and credibility. This refers to bureaucratic justification dynamics vis-à-vis member states (Hawkins et al. 2006b; Bauer et al. 2017).

In making this argument, this article asks how the BRR affects the strategic actorness of the EC. We proceed by first conceptualizing the strategic actorness of IO bureaucracies as we distinguish between key internal and external obstacles that they as organizational actors face. Second, we theorize on how evaluation may help an IPA to overcome these challenges by contributing to internal coherence and external robustness. In the empirical section, we draw on primary EC documents and 16 expert interviews with senior Commission officials to unpack the key tools of the BRR and see how they affect the Commission's strategic actorness along the

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to be a political rather than merely a technocratic actor (Juncker 2014a; see also Peterson 2017; Koronakis 2019; Tömmel 2018).

[2] For the full guidelines of the BRR see European Commission (2017b).

internal and external dimensions. Before we draw conclusions, a short discussion elaborates more on the implications of our findings.

The contribution this article makes is twofold. First, our findings reinforce research that highlights the Commission as an entrepreneurial self-interested actor that is able to use its technocratic procedures for political purposes (Rimkute and Haverland 2015; Wonka 2007), namely to strengthen itself both internally and externally. In this line, this article provides an in-depth empirical example of how the Commission, as an international bureaucracy, can conform to the member states' demands for more accountability and transparency, yet design the overall administrative reform and the related evaluation techniques in a way that enhances its strategic actorness. This, in turn, speaks to nascent research on the influence of IO bureaucracies more generally (Bauer et al. 2017; Biermann and Siebenhüner 2009; Eckhard and Ege 2016; Eckhard and Jankauskas 2019; Jörgens et al. 2016; Hooghe and Marks 2015; Eckhard et al. 2018; Knill et al. 2017, 2019; Trondal et al. 2010).

Second and related, the article taps into a long-standing debate on the politics of evaluation and instrumentation, which acknowledges that evaluations "do not take place in a vacuum" (Raimondo 2018, p. 26) but in an environment with stakeholders seeking to employ evaluations for their own preferences (Weiss 1993; Taylor and Balloch 2005; Bjornholt and Larsen 2014; Eckhard and Jankauskas 2019; Radaelli and Meuwese 2010; Lascoumes and Le Galès 2007). As a number of studies demonstrate, the most influential stakeholders are often the ones who control the institutional factors of the evaluation system (e.g., its budget, staff, and agenda setting) (Højlund 2014b; Azzam 2010; Stockmann et al. 2011). By unpacking the structural features and the resulting political implications of the BRR, we reveal the political nature of seemingly neutral functional tools, which are increasingly used in IOs.

2 Strategic Actorness of International Bureaucracies

In general, strategic actorness can be understood as an IPA's ability to act deliberately vis-à-vis other actors in the international system, notably member states (Barnett and Finnemore 2004; Carbone 2013; Bauer et al. 2017). While "actorness" underlines bureaucracy as an independent entity with its own interests, "strategic" underlines its orientation toward the fulfillment of these interests (Cox 1969). Based on the state of the art, we identify two relevant dimensions that enhance or preserve an IPA's strategic actorness, namely its (i) internal and (ii) external challenges. This corresponds to principal-agent theory, which has traditionally been used to grasp the complex relationship between member states as a collective principal and IO bureaucracies as a collective agent (Hawkins et al. 2006b; Bauer et al. 2017; Graham 2014; Patz and Goetz 2019).

First, IPAs are faced with *internal* challenges, which primarily arise from their structural fragmentation. Just as principals face collective action problems, the same applies to the agent side. IPAs are structurally fragmented, meaning that organizational units at different levels may develop diverging interests (Hanrieder 2015; Graham 2014). This, in turn, might become a key challenge for an IO's management in steering the organization from above, keeping the shifting organizational

parts together. This refers to what Bauer and Ege (2017, p. 23) call "administrative cohesion," which is required for a bureaucracy to "construct and maintain a common identity and to function as a unified entity." For instance, Graham (2014) demonstrates that the internal disconnect between the interests of the World Health Organization's regional offices and the headquarters led to a deficient bureaucratic performance.

