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Translation and Translators in Policy Transfer Processes

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The notion of "*translation*" has been used in different disciplines and analytical perspectives, and for different purposes. With an increasingly globalized and transnational context of public decision-making, it has also raised new research questions in political science, especially in the field of public policy studies. Those research questions include, most importantly, understanding translation and the specific role and influence of translators in policy transfer processes.

Policy transfer processes share with the concept of policy diffusion the idea, challenged by the notion of circulation (Saunier, 2004, Vauchez, 2013), that there is a starting point of the process and an ending point. Like the policy diffusion literature, policy transfer literature also attaches a great importance to different mechanisms (voluntary or imposed) in processes. It sheds light on the role of *learning* and *lesson drawing* (Rose, 1991) and emphasises the impact of competition in the context of globalisation. At the same time, policy transfer is less interested in the extension of the process, which is the key puzzle of the policy diffusion perspective, because it is focused on the use of elements taken from a public policy in a given political system in another political system (Dolowitz, Marsh, 2000). Instead, it addresses more directly the issue of the content of the transfer, by differentiating the dimensions of a

public policy (goals, knowledge, paradigm, norms, institutions, instruments) and the issue of the impact of a policy transfer (Delpeuch, 2008). Moreover, the role of transfer entrepreneurs is more directly taken into account, especially international or transnational actors (Stone, 2004) who act as policy exporters.

Following these thoughts on policy transfer, the objective of this chapter is to contribute to a better understanding of the policy transfer processes, stressing the role of specific actors, by using the notions of translation and of translators. Translation suggests a "move away from thinking of knowledge transfer as a form of technology transfer or dissemination, rejecting if only by implication its mechanistic assumptions and its model of linear messaging from A to B" (Freeman, 2009: 429). It differs from transfer on the one side because it is focused on the role of specific actors in the transformation process of policy orientations and design, which are travelling across different spaces and levels (Muktharov, 2014), on the other side because it grasps the effects of the policy transfer in order to understand not only the policy formulation process, but also policy implementation.

First, we show that the notion of translation has its origins outside political science but that it was progressively integrated to political science perspectives. Second, we identify four analytical displacements related to the analytical potential of the sociological translation framework combining three dimensions: the discursive dimension, the actor's dimension and the institutional dimension. Third, building on the theoretical and methodological discussion, we present empirical studies illustrating the translation of policy concepts, institutions and instruments across different levels, organizations and countries. As such, we show that analyzing translation processes and the role of translators in policy transfer is a contribution to the debate on the combination of convergence and divergence in global diffusion (Levi-Faur and Jordana, 2005) and to the analysis of policy change.

1. The notion of translation

In order to define and characterize the notion of translation, it is necessary to understand its origins and conceptualization outside political science as well as its progressive integration to different political science perspectives. These different

disciplinary and analytical perspectives can inform the theoretical debate on translation and the role of translators in policy transfer processes.

Translation outside political science

The notion of translation has been first developed in philosophy, literature and language studies (Benjamin, 1923; Eco, 2007; Ricoeur, 2004). These perspectives can be summarized by the Italian phrase "*traduttore, traditore*" (translator, traitor). Translation cannot be something else than the transformation of the original text. It corresponds to an interpretation and as such, necessarily, to a new creation different from the translated text. Accordingly, a translation can be indefinitely started again and many translations of a same literary text exist using each a different wording or even a different language. The meaning of the translation also differs from the original text because meanings and connotations are different from one language to another, all of them embedded in a different culture, which is changing over time. In a more sociological perspective (Bourdieu, 2002) the understanding of the translation of texts has also to take into account the conditions of its reception in another country. The sociological analysis of reception has to grasp not only the identity of the translator and the broader cultural and intellectual context, but also the selection process: of the translator, of the collection of books or journal in which the translation is published, of the presentation of the translation…

Transposed to policy studies, translation corresponds to the process of reformulation of policy problems, orientations and proposals in a different language and cultural context. Translation can be more or less complete and more or less far from the original formulation. It implies analyzing the policy discourses using international, transnational and/or foreign references and to focus on two main questions: how are these references translated and how do they legitimate policy proposals? The discursive dimension of translation can be analyzed in a pragmatic perspective which has been developed rather recently in the field of policy studies (Zittoun, 2014), in relation with the argumentative turn in policy analysis (Fischer, Forrester, 1993) and the development of the policy narrative framework (Shanahan and al., 2017). This approach gives a great importance to the cognitive, discursive and analytical skill of the actors to define concepts and situation, to argue, to develop strategies, to discuss, to persuade and to convince, to build agreement and disagreement with

other, to give meaning to their purpose, to adapt themselves to the different contexts, etc. It takes seriously into account the circulation of policy proposals among policy actors and the way they differently interpret them. It is clearly inspired by the Weberian comprehensive perspective and the constructivist approach, which considers that behavior is linked to the subjective meaning actors give to it.

The second perspective outside political sciences which can inform the understanding of translation processes builds on the sociology of sciences which has been developed in a pragmatic perspective, using the notion of translation in relation to actors and interactions between them and developing the theory of the network-actor (Akrich, Callon, Latour, 2006). Michel Callon (1986) analyzed the knowledge transfer from one scientific world to another and proposed an analytical translation framework, based on the distinction between four intertwined dimensions:

- the reformulation of a problem,
- the negotiation between the different actors involved in the process of reformulation,
- the assignment of different roles to these actors during the process
- the mobilization of actors in the process that allows the achievement of the action.