Second, IPAs are faced with *external* challenges, which refer to their interaction with other actors, primarily member states. The bureaucracy is constantly challenged to fulfill tasks delegated by its political principals. Every unwanted deviation from the formulated political agenda can be understood as an agency slack (Hawkins et al. 2006a, p. 8). Given that IPAs have their own preferences, they require a certain robustness to defend their position vis-à-vis the member states. The ability to justify past or future actions becomes crucial to realize bureaucratic interests. Bauer and Ege (2017) highlight administrative resources and statutory powers as important factors for what they call "autonomy of action." Further scholars emphasize various tactics and administrative tools that IPAs employ when dealing with the member states. Examples of these include an IPA's use of information instead of formal rules (Jörgens et al. 2016), the independent generation of budgetary resources (Goetz and Patz 2017), and an entrepreneurial administrative style (Knill et al. 2019).

The two dimensions are not necessarily unrelated to each other. An IPA that is coherent internally might be better in coping with challenges externally. However, both the sources of arising challenges are different and so are the mechanisms to overcome them. IO research has long ignored the internal dimension of IPA functioning, which led to a biased understanding of IOs' features. Today, the inward–outward perspective becomes a central conceptual tool to study IO bureaucracies, be it the question of an IPA's autonomy (Bauer and Ege 2017), its administrative styles (Knill et al. 2019), or its overall strategic actorness as this article describes.

In sum, the internal challenges refer to an IPA's *internal coherence*, i.e., its ability to act as a unified single entity, while the external challenges refer to an IPA's *external robustness*, i.e., its ability to justify past or future actions vis-à-vis the member states. The internal coherence and external robustness can then be translated into what scholars describe as power or authority (Cox and Jacobson 1973). In other words, the stronger the strategic actorness of an IPA, the greater its potential for influence in global governance.[3] Thus, strategic actorness can be seen as an opportunity structure for an IPA's bureaucratic influence.

3 The Impact of Evaluation on an IPA's Strategic Actorness

How can an evaluation system as an institutional practice affect an IPA's strategic actorness? We refer to a broader term, "evaluation system," to encompass the overall organizational structure, rules, and instruments that define evaluation activities (Leeuw and Furubo 2008). In line with rational choice institutionalists (Hall

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[3] The term 'influence' is understood as "having an effect" on IO policy-making (Eckhard and Ege 2016, p. 964.).

and Taylor 1996, p. 942 f), we treat IPAs as self-interested actors that use institutional design to maximize their utility. It is an established finding in evaluation research that stakeholders seek to influence evaluation systems for their own advantage (Bjornholt and Larsen 2014; Weiss 1993).[4] The most influential stakeholders have been found to be those who control the institutional factors of the evaluation system (e.g., its budget, staff, and agenda setting; Højlund 2014b; Azzam 2010; Stockmann et al. 2011). In most IOs, it is the IPA, and not the member states, that exerts control over evaluation and can use evaluation results strategically (Eckhard and Jankauskas 2019).

Firstly, IPAs may enhance their *internal coherence* by using evaluation both for vertical and horizontal coordination within their own ranks. Vertically, the leadership can set the evaluation agenda and thus prioritize the issue areas on which organizational units should focus. It can also use gathered information during the evaluation process to prevent the bureaucratic leeway of distinct departments. Horizontally, the evaluation process may bring different organizational units together and help to align their views regarding both the activity under evaluation and future actions. Additionally, the management may seek to shape the evaluation results in a certain way to strengthen the image of a unified IPA's position.

Second, IPAs may strategically use evaluation to enhance their *external robustness*. The process of evaluation includes numerous interactions with key stakeholders (e.g., through stakeholder consultation). This allows the bureaucracy to map member states' preferences and test issue saliency. This way, bureaucratic initiatives with low likelihood of success can be avoided in advance. Furthermore, by having full control over the evaluation system, the administration can shape evaluation results in a certain way, which allows it to increase the reliability and credibility of its own initiatives.

Nevertheless, to control for potentially negative impacts of an enhanced evaluation system, one should consider the internal administrative burden and potential tensions among the organizational units. Also, if controlled and designed by the member states, evaluation techniques might serve as tools for control over the IPA (Eckhard and Jankauskas 2019).

4 Research Design

For the purpose of this study, the European Commission is treated as an international public administration. As such, it has its own secretariat and is distinct from key political bodies of the EU (the European Council and the European Parliament). It thus conforms to the definition of IPA as formulated by Biermann and Siebenhüner (2009, p. 37): "hierarchically organized group[s] of international civil servants with a given mandate, resources, identifiable boundaries, and a set of formal rules of procedures" (see also Eckhard and Ege 2016). Some parts of EU research look even deeper into the Commission and differentiate between its political level (the

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[4] This refers to a political rather than functional or conceptual evaluation use (Johnson et al. 2009; Weiss 1998; Højlund 2014a).

College of Commissioners) and its technical level (the Directorates-General; see Bauer et al. 2018, p. 12). To reduce complexity, we treat both levels as part of a single international bureaucracy.

As an IPA, the EC must respond to both internal and external challenges. Internally, the question of structural fragmentation is relevant, given that the Commission is composed of its President, the Commissioners, and administrative bodies called Directorates-General (DGs). In total, about 32,000 permanent and contract employees work in the Commission (European Commission 2019a). When it comes to strategic planning and preparation of legislative proposals, distinct organizational units at different levels may have diverging interests, hindering the Commission's ability to strategically formulate a unified position. Externally, the EC is regularly challenged by the EU member states, both in the European Parliament and in the Council. It has to defend its position on various matters: in negotiating international agreements, enforcing EU law, setting EU spending priorities, and proposing new laws.

At the same time, the Commission is a most-likely case for observing how an IPA uses evaluation to strengthen its strategic actorness. The EC is among the most powerful of international bureaucracies, ranking high on measurements of bureaucratic autonomy (Bauer and Ege 2016) and delegated competencies (Hooghe and Marks 2015). The EC also exerts full control over all evaluation resources, such as the allocated budget, staff, and agenda, and the formulation of evaluation questions and methodology, which gives the bureaucracy influence over the use of evaluation (Weiss 1993). Following Eckhard and Jankauskas (2019), this makes the EC a stakeholder with the highest potential to use evaluation for its own purposes.

Yet how can the EC employ the seemingly technocratic Better Regulation Reform to strengthen itself both internally and externally? To analyze the effect of the BRR on the EC's strategic actorness, we conducted 16 semistructured interviews with senior officials both from evaluation units and from the administration in the EC. In these interviews, we asked respondents to describe the effect of the BRR on their daily working procedures and to highlight related challenges and benefits as well as the overall impact of the reform on the Commission. To get a broad yet balanced perspective, we conducted interviews with high-ranking EC officials (Deputy Secretary General, directors, heads of evaluation units responsible for the BRR implementation, advisers to the Director General, etc.) from the Secretariat-General, Joint Research Centre, and European External Action Service, as well as across seven DGs (DG Comm, DG Digit, DG Echo, DG Ener, DG Just, DG Mare, DG Near). We also interviewed one external evaluator to the EC. The interviews were recorded, transcribed, and analyzed using MAXQDA software (VERBI Software, Berlin, Germany) to build a better overview of statements. For a detailed list, see Table 2 in the online appendix.

Based on these interviews, we were able to identify specific BRR tools that constantly appeared in our discussions and were claimed to be of highest importance for the Commission. By focusing on these tools (listed in Table 1), we then analyzed how they correspond to the expected internal and external dimension of EC actorness as outlined in the theory section. To be sure, we did not seek to cover every tool that

Table 1 Key tools of the Better Regulation Reform to strengthen the strategic actorness of the European Commission

BRR tool	Political function	Effect
Internal coherence (collective agent dynamics within the EC)		
Political validation	Vertical coordination	By requiring (major) policy items to be validated by the leadership, the EC can strategically prioritize its initiatives
Interservice steering group	Horizontal coordination	By creating evaluation steering groups and networks between the Directorates-General (DGs), coordinated by the Secretariat-General, the EC enhances internal interest alignment and procedural cohesion
Evaluation as staff working document	Strategic content adjustment	By taking ownership of external evaluations through staff working documents, the EC can shape the content of final evaluation output
External robustness (bureaucratic justification vis-à-vis member states)		
Evaluate first principle	Reliability enhancement	By increasing the use of evidence in the preparation of new initiatives, the EC increases its reliability and pushes member states to refer to provided evidence
Stakeholder consultations	Political interest mapping	By extensively consulting key stakeholders, the EC can map external political interests, which helps to strategically align the evaluation and legislative agenda
Regulatory scrutiny board	Credibility enhancement	By referring to the Board as an independent expert, the EC increases the credibility of its own proposals

was introduced by the BRR framework[5] or to compare them to previously existing ones. Instead, we narrowed our analysis to discuss only those tools that were reported as being of highest important for the Commission.[6]