This conceptualization of the translation processes points out the role of actor's interactions, which are even more important in public policy fields than in scientific fields. In the world of public policies the discursive activity of translation is also a political one, implying negotiations and conflicts between different policy actors with different kinds of resources, different conception of the policies to be conducted and different policy goals. On the one side, there are negotiations in order to build a coalition supporting the policy statement proposals shaped and defended by the actors involved in the translation process. On the other side, there are conflicts with policy actors defending alternative policy statement proposals or simply opposing policy changes in a veto-player logic. These interactions are political in the sense that they are related to the resources (positional, expertise, financial, relational, legitimacy and time) of the different policy actors involved and related to the issue of authority and power in the policy process. Thus, the mobilization, negotiation and conflicts between different actors in the translation process, centrally highlighted by the

sociology of sciences, are another key element for a sociology of the translation process, embedded in structures and power dynamics across different traditions and forms of knowledge related to the public policy concerned. This perspective stresses the fluid and dynamic nature of policy, because "*a series of interesting, and sometimes even surprising, disturbances can occur in the spaces between the creation, the transmission and the interpretation or reception of policy meanings*" (Lendvai & Stubbs, 2007).

The third perspective is a historical one insisting on crossing and circulation. The "crossed history" perspective -*histoire croisée*- (Werner and Zimmermann, 2003) draws on the debates about comparative and "connected history" highlighting the intercultural dimension of transfer. It focuses on interactions between different societies and cultures, scholarly disciplines and traditions in time. This perspective emphasizes the interactive (reciprocal and/ or asymmetric) and dynamic character of transnational transfer processes. It can be linked to the concept of "circulatory regimes" (Saunier, 2004) which also puts forward a relational understanding of history highlighting the interconnection of actors, institutions and levels (Hopkins, 2006; Bayly, 2004). Circulation hereby refers to intense interactions between different actors with different forms of institutionalization and with different cultural backgrounds in international or transnational circulation processes.
For policy transfer studies it means that translation can be understood as a crossing between different social and cultural productions. Rather than a linear process of reformulation or reinterpretation, translation reflects dynamic and intense (back-and-forth) circulation processes. As such, translation is understood as form of intercultural interaction connecting different actors, institutions and levels in public decision-making.

The integration of the notion of "translation" to political science perspectives

The notion of translation was progressively integrated to political science perspectives through studies emphasizing the very different impact of transfer of political institutions, in terms of transplant or rejection (Mény, 1993) and then in neo-institutionalist approaches (Campbell, 2004).

Empirical studies on political institutions have pinpointed that policy transfer does not only result from the circulation and appropriation of discursive material but also from the interactions of actors at different levels. Badie (1992) shows, for instance, that external approaches and ideas are appropriated, reinterpreted, reformulated and adapted by actors pursuing national strategic objectives by linking the formation of new national elites to the transfer and integration of Western political models. This link between translation and internal political power plays are also demonstrated by Carole Sigman (2010) in her analysis of administrative reforms in Russia which were inspired by the New Public Management (NPM) approach. She argues that there is link between those administrative reforms and the assertion of new administrative elites who are familiar with internationally transferred NPM principles and who want to increase their authority and power within the bureaucracy. Accordingly, translation processes have an important political dimension which is determined by the power relations, interests and strategies used by political actors, i.e. in particular the translators. This study on New Public Management points to strategic knowledge production and diffusion of standardized policy models as international norms.

John Campbell (2004) adds the institutional dimension to power interactions. He highlights the importance of the institutional context in the implementation of internationally diffused policies. In his institutional perspective, translation depends of four main factors:

- the institutional context,
- power struggles,
- leadership support and
- implementation capacities (ibid. p. 82).

Policy actors are not only constrained by other actors but also by the existing institutions, inherited from past public policies, which determine the policy process, especially the implementation capacity. Therefore, translation has to be analyzed during the whole policy process: from problem construction to policy implementation, a policy stage less taken into account in policy transfer studies.

Furthermore, studies on the implementation of European directives (Green-Cowles, Caporaso, Risse, 2001) show that in many cases European rules and regulations are sometimes incompatible with domestic institutions (case of misfit). In such cases, EU

directives create pressure for national governments to adapt. However, institutional change is not automatically implemented in member states. The national settings are both determining preferences and capacities of political and administrative actors for implementation of European norms at the national level, in relation with the fit or misfit between national and European levels. Translation is one of the type of implementation of European directives corresponding to the limitation of the impact of European norms (the other ones being absorption, transformation and inertia). Similarly, studying the case of Ukrainian Asylum Law Irina Mützelburg (2019) points to interdependencies in the transfer of international norms due to specific actor constellations.

Also in the neo-institutionnalist perspective Streeck and Thelen (2005) have developed a useful model for analyzing the question of institutional translation. This model can be linked to Scharpf's understanding of institutions since both understand institutions as formalized rules that determine the courses of action of actors (Scharpf 1997: 38; Streeck and Thelen 2005: 9). According to the model of Streeck and Thelen, institutional change can either be incremental or abrupt with different effects on institutions (cf. Streeck and Thelen 2005: 9, 20-31). They note that through that process, institutions are redirected to new objectives and goals but that there are often unintended consequences. Change requires compromise between interests and actors (ibid: 26). This can be related to the analysis of Rein and Schön (1996) who noted already in 1996 that "*policy objects only partly result from the work of policy designers*" (Rein und Schön 1996: 93). Instead, institutions are being formed and changed as they are being implemented.