5 The EC's Better Regulation Reform and its Impact on Strategic Actorness

The Better Regulation Reform of the EC constitutes a package of tools and rules that primarily shape how the Commission's evaluation system works. In designing the BRR, the Juncker Commission built on the initiatives of the previous Commissions, especially the Barroso Commission, so that the 2015 BRR should be treated as the most recent (and most sophisticated) outcome of a long-time effort (for a historical overview, see Schout and Schwieter 2018). At the technical level, the BRR defines how evaluations should be designed, implemented, and applied in the daily work of the Commission. Generally, the reform is intended to "ensure that political decisions are prepared in an open, transparent manner, informed by the best available evidence and backed by the comprehensive involvement of stakeholders" (European Commission 2017b, p. 4). But, as we show next, it is also a political instrument that affects the internal organizational coherence of the EC as well as its external robustness vis-à-vis outside actors. Table 1 summarizes the key BRR tools and their

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[5] For a comprehensive Better Regulation Toolbox see European Commission (2017a).

[6] The limitations and potential biases of our approach are highlighted in the discussion section (Sect. 6).

political effect as identified through the interviews. The following sections discuss each of these tools in more detail.

5.1 Internal Coherence of the European Commission

Regarding the internal dimension of the Commission's actorness, the first key BRR change emphasized in the interviews refers to *political validation* of all the Commission's initiatives by its leadership before they are included in the formal working agenda. Once an initiative is validated, evaluation road maps or inception impact assessments are finalized. The level of validation depends on issue saliency. The so-called major initiatives have to be approved by the lead Commissioner, relevant Vice-President, and the First Vice-President, while other initiatives are validated by the lead Commissioner or the Director-General of the respective DG (European Commission 2017b, p. 7). The distinction between major and other initiatives is open for case-by-case interpretation by the EC officials based on the expected impact and political sensitivity (European Commission 2017a, p. 32). Under Barroso (before the 2015 reform), a similar process of validation had been conducted by the Secretary-General, but it did not reach the political leadership in the Commission as is now the case (Kassim et al. 2016, p. 667).

Political validation contributes to the Commission's internal coherence as it enhances vertical coordination. Given that the Commission's leadership has a clear political agenda (I-7),[7] accepting or rejecting initiatives coming from lower administration levels allows the senior management to vertically steer the Commission toward the fulfilment of political goals. This significantly strengthens the Commission Presidency (see also Tömmel 2018), as it now has complete agenda control and is thus able to strategically prioritize "what issues should be stressed at a certain moment" (I-1, similar I-7).

The Commission emphasizes that political validation "should not be interpreted as a decision on a particular initiative or course of action that prejudges the outcome of any impact assessment process, stakeholder consultation or later political discussion in the College" (European Commission 2017b, p. 7). Nevertheless, it is a tool for strategic steering that is based on "political ambition" rather than technical particularities (I-1). In urgent cases of high political saliency, evaluation units may thus be instructed to "go ahead," even if a standard evaluation procedure is timely impossible (I-1, similar I-2, I-3). This, in turn, impacts the very outcome of evaluations: "[i]f we would like to change something and we need evidence to argue why, we would focus on that part [that needs to change]" (I-1). As one interviewee noted, "[t]he politics can be more important than hard evidence-based analysis at times" (I-9), and hierarchical political validation serves as a tool to force through internal politics.

The second frequently highlighted tool refers to *interservice steering groups* (ISGs), which enhance horizontal coordination relevant for the internal coherence. ISGs are coordination platforms, usually chaired by the Secretariat-General. Partic-

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[7] In the following, insights from the interviews are quoted and numbered as 'I-No.'; interview numbers are listed in Table 2 in the online appendix.

ipants are the lead DG as well as all DGs affected by the initiative under evaluation. Further DGs with core expertise in the field may also be invited. While such coordination meetings also took place before the 2015 reform, the BRR formally institutionalized this instrument and clarified under which conditions it should be created. Now, the ISGs are normally established directly after the political validation of an initiative. Throughout a series of meetings, the group discusses all phases of the evaluation process, including research questions and intermediate results (European Commission 2017a, p. 45). In addition to ISGs, the Secretariat-General chairs evaluation networks and working groups within the Commission (I-1).

This way, the EC can enhance internal interest alignment and procedural smoothness: Different views on evaluation can be discussed internally before it goes public (I-1). Given the complexity of issues and the decentralized evaluation system in the Commission (van Voorst 2017), ISGs enable the DGs to agree on relevant elements of evaluation by prioritization (I-14). Noteworthy, the steering group meets at a very early phase of the evaluation process (I-12). Given that evaluation design determines what evaluation will be able to find (Bjornholt and Larsen 2014), the Commission's absolute control over the process allows it to partially shape the outcome in advance. It allows the Commission to "set the agenda" and prepare draft evaluation road maps that are then ready to be "put to public scrutiny" (I-3).

Finally, the third tool for internal coherence refers to a newly established rule that ex ante and ex post evaluations should be presented as *staff working documents* (SWDs). This means that although evaluation studies are usually conducted by external consultants, their results are now transformed into an internal Commission document. The SWD, drafted by the lead DG, includes a summary of the evaluation process, methodology, limitations, and findings. Noteworthy, the Regulatory Scrutiny Board (RSB) checks for the quality of these SWDs based on the Better Regulation Guidelines (European Commission 2017b, p. 9). In the case of a negative RSB opinion, the lead DG must revise the report and submit it again to the RSB. This serves as an internal quality control (RSB 2018).

According to the guidelines, the SWD "should not undermine the objectivity and independence of the [external] evaluation process" (European Commission 2017a, p. 362). However, by taking ownership of the evaluation output, the EC can downplay unfavorable results as observed by external consultants or highlight favorable ones to strengthen its own proposals. In other words, the SWD allows the Commission to "weigh the views" (I-8). The Commission is now able to "really write the document" and "neutralize first reports [external studies]" (I-6). This increases internal coherence, given that both internal units and external consultancy firms may often have diverging views (I-4, I-6). Potential disagreements can now be solved in advance and do not appear in the final report, although significant deviations from the original study and the final SWD should be justified (European Commission 2017a, p. 362). To be sure, we are not claiming that the EC manipulates the results or deliberately misrepresents them. However, the SWD tool allows it to shape the language and make cosmetic content adjustments (I-11). As one official noted, "[i]t will be funny to compare what the [external] reports say versus what the staff working documents say" (I-6).

5.2 External Robustness of the European Commission

Turning to the external dimension of the EC's actorness, first, the BRR established the '*evaluate first*' principle, which means that "for any existing intervention, an evaluation should be the starting point of any discussions on performance and possible (significant) change" (European Commission 2017a, p. 327).[8] Before modifying a piece of legislation, the Commission now has to assess the existing evidence such as past evaluations related to the issue (I-2). Ideally, this fosters learning and links ex post evaluations with ex ante impact assessments.

While "evaluate first" is formally an internal procedural change, its implications for the external Commission's actorness are important. The principle increases the overall significance of the evaluation function in the Commission. Already existing evaluation output is considered again in the development of new initiatives, building a continuous policy cycle (I-2). This allows the Commission to describe its proposals as evidence-based, which in turn enhances their reliability (I-13, similar I-15; see also Schout and Schwieter 2018, p. 12). The Commission puts a lot of effort "to make sure the facts are known [to the member states]" (I-8, similar I-5, I-13, I-15). Yet considering how the Commission can shape the process of evaluation to align to its own interests, such emphasis on evaluation evidence strategically helps to defend its actions. As one senior official summarized, it helps the Commission "prove that what [it is] doing makes sense" (I-5). Another interviewee said that it gives "much more confidence" as it is harder to reject something that is said to be based on evidence (I-1). In dealing with the Commission's proposals, the politicians "now need justification and they [themselves] need evidence"—member states now "have less room to backfire" (I-1). Similarly, Knill et al. (2016, p. 1066–1067) acknowledged that the Commission's reliance on its evaluation system increases the chances of policy adoption. Radaelli and Meuwese (2010, p. 143) also highlighted that impact assessments make the EC's proposals "more resistant to attacks in the European Parliament and the Council."