Last, the neo-institutionalist perspective in relation to translation has also been developed at the local level, especially in Scandinavian studies. They point out that the recursive intertwinement of theorization and translation, and the interaction between local and field-level processes, proves decisive for how institutional change unfolds over time (Nielsen et al., 2014). To summarize the neo-institutionalist perspective sheds the light on two dimensions grasped by the notion of translation: policy implementation and policy change.

Thus, translation is a central notion both outside and in political science and allows to link discourses, forms of knowledge, cultures and policy processes. The concept of translation emphasizes the need to move away from a linear approach to policy transfer processes contrasting the external and internal towards a more sociological understanding of complex and dynamic interactions in transnational policy-making processes. Adopting a translation perspective means linking different political levels, studying the discursive and institutional changes which are both informed by and informing change in other contexts, and the role of specific policy actors, the interconnected translators, in the policy process.

2. The policy translation framework and its operationalization

Translation as a policy process analytical framework corresponds to four analytical displacements related to policy transfer studies. The first one is that a main attention is drawn to the national and local levels rather than to the international level, i.e. international organizations and related actors, especially transnational experts (Zeigermann 2018). The focus is on the levels where ideas, designs and instruments are transformed, reformulated and implemented.

Therefore (second displacement), regarding the policy process, the approach grasps not only policy formulation (the key stage in policy transfer studies) but also policy decisions and the implementation of policy ideas, designs and instruments elaborated at other levels. The construction of standardized policy models in order to make them transferable is a growing concern in policy transfer studies (Ancelovici, Jenson, 2012): the focus of translation is different. It aims to understand the reception, the transformation and the implementation of policy models. Therefore translation can also be defined as a shift from an exportation perspective to an importation perspective.

The third displacement is the attention given to the complexity of the policy process. Transfer studies tend to focus more on the content of the transfer, so as the notion of hybridization, close to translation, but only concerning the content dimension (in other words the output of the translation process), less on the process which is the key issue tackled by the policy translation framework. Studies on transfer in a global economy, for instance, focus on international diffusion and convergence of economic

approaches rather than critically studying historically and culturally embedded constellations and interactions of actors who are involved in those transfer processes (Zeigermann and Tulmets 2019). Thus, the focus needs to be on the actors of the transfer.

This fourth displacement corresponds to a move towards an actor-centered perspective taking into account the sociology of translators. They can be analyzed as the “international brokers” (Dezalay, 2004) who hold positions at national and international levels and practice a “two-level game” in order to reinforce mutually both kind of positions or “transnational policy entrepreneurs” (Stone 2019). Hence, these key actors, who were for instance sociologically studied in the case of State reforms in Latin America (Dezalay, Garth, 2002), play a double role: an importer and an exporter role and circulate between different institutions and policy levels. They can also be defined as intermediary actors (Nay, Smith, 2003) not only brokering between different policy actors but also involved in the construction of common understanding of policy proposals, formulated in the relation with policy transfers.

Therefore the policy translation framework combines three dimensions:

1. The *discursive dimensions* corresponding to the analysis of the reformulation of policy problems, policy ideas, policy designs, policy instruments coming from international institutions, transnational actors and /or other countries in order to make policy changes acceptable and legitimate at the national level. It contributes to the understanding of the content of the policy transfer.
2. The *actor’s dimensions* corresponding to the analysis of the actors involved in the reformulation process abovementioned (i.e. the translators), of the mobilization of actors for and against a policy transfer and of the power interactions between them. It contributes to the understanding of the policy process.
3. The *institutional* dimensions corresponding to analysis of the adaptation of the transferred policy, ideas, design and instruments to to the existing institutions and the institutional resources provided to the different actors during the policy process. It contributes to the understanding of the implementation of the policy transfer and the scope of related policy changes.

This framework implies the need to study empirically and in a comparative way the interplay of the discourses, actors and institutions. Reformulation of policy problems and change of policy orientations, policy designs and policy tools can be studied through discourse analysis because texts are a medium of interaction, characterizing routinized practices and allowing the identification of different types of frames related to normative and ideational frameworks in social systems (cf. Giddens 1984, Rein and Schön 1996). In particular, frame analysis was developed to analyse the constructive function of language for political decision-making; i.e. for analysing policies and policy action (cf. Hänggli and Kriesi 2012; Hulst and Yanow 2014). Accordingly, frame analysis is well-suited to combine the discursive dimension with the institutional dimension and the actors' dimension in policy translation.

In addition, analysing the mobilization of actors in policy circulation processes and the power dynamics between them requires, however, a careful analysis of processes of interactions. Consequently, discourse analysis alone is not sufficient to understand complex social processes of actors. Data from interviews and participant observations are therefore also important additional information to study translation processes. Conducting interviews is essential to understand in greater detail and beyond the formal discourse presented in publically available official documents. It allows understanding if and to what extent there are conflicting interests, the interpretation of policy objectives, instruments and their implementation, as well as experiences with institutional settings (see: Rucht and Gerhards, 1992). As such, interviews can shed light on both "technical knowledge" (Bogner and Lenz 2009: 71) in "process knowledge" (Bogner and Menz 2009: 71) which is linked to practical knowledge on a specific context of interaction. These two sets of information are essential for understanding policy translation. The sociology of translators also requires to work on the personal trajectories (especially training and professional careers) in order to understand their involvement in policy transfer processes, the orientation of the reformulation of policy ideas, design and instruments they propose, their links with other actors (at different levels), so as the nature and level of resources (knowledge, institutional position, legitimacy and degree of acceptance of the proposals, degree of fit between the proposals and the problems they promise to solve) they are holding. This sociological analysis, based on interviews and on

available biographical data, helps to understand the strategies of the translators, in relation with policy learning processes on the nature of the main problems in the policy field concernd, the policy instruments (content, potential impact, way of implementation) and the formal and informal rules structuring the interactions between the different actors of the policy field (strategic policy learning: May 1992) at different levels.