Second, the BRR brought additional attention to *stakeholder consultations* during the process of evaluation. After the political validation and the ISG discussions, the lead DG implements agreed-upon consultation activities. This counts for every Commission's legislative or policy initiative. For an impact assessment, an ex post evaluation, or a fitness check, at least a 12-week online consultation is mandatory (European Commission 2017a, p. 391). Additionally, stakeholder workshops, conferences, or interviews can be organized (I-8). A synopsis report is then prepared to summarize the results, which feed back into the evaluation report.

Stakeholder consultation is primarily a formal process guided by the principles of openness and accountability. Yet the EC can freely choose whom to contact and whose interests to consider. Although a number of actors are consulted and everyone is usually free to participate, the Commission applies a careful screening in its analysis (I-3, similar I-4, I-6) and puts "top priority" on stakeholders with high influence (especially national authorities [I-4]; European Commission 2017a,

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[8] The 'evaluate first' principle has been first introduced by the Barroso Commission and later scrutinized by the 2015 Better Regulation guidelines (European Commission 2017a, p. 9).

p. 390). The lead DG may also meet them "outside the evaluations" for a more informal interaction (I-4, similar I-8).

As the Commission itself writes, "[e]arly consultation can avoid problems later and promote greater acceptance of the policy initiative" (European Commission 2017b, p. 68). In this sense, stakeholder consultations allow the EC to map external political interests (see also Knill et al. 2016, p. 1065). It "measures the temperature" and "gives a better vision" (I-14). In turn, evaluations and the resulting proposals can be better aligned to the interests of the member states before they are forwarded for approval. Stakeholder consultation is thus a tool that significantly enhances the external robustness of the Commission. An IPA's efforts to identify the political preferences of its principals has long been recognized as an important strategy to increase its influence (Bauer et al. 2017; Knill et al. 2019).

Finally, the mentioned *Regulatory Scrutiny Board* is an important feature of the BRR, intended to scrutinize the quality of produced evaluations based on the Better Regulation Guidelines (e.g., regarding the methodology or terms of reference). The RSB has replaced the previous Impact Assessment Board and has gained additional powers in terms of its embeddedness in the EC's evaluation architecture (Meuwese and Gomtsian 2015). It is claimed to be "an independent body of the Commission," which is chaired by a Commission Director-General and includes three senior Commission officials as well as three external experts (European Commission 2019c).

Although the Commission insisted for years that no additional "quality watchdog" for its evaluations was necessary (Meuwese and Gomtsian 2015, p. 486), it makes sense from a strategic actorness perspective why the political Juncker Commission decided to empower the RSB and make its role more visible. Given that a positive opinion by the RSB is needed for an initiative to move forward, the Board acts as a technocratic "arbiter" (I-10, similar I-7; RSB 2018). Having such an arguably independent voice helps the Commission avoid charges of politicization and increases the credibility of its work: "[i]t is very good that when you commit a proposal you can say to have the green light of the RSB" (I-10).[9] An approved proposal is then considered as more "defendable from the Better Regulation point of view" (I-10, similar I-7), which is important because member states tend to actually check the evidence provided by the Commission (I-3, similar I-7, I-12).[10]

Yet however technocratic and mature, evaluations always have "political edges to them" (Bovens et al. 2006, p. 322). The RSB issues expert opinions on the quality of legislative proposals, but the actual content and direction of the proposals are decided "by the political level of the Commission" (European Commission 2015). Potential misunderstandings between the RSB and the EC officials are solved internally, sometimes with the help of higher management, but no big disagreements have been reported (I-7, similar I-11). In a sense, the RSB procedure fuses the political with the technocratic, potentially putting the latter into the former's shape. While member states are driven by their party-related stands, international bureaucracies

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[9] RSB's opinions are made public. It is rather an exception that the Commission pushes an initiative which got several negative opinions from the RSB.

[10] The European Parliament's research service, for instance, routinely checks the Commission's impact assessments (Anglmayer 2016, p. 5).

need their own reference basis to make decisions. The Commission may thus use evidence and evaluations as reference to normative standards based on data rather than ideology. As one EC official put it, "[d]ecision-making remains political but we have engaged as an institution to make it based on evidence" (I-2). For instance, the RSB aims to increase quantification of impacts (RSB 2018). While this would make the EC's proposals more convincing and easier to understand, such a "reliance on simplified numerical representations of complex phenomena" has been observed as a strategy to "consolidate power in the hands of those with expert knowledge [in this case, the EC]" (Merry 2011, p. S83, S85).

6 Discussion

Above, we analyzed the effect single tools of the EC's BRR seem to have on the organization's strategic actorness. One is that by relying on *political validation*, the Commission's leadership can now better prioritize its initiatives and vertically steer the bureaucratic apparatus. The *interservice steering groups* ensure horizontal coordination that allows exchange between the DGs and helps to shape a unified position. Next to the internal coordination efforts, upgrading the status of *evaluations as staff working documents* allows for strategic content adjustment. Externally, the "*evaluate first" principle* increases the reliability of proposed initiatives, as additional emphasis is put on evidence. *Stakeholder consultations* help the Commission map principals' interests and accordingly align its own initiatives. Finally, the technocratic *quality control by the RSB* helps the Commission avoid charges of subjectivity, thus increasing the credibility of its proposals vis-à-vis external actors. This way, both the internal coherence and external robustness of the Commission are enhanced. Although similar techniques were informally applied in the Commission before 2015 (e.g., coordination efforts), having a *formal* framework such as the BRR helps to overcome silo approaches and ensures that the mechanisms are used throughout the administration.

But what about potentially negative implications of the BRR on the EC's strategic actorness? First, no internal issues regarding the magnitude of the Better Regulation toolbox were reported. While the reform is perceived to be complex and not every tool has so far been fully implemented (see also Schout and Schwieter 2018), the EC staff seems to be very familiar with the BRR tools. While some DGs had to create new positions for the reform implementation, many of them already had evaluation officers who now took over the responsibility. Also, the increased focus on evaluation does not seem to create internal tensions. The introduced political validation alleviates the internal competition between the DGs (I-16), as decision power is now much more concentrated around the Vice-Presidents. This also helps reduce internal structural fragmentation. Finally, given that the EC fully controls the implementation of the BRR, the latter cannot be really used as a tool of control by the member states (Eckhard and Jankauskas 2019; Weiss 1993).

In light of this, the question arises as to what extent the introduced BRR has affected the overall influence of the Commission on EU policy making. An established debate exists on the Commission's influence over EU policy outputs (Kassim

Fig. 1 Reduction in the European Commission's legislative ambition, 2014–2018 (source: European Commission 2019b, p. 1)
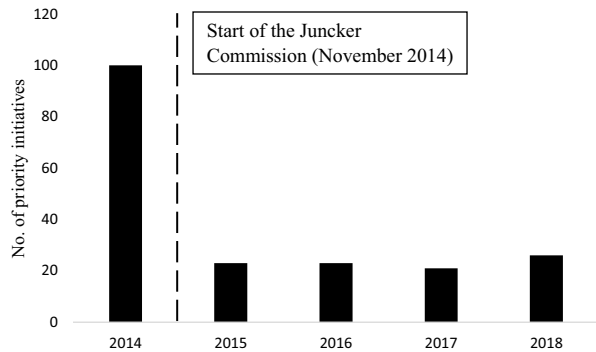
et al. 2016; Steinebach and Knill 2017). This strand of the literature has highlighted the reduction of the Commission's legislative activity—a phenomenon generally defined as "policy dismantling," i.e., "the cutting, diminution or removal of existing policy" (Jordan et al. 2013, p. 795). The lowered activism of the Commission has in turn influenced the overall "legislative output of the European Union as a system" (Kassim et al. 2016, p. 669).

Importantly, this trend of policy dismantling has become much more pronounced under the Juncker Commission (see Fig. 1). As the studies mentioned above imply, such a change requires both internal coherence and external support, especially considering costly organizational efforts and path dependencies that usually prevent bureaucracies from policy dismantling. In this regard, our findings on the enhanced strategic actorness of the EC offer a *potential* micro-level explanation for the Commission's ability to successfully change the patterns of the EU decisional output.