3. Comparing translation processes

In this last section we illustrate the operationalization of the policy translation process with two examples corresponding to the two main translation cases: on the one side from international organizations (where translators are located) to national policies (with strong interactions between the two levels), on the other side across countries (without a direct involvement of international actors in the translation process).

Translating from international organizations: the institutional translation of "Policy Coherence for Development"

This first empirical case study offers findings from the analysis of the epistemic community for 'Policy Coherence for Development' and the circulation of knowledge at the intersection of international organizations and member states. 'Policy Coherence for Development' (PCD) generally stipulates that international cooperation policies and all other public policy areas affecting poor countries should contribute to promoting sustainable development and eradicating poverty – not only domestically but also in developing countries. This claim involves two dimensions: The first dimension refers to the absence of incoherencies across different sectorial policies (negative definition). The second dimension entails the promotion of positive synergies through making policy coherence for sustainable development itself an overarching policy goal (positive definition) (Ashoff, 2005). The idea of PCD has become a central feature of sustainability policy over the last decade and was also integrated as a target for Global Partnership (SDG 17) in the 2030 Agenda for Sustainable Development. Through the notions of 'incoherencies' and 'synergies'

across policies overcoming challenges between knowledge and governance for sustainability policy through integration appears to be an inherent element of the PCD concept.

Notes on data collection and analysis

The case study is based on 49 semi-structured expert interviews with different actors from the PCD Focal Points established by the OECD, participant observation conducted in international meetings focusing on Policy Coherence for Development organized by the OECD and qualitative analysis of official documents the paper. Data was collected between 2013 and 2015. The study of publicly available documents and qualitative content analysis of texts was undertaken as a first approach to the research object. Document analysis focused on official international PCD strategies and framework reports – most of which were published between 2009 and 2015 – but also internal documents, including agendas, invitations and minutes of meetings, CODE reports.

In order to understand interests of actors as well as their mobilization and interactions (actors' dimension) beyond the formal discourse presented in official documents semi-structured expert interviews were conducted (approach inspired by Kaiser, 2014, pp. 51–88) with analysts and officials from the OECD and other international organizations taking part in meetings of the PCD Focal Points, representatives from national governments, scientists from diverse research institutions and actors from NGOs.

Finally, participant observations included official PCD Focal Points meetings but also informal meetings of the PCD Unit in the Office of the Secretary General in the OECD between October 2013 and March 2014. Types of observation and main methodological approaches were based on Sarantakos (2012: 229f).

Discursive translation and the production of knowledge in the OECD

According to the OECD, the idea of policy coherence for development (PCD) emerged in the Development Assistance Committee (DAC) of the OECD in 1991 in the context of international debates on aid effectiveness (OECD/DAC 2003: 2). Following these debates, the OECD recommended, "*governments need to ensure that their policies on issues which go beyond aid and development assistance are*

supportive of, or at least do not undermine, their development-focused policies. This is the policy coherence for development (PCD) agenda." (OECD 2009: 15). This definition of PCD highlights the importance of avoiding incoherencies in order to prevent unintended negative effects of international cooperation. It raises the question, however, if the policy coherence for development agenda represents a new approach or if it is rather a reformulation of the "*do no harm approach*" (OECD 2009c). Recognizing the similarities between the two concepts, OECD officials stated that the focus on incoherencies and "do no harm" is only one dimension of PCD (OECD 2009b). As for the second dimension, the OECD explained "*The OECD now sees PCD as a process for integrating the multiple dimensions of development at all stages of policy making* (OECD 2013: 2) This second dimension needs to be considered in the greater context of the crisis of the liberal peace-building (see for instance Hegre 2004; Chandler 2010; Selby 2013), wide-spread criticism of the concept of aid (Moyo and Ferguson 2010; Easterly 2014) and new ideas related to inclusive development partnerships, capacity development and comprehensive approaches to development (Englehart 2009; Joshi 2011; Kim and Lee 2013; Blake 2014; Mawdsley, Savage, and Kim 2014). Through controlled appropriation, adaptation and interpretation of international debates in development and international cooperation policy the OECD reformulated policy problems and translated them as PCD problems.

The debates on the formulation of the post-2015 Sustainable Development Goals and in particular on SDG 17 to "strengthen the means of implementation and revitalize the global partnership for sustainable development" (UN Division for Sustainable Development 2016) have contributed to new discussions within the epistemic community for PCD. Both the OECD and the EU wanted the concept to be integrated into the new framework for development. As a consequence, an online dialogue was organized (18-22 November 2013) and a poll arranged by the OECD to discuss and to vote the definition and a new "name for "policy coherence for development". In the following, the name was changed in the OECD from "policy coherence for development" to "policy coherence for inclusive and sustainable development" (OECD 2013) and later into "policy coherence for sustainable development" with "PCSD" as the new acronym (OECD PCD Unit 2014). It can be critically questioned if the new name also reflects a change in the meaning of the

concept or if it can be understood as merely as an exercise of *labelling*. In any way, it illustrates the important discursive dimension of translation processes because the new terminology allowed to integrate the concept into the SDG framework and thereby also contributed to institutional change.