To be sure, strategic actorness provides an opportunity structure to be exploited, which thus means that our findings in this regard are more suggestive than conclusive. Yet it is highly likely that the Commission indeed uses the BRR potential for enhanced strategic actorness, especially considering its entrepreneurial administrative style and opportunism (Knill et al. 2016). Importantly, we do not suggest a net gain in strategic actorness of the Juncker Commission. Further factors, such as the growing agenda-setting power of the European Parliament or clashes with the member states on the rule of law (Bauer et al. 2018), might also affect the Commission. However, what we can conclude is that at least the described Better Regulation tools, identified through the expert interviews, do strengthen the Commission's strategic actorness on both internal and external dimensions.

Finally, our findings mainly refer to data from interviews with EC officials, who might be biased toward their own organization. This should be taken into account, especially when considering the external dimension of strategic actorness. Further qualitative interviews, especially with the member states, could help substantiate our claims. Similar to the contributions by Hoerner and Pattyn et al. in this issue, further studies should analyze the context in which member states discuss the EC evaluations both at the national level and in the European Parliament. In this study, however, we drew on an interpretive approach, aiming to grasp the institutional context of the Commission by focusing on experiences and insights of people working in that

context (Yanow 2000). This allowed us to obtain in-depth knowledge of micro-level particularities surrounding the Better Regulation Reform. In this regard, our micro-level finding in favor of the Commission's strategic actorness corresponds with other studies highlighting the enhanced policy-making influence of the EC (Kassim et al. 2016; Peterson 2017; Steinebach and Knill 2017; Tömmel 2018).

7 Concluding Remarks

While conclusions on a net gain in strategic actorness of the European Commission cannot be drawn, it has become clear that the described BRR dynamics enhance the strategic actorness of the European Commission both in terms of its internal coherence and external robustness. The analyzed tools contribute to better coordination and interest alignment *within* the Commission and enhance its ability to justify its own initiatives *vis-à-vis* the member states.

These findings contribute to the literature on the European Commission, IPAs in general, and research on evaluation. First, while some argue that the Commission is mainly a technocratic actor (Haverland et al. 2018, p. 329; Princen and Rhinard 2006), others highlight its shift "from the technocratic mode to politicization" (Radaelli 1999, p. 766; see also Kassim et al. 2016; Wonka 2007). In this regard, our study demonstrates that the Commission is able to use its technocratic image for strategic purposes. Although the increased role of evaluation intuitively seems to be a threat for a bureaucracy (Mastenbroek et al. 2016), we show that a deliberately designed evaluation system might bring strength to the EC in terms of internal coherence and external robustness. While member states may want to contain the Commission by enhancing its accountability through new public management tools, we provide an alternative view on how the EC may use the BRR to enhance its own influence potential. This is in line with Wegrich's (2015, p. 371) concerns that the EC will wrap its political preferences "in the language of 'evidence-based policy making.'" Indeed, as observed by Cram (1993) and formulated by Wendon (1998, p. 340), the Commission is "able to marshal innocuous-looking instruments to achieve surprising results." The increasing "development of instrumentation" in the EU might be driven not only by functional but also by political interests, when "instruments also produce their own 'politics'" (Radaelli and Meuwese 2010, p. 136; see also Lascoumes and Le Galès 2007).

Second and related, although this is a single case study on the Commission, we expect that similar dynamics should be observed in other IOs, especially where IPAs have ultimate control over their evaluation systems (Eckhard and Jankauskas 2019). The article thus speaks to a growing scholarship on the influence of IO bureaucracies in IO policy making (Bauer et al. 2017; Biermann and Siebenhüner 2009; Eckhard and Ege 2016; Eckhard and Jankauskas 2019; Jörgens et al. 2016; Hooghe and Marks 2015; Eckhard et al. 2018; Knill et al. 2017, 2019; Trondal et al. 2010). The study highlights that to understand an IPA's influence, scholars should avoid "an inclination to 'black-box' individual institutions" (Kassim et al. 2016, p. 654) and should rather consider important intraorganizational factors.

Finally, the article highlights the political notion of evaluation use, thus tapping into a long-standing debate on the politics of evaluation (Bjornholt and Larsen 2014; Eckhard and Jankauskas 2019; Taylor and Balloch 2005; Weiss 1993). In general, we provide a further empirical example of how evaluation may affect key stakeholders beyond the functional imperatives of efficiency, learning, or accountability. In particular, we underline the influence of an international *bureaucracy* over its evaluation system—a phenomenon that has been observed at the national level (Bjornholt and Larsen 2014) and is starting to spread across IOs at the international level (Raimondo 2018).

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