The actor's dimension in PCD translation processes

The creation of the OECD/PCD Focal Points in 2007 was based on a common initiative of the Development Assistance Committee (DAC) and the OECD Directorate for Development Cooperation (DCD) and the Development Centre in the Secretariat with the overall objective to promote learning on policy coherence for development in the OECD. The purpose was to exchange knowledge and experiences between political actors from member states, experts from international organizations, scientists and other relevant experts. Accordingly, the network was formalized to improve and ensure translation through knowledge circulation on PCD, and mutual learning through meetings, moderated international conferences and advice with an exclusive but trans-disciplinary character. This forum can be understood as the institutionalization of translation activities of the international epistemic community for PCD, which is oriented towards a reformulation of public goals and mobilization for development.

Translation activities within this international platform are structured and moderated by OECD officials, who are scientifically trained and who have substantial experience in working at international level with people with different professional backgrounds and interests at the intersection between science and practice. The main tasks of the experts of the OECD/PCD Unit with regard to the Focal Points was to interpret political problems from member states into new research questions, and to translate structure and scientific findings according to current trends and challenges in politics. This target-group oriented intermediation was expected to facilitate the transformation of knowledge and political interests into usable approaches for sustainability policy formulation.

A challenge for integration was widespread skepticism, ignorance and even opposition to the idea of PCD among researchers. However, the PCD Unit has identified and invited experts to present and discuss their knowledge with the other

invited guests at the annual PCD Focal Points Meetings. Agendas and reports of those meetings show that invited speakers and discussants have not only included OECD policy analysts, senior economists, scientists from research institutes or experts from other international organizations, but also NGOs and delegates from member states. However, there is a clear bias toward OECD expertise – both for the presentations and for the reading materials which are provided for participants. Analysts from the PCD Unit have formulated and provided table most documents for meetings for participants, e.g. statements about new research results and political implications, projections of political developments, PCD assessment tools, frameworks or policy recommendations based on scientific – mostly OECD – data and analyses. This clearly indicates power relations of actors involved in translation processes within those meetings.

Through the processes of preparing the agenda of meeting and inviting speakers, the OECD/PCD Unit has established new links within the organization, i.e. by creating powerful internal allies, and it has fostered cooperation with external allies, i.e. from the research and utilization sphere. These allies were asked to apply their specific thematic or methodological knowledge to the overall PCD concept and research question defined by the PCD Unit. In doing so, they have engaged in the translation process supporting knowledge transfer to practical PCD problems at different political levels and in different contexts of member states, and learning about issues with practical relevance (i.e. PCD) for new questions with regard to international cooperation.

Finally, it is important to note that the OECD/PCD Unit is responsible for documenting the debates and outcomes of meetings in summary reports and protocols which are made available for participants, and which have fed back into new reports and policy recommendations. Those reports and policy recommendations have been published online or as printed documents in order to reach relevant stakeholders. Through this strategic use of specific media and provision of practice-oriented information, the PCD Unit has promoted mutual learning with relevance for public goals but also increased its own power and influence in international public debate and its authority within the organization. It can therefore be argued, that orientation in regard to allies

and a focus on relevance for public goals among political actors were strategically used by professionals of the OECD PCD Unit in order to contribute to a proliferation of the idea beyond the initial epistemic community which has led to a global agreement on PCD standards in the 2030 Agenda for Sustainable Development (2015, SDG 17).

Institutional translation

The analysis of this section is based on a comparison of pre-existing institutional structures in France, the UK and Germany with new developments that are related to PCD. Those developments include both the reorientation of existing structures into a new PCD context and the introduction of new institutions and mechanisms.

With the Paris Declaration on Aid effectiveness (OECD/DAC 2005), including a strong political commitment to Policy Coherence for Development, ministries for development in France, the UK and Germany have increasingly linked their work to other departments and agencies. Furthermore, following this international commitment agreed by the heads of state and government of OECD/DAC countries, the mandate of development agencies was extended beyond the responsibilities for their own departments towards coordinating activities of other sectorial departments and thereby enhancing policy coherence for development across government. As such, the British DFID and the German BMZ have both participated in Cabinet meetings and in interdepartmental committees, which has formally allowed them to contribute to PCD at the highest political level and to further translate the concept across different government agencies. At the same time, embedding PCD within existing structures of interdepartmental cooperation has required little resources and little efforts. The costs for translating international PCD commitment at the level of coordination approaches were low compared to institutional reform (i.e. fundamental changes) because in the three countries it has meant labeling existing mechanisms in new terms in a first step. The institutional change has thus been incremental.

Over time, development ministries have been involved in strategic interactions of directing the objectives and activities of other ministries towards sustainable development goals through their participation in those interdepartmental committees.

For that purpose, the German BMZ has even established a new agency which is responsible for PCD-related activities. These new actor constellations in and PCD-activities in inter-ministerial meetings were not uncontested. They have contributed to power struggles between different sectorial departments and actors promoting different political interests. For instance, in France, the development ministry within the foreign ministry struggles for survival and growth. There have been conflicts between dominating foreign policy interests and development interests. Furthermore, interviews and observations showed that actors do not only seek recognition for their work at the national level through other government departments but also internationally. The international dissemination of the PCD concept and the debates on global Sustainable Development Goals between 2012 and 2015 have increased institutional interests in PCD which can notably be seen in the rivalries between the ministry for environment and the ministry for development in Germany. Although the development departments in France, the UK and Germany have been increasingly involved in meetings they have continued to play a minor role compared to the foreign affairs, home affairs or economy and finance ministries.

It can be argued, however, that those power struggles across different government departments contribute to further transfer of PCD. They indicate a broad recognition that the long-term and short-term objectives need to be combined in a joint approach to cooperation with conflict-affected regions. Rivalries between different ministries underline that the institutionalization and translation of PCD is a political act and that it reflects different interests of different political actors.

Finally, the comparative analysis of the three countries has revealed that the institutional translation of the PCD idea as a global concept differs at the national level:

- France has adopted a centralized approach to PCD focusing on French interests abroad and the reduction of institutional complexity. This centralized approach is characterized by attributing particular regulative authority for PCD to the Prime Minister and an inter-ministerial committee chaired by the Prime Minister, i.e. the Inter-ministerial Committee for International Cooperation and

Development (CICID). In contrast, the development department which is linked to the Ministry of Foreign Affairs plays a minor role for PCD.

- The UK has adopted a whole-of government approach with a particular role attributed to Cabinet. The Department for International Development (DFID) has the mandate to ensure policy coherence for development across government departments. The DFID also takes part in discussion of Cabined committees and manages the overall amount of ODA. As such, the whole-of government approach in the UK places PCD issues at the highest political level as in France but attributes more technical and prescriptive capabilities to the development department.
- Germany has adopted a decentralized approach but with an increasing role attributed to the Chancellery. This means that the German development department has the main responsibility for ensuring PCD. The BMZ coordinates its PCD activities with the ministry for environment and the foreign office which have overlapping responsibilities with regard to sustainable development integration. At the Chancellery, the Committee for Sustainable Development has been presented as an “institutional PCD effort” in international PCD reports.

Those different approaches can be explained by different pre-existing structural setting and political backgrounds in France, the UK and Germany. Accordingly, the thematic focus differs also in the three countries:

- In France, the institutional translation of the idea of PCD can be understood as “inter-ministerial coordination”. According to the centralized approach, PCD has contributed to more joint strategies, committees and inter-ministerial meetings which include mostly heads of departments and agencies. However, foreign, economic and security policy continue to influence the agenda-setting, constellations and interactions of those interdepartmental activities. As such, despite the formal mandate of the minister for development to enhance PCD, we have not identified an increasing sustainable development orientation of those committees.
- In the UK, the whole-of government approach which can be understood in PCD-terms because it reflects the government objective of integrating

sustainable development across government. Yet, the objective of policy integration remains focused on security issues. The creation of Cabinet Committees by the Prime Minister and the involvement of the DFID on issues at the intersection of security and development illustrate that finding.

- In Germany, foreign and security interests are also important priorities which are institutionalized at the Chancellery and across departments. However, a special feature of the decentralized approach in Germany is the link between environment and development, as illustrated in the rivalries between the two departments for PCD coordination.

To conclude, institutional translation has contributed to processes of incremental institutional change. The PCD concept proved to be even dynamic and flexible, it could therefore easily be linked to pre-existing actor constellations, resource allocations and modes of interaction. As such, re-orienting and translating existing structures has lead to increasing transfer through a mutual process of learning, dynamic adaptation and mobilisation of actors and reformulation of policy problems.

Translating across countries: the case of "Evidence-Based Bureaucracies"

Above the systematic use of cost-benefit assessment, the National Institute for Clinical Excellence (NICE), created in 1999, can be characterized as an "evidence based bureaucracy" in order to insist on two main analytical traits: (1) the use of evidence is highly structured by standards and protocols, which gives a bureaucratic flavor (Yesilkagit, 2004 ; Benamouzig, Besançon, 2005); (2) a high level of openness to non-state actors, like experts, citizens or interest groups, gives them meanwhile an inclusive and deliberative aspect (Moffit, 2010). Therefore it was a powerful source of inspiration for similar new institutions across Western Europe, not least because of the creation of "NICE international" in order to diffuse the methods and practices of the new agency. In France, the creation of the *Haute Autorité de Santé* in 2004 was certainly, even if not always explicitly, an attempt to mimic the way health technology assessment had been implemented in the United Kingdom (Robelet, Minonzio, 2015). In Germany, the creation of the IQWIG the same year (2004) refers more directly to the NICE and was build up as an attempt to develop the use of health technology assessment in Germany (Hassenteufel and al., 2017)

We will focus here on two aspects of the NICE which were diffused: its centralized institutional model and the systematic use of cost-benefit assessment based on Bayesian statistical methods (Benoit, 2016, p. 228) so as the definition of cost-effectiveness ratio and thresholds. By using the translation framework we aim to give some evidence in order to understand two apparent paradoxes: the reference to the NICE was more direct and explicit in Germany than in France, but the French HAS is more centralized and powerful than the German IQWIG; the use of cost-benefit assessment was defined as a new duty for the IQWIG in Germany, not for the HAS, but it is nowadays used in France, not in Germany. We will stress here the three dimensions of the translation process in these two cases which are analyzed in a long term period (from the 1990's to nowadays), showing its partial character in Germany (the agency is embedded in the existing institutional framework and cost-effective assessment tools still play a marginal role) and its incremental character in France (progressive shaping of a State narrow agency and use of economic assessment).

Partial translation in Germany

The creation of the German Institute for Quality and Efficiency in Healthcare (IQWiG), institutionally corresponding to the agency model (a public institution based on expertise and with some degree of autonomy from the State), can be related to two main factors. The first one is the intertwined diffusion of Evidence Based Medicine (EBM) and Health Technology Assessment (HTA) in Germany (Perleth, Gibis, Göhlen, 2009) corresponding to an international circulation process. It started at the end of the 1980's in the academic sphere and was in the mid-1990's sustained by the Health Ministry who financed a first feasibility study on the assessment of medical treatment and technologies (Blitzer, Busse, Dörnig et al., 1998). The second explanatory factor was the public debate on the efficiency of the German health care system after the publication of the WHO report in 2000 ranking different health systems. The relatively bad performance of Germany (ranked 25st for its global results) gave rise to a public debate and to an interest for the English system, especially the NICE which was praised by the WHO and the European Commission (Bußman, 2012: 24, 18). The debate was also fostered by the 2001 report of the expert commission on health insisting on the quality and efficiency flaws of the

German system. This helps to explain that in 2002 a report from the Frederich Ebert Stiftung, written by experts close to the SPD, proposed the creation of an institute based on the model of the NICE. This proposal was included in the SPD electoral manifesto for the 2002 elections (Weckert, 2014 : 110-111). Therefore it was not a surprise to find the creation a new institute linked to the State, especially in charge of the assessment of pharmaceuticals, in the governmental law proposal formulated in June 2003. But, it was strongly opposed by Doctor's associations and the pharmaceutical industry, sustained by the Christian-Democratic party defending the "self-administration" of the health insurance system against the strengthening of the Health Ministry (Bußman, 2012: 25).

These oppositions explain that the IQWiG's was finally put under the supervision of the Federal Joint Committee which decides (so as the Federal Health Ministry) what diagnosis and treatment it is allowed to assess (Gerlinger/Schmucker 2009: 10). The new institute was thereby embedded in the institutional world of self-administration, more controlled by the Federal State. The other important point is that neither the possibility to realize cost-benefit assessment of pharmaceuticals, nor the role of crafting evidence-based guidelines aimed to guarantee quality, were given to the IQWIG, contrary to the initial plans of the policy reformers (among them professor Karl Lauterbach, close adviser of the Health Minister Ulla Schmidt and one of the main promoter of HTA in Germany) facing the opposition of doctor's an the pharmaceutical industry sustained by the right-wing opposition (which had the majority in the *Bundesrat*, the second Chamber, at that time).

The most important fact to stress is that the cost-benefit assessment of drugs and medical interventions which was discussed in 2003 and finally introduced in the 2007 law was not implemented because of strong oppositions and debates on the methods used. The Heath Economics Department of the IQWIG, which was created after the passing of the 2007 law, promoted the Efficiency Frontier method, refusing the British QUALY approach (for mainly ethical reasons). This reformulation of cost-effectiveness assessment in a "German way" was highly contested by academic health economics (Caro and al., 2010). The compulsory character of cost-benefit assessment was withdrawn in the 2010 law on the Reform of the Market for Medical Products (AMNOG) under a right-wing government (coalition between Christian-Democrats and Liberals). In Germany a less powerful evidence-based bureaucracy

than its British counterpart (Chalkidou and al., 2009) was created without systematically using economic knowledge, despite strong international references in the public and experts debates (Zentner, Busse, 2004). On the contrary, in France, where NICE was not directly mentioned as a model, a centralized evidence-based bureaucracy using the same cost-benefit assessment tools as the NICE (QUALYS) was incrementally institutionalized in the long term (from the 1990's up to today).

Incremental translation in France

Indeed the French "*Haute Autorité de Santé*" (HAS) was created in 2004 by the health insurance reform law (LAM) as an autonomous scientific body dedicated to the assessment of health products. But neither the Health ministry, the Social Security Direction nor the sickness funds succeeded in their attempt to introduce economic assessment in the new agency's tasks because of the opposition of physicians and of the CEPS directed by senior civil servants (Benoit, 2016, p. 242-252).

The HAS is run by an executive body, "*le Collège*", a small body of eight persons which collegially managed this institution and jointly assumed the formulated recommendations. In 2006, a health economic academic, Lise Rochaix, was appointed as a HAS College member. She was the only woman and the only non-physician member of the *Collège,* most of them being professors of medicine. Just after her nomination she launched a working group called "Serc", for "*Service rendu à la collectivité*" ("Community helpfulness") that aimed at harmonising reflexions driven in the different HAS commissions in order to take into account collective and societal dimensions in the evaluation process. The working group also aims at enlarging "Public Health Interest" to take into account non-medical dimensions, as a part of a global Health technology assessment strategy (Robelet, Minonzio, 2015). Therefore it played an important role in the reformulation of the introduction of non-medical dimensions in health technology assessment (especially pharmaceuticals), less focused on cost-benefit than in the UK and in Germany.

Whereas government expectations towards cost-benefit assessment became more pressing, this working group appeared as an inadequate institutional response. In order to strengthen the HAS function in "medico-economic" evaluation, the budgetary Law of Social Security for 2008 established a new commission inside HAS, the

Economic Evaluation and Health Policy Commission (CEESP), chaired by Lise Rochaix. The creation of this dedicated commission results from a joint lobbying action driven by economists and the Social Security Direction of the Health and Social Affairs Department who wanted to create a “French NICE” (Benoit, 2016, p.442-445).

At the very beginning of the CEESP, some influential physicians, members of the college or members of the diverse departments of the HAS, attempted to restrict its competence area to Health policy. Despite this internal opposition, CEESP became a key actor for Health technologies and drugs assessment. External actors like the Transparency Commission and the Health Products Economic Comity (CEPS) progressively begun to take into account its expert advice in their own decision-making. The cost benefit evaluation praised by the CEESP includes the consideration of price, which constitutes a major step forward for “medico-economic evaluation”. Until then, current institutions like the Transparency Commission tended to use medical data to assess the effectiveness of drugs, without weighting it with their cost. From then on, a specific department inside the HAS was dedicated to provide new kind of information, dealing with the costs of the drugs and their and benefits for the whole population.

The development of economic evaluation guidelines and practices progressively altered the HAS internal equilibrium between the CEESP and the Transparency Commission, both involved in the drug evaluation process. At the same time, two major French institutional bodies in charge of Health policy, the Accountability Court (Cour des Comptes) and the General Inspection of Social Affairs (Inspection générale des affaires sociales – Igas), claimed for a strengthening of economic evaluation in decision-making. They also claimed for the strengthening of the regulatory status of the CEESP, which was endorsed by the Social Security Law for 2012. The CEESP became a regulatory entity like the Transparency Commission. The recommendations of each of both commissions have now the same enforceable value. This law also introduced a systematic economic evaluation for new drugs that are registered for the first time on the Health Insurance reimbursement list (like in Germany).

Economic evaluation methods and practices have been introduced by a small group of entrepreneurial experts (Robelet, Minonzio, 2015). They benefited from several

favourable organisational conditions and used organisational rules in order to create a quite autonomous jurisdiction inside the HAS. The first favourable condition is linked to the context under which the HAS has been created, as part of the 2004 health insurance reform. This independent agency was therefore supposed to participate to the control of health expenditure by expert advice submitted to decision makers. It raised the question of how healthcare costs should be taken into account in these expert advices. A need for economic expertise arose for the HAS, whose cultural background was quite exclusively medical. Secondly, the HAS's governance is conductive to organisational redesigning. Its governance consists in an executive body (*Collège)* and in different commissions specialized in one specific field of expertise, the president of each commission being a member of the *Collège*. These include a commission dedicated to fields not yet developed in the HAS like the conditions of guidelines implementation in the daily medical practices or health technology assessment. The jurisdiction of the commission was not clearly delineated and a group of entrepreneurial experts was able to take advantage of this fuzzy organisational framework.

Even if the economists seemed to have obtained "their" commission in 2008, they advanced under cover inside the HAS, anticipating the oppositions to the introduction of economic evaluation, coming particularly from physicians by the promotion of a "societal" dimension in health technology assessment. The hallmark of their action was to answer to the imperative of the evaluation of "collective outcomes" of healthcare (public health strategies as well as individual medical practices), which are not taken into account through the classical methods of medical evaluation. The members of the commission organized conferences and roundtables to raise awareness of actors inside and outside the HAS about what should be an extension of the missions of the HAS on economic assessment. The concept of "collective outcome" was vague enough to not frighten the clinicians but specific enough to justify the development of first a dedicated working group and further a dedicated department, specific methods and practices. By doing so, they progressively constructed a niche of expertise inside the HAS on the non-medical dimensions of the evaluation, including social, ethical and political dimensions. The definition of such a jurisdiction requires the expertise of other social sciences like sociology, philosophy, political science or geography, which were progressively introduced in

the CEESP. They gained autonomy inside the HAS, especially from the other commissions (run by clinicians) and from the departments dealing with the production of medical guidelines. The CEESP also launched a coalition with some members of the College (first of all with the President of the HAS), reassured that the economic evaluation will not lead to barriers in access to care. The college was very keen to preserve the reputation of the HAS to protect the population from bad medical practices or products and from health inequalities.

These experts build a discursive coalition with actors and institutions outside the agency (health economic academics, representatives of the ministry of Health and of the national health insurance organization), launching exchanges of resources with them. They gained their support by involving them in the debates on the definition of the content of non-medical dimensions of evaluation. These actors were also invited to attend the meetings of the commission. These exchanges were also means to obtain information on the strategies and resources of these actors in the decision process. This objective alliance helps to encode in the law the concepts and practices of economic evaluation defined by this group of entrepreneurial experts, who was more successful than his German counterparts facing a stronger coalition of opponents at different levels: at the political level (opposition between political parties), at the policy level (opposition of the medical profession) and at the expertise level (opposition of academic health economists).

4. Conclusion

The notion of translation is also a way to tackle the issue of policy convergence. The dominant literature on policy convergence is, like the one on policy diffusion and transfer, focused on the identification of convergence mechanisms (Holzinger, Knill, 2005), which are close to diffusion or transfer mechanisms: imposition, competition, transnational communication, harmonisation and independent problem solving. If these mechanisms explain rather well the convergence processes, they are less successful in explaining the limits of convergence. Authors like Levi-Faur and Jordana (2005), who have taken this issue into account, focus more on the contradictions of these processes using the notion of “convergent divergence” and on their unexpected effects (“policy irritants”). However they do not directly address the

question of the explanation of the limits of convergence, which is a key dimension of the policy translation framework. Furthermore it is also a contribution to the analysis of policy change and its limits.

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