Working Paper

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National Coordination of EU Policy

Is Poland following the French Path?

Contents

ABSTRACT

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National systems for the coordination of EU policy are strategic, especially for the preparation of negotiations. This article compares the French SGAE, a well-established, highly centralised system, and the Polish system, UKIE, a recent one, which does however share common features with the SGCI. The paper explores how and why Poland is adopting a system close to the French one, since its choice of organisation can influence the effectiveness of its interest[s] representation. Moreover this comparison also provides an opportunity to observe a possible convergence between national administrations in the EU.

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I. INTRODUCTION

National structures for the coordination of European policy play a strategic role in the formulation of a Member State's interests and positions regarding the process of European negotiations. Structures like the French SGAE (Secrétariat Général aux Affaires Européennes[2]) coordinate the actions of ministries in European affairs, define French priorities, transmit information and instructions to the permanent Representation in Brussels and ensure that the Parliament is informed. Therefore, the national organisation of structures dealing with EU-related issues can impact the ability of a country to represent and defend its positions at a European level. Countries like Great Britain, Germany or France have developed their own strategic organisational models to adapt national systems to the challenges of European integration. A set of demands and pressures confronting them can indeed be identified, such as the necessity to ensure that policy outcomes are congruent with national preferences, the rigorous demands of the six-month presidency of the Council of the EU, tactical preparation for the Intergovernmental Conferences, the protection of national interest with respect to issues that have a high salience on the national agenda, etc. However, if all member States are confronted with this pressure and therefore need to coordinate policy, they have chosen different solutions. There is a difference in the degree of importance accorded to this objective (Kassim/Peters/Wright 2000).

This institutional challenge is also relevant for the new Member States: already before the enlargement, national governments found themselves under pressure to adapt administrative and political structures to fulfil EU requirements.

In this regard, it is interesting to look at the way new member countries have created national co-ordination structures, and how much they converge or differ from equivalent structures in 'old Europe', and if their approaches efficiently cope with European issues. This analysis may indicate whether these countries are going to be 'full players', 'sub-standard' or 'failed players' (Lippert/Umbach: 2005). Therefore, comparing national systems of co-ordination in France and Poland can bring new elements concerning administrative convergence in the EU. UKIE (Urząd Komitetu Integracja Europejskiej/ Office of the Committee for European Integration) was founded in 1996 partly on the model of the French SGAE, since Poland was under EU pressure to have a steady interlocutor and most of all to tackle all issues linked to membership preparation. The creation of an entity distinct from the Ministry of Foreign Affairs (MFA) indicates that it is proceeding in the same direction as the French SGAE, and this development should be situated in the context of exchanges at the level of

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[2] Former SGCI: Secrétariat Général du Comité Interministériel pour les questions de Coopération Economique Européenne

experts and civil servants between France and Poland (TWINNING and TAIEX). This also raises the controversial question of how extensively the EU-related administration system of a Member State can be transposed to another. Comparing both systems should help us to bring a qualified answer to the question of whether Poland has reached a "hierarchical coordination[3]" (Nizard 1976: 216).This is not to say the French model is the way: it is just one of them and it has its limits. "The question of effectiveness- what it means in an EU context and whether there is a recipe for success in the form of a particular national strategy- though undoubtedly an important concern- is extremely problematic" (Kassim/ Peters/ Wright 2000: 254).

Indeed, the growing importance of the EU, the interactions with Brussels and the need for well co-ordinated policy positions are common stimuli for the member countries, so that convergence in the administration of EU affairs can be expected. New EU Member States have been 'Europeanized', as evidenced by a shift of attention and resources (Wessels/Maurer/Mittags: 2003). The Polish administration has not escaped the phenomenon, and one might expect it increasingly to resemble West European systems- especially the French one because it chose to follow a similar path. However, there is a great diversity in this phenomenon: countries react in diverse ways and national distinctiveness persists. The EU-15 had no unique model to offer, and the EU has put no pressure on the CEE countries to adopt a particular system. Therefore, the inspiration these countries could have found among EU-15 systems was more often described as a 'pick-and-choose approach' (Lippert/Umbach 2005).

Part II will be dedicated to the linked development of these structures. Then, the main aspect of their organisations (III) and place in the institutional system (IV) will be analysed based on the literature on this topic and recent discussions with Polish senior officials. The partial convergence between both can be explained through different factors (V). Finally, Poland is likely to reinforce its coordination system in the future (VI).

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[3]   This means the transfer of all or part of the power from the multiple decision centres among which it was shared, to only one of them, whose pre-eminence is thus established.

II. DEVELOPMENT OF THE COORDINATION SYSTEMS IN FRANCE AND POLAND: TWO CONNECTED STORIES

There is no one single model of EU administration (Wessels: 2002). Generally, three main European models of public administration can be distinguished: the Prussian-German one, the French one and the British one (Lippert/Umbach 2005). The models for EU-related coordination are part of these traditions. Two dimensions can help in characterising them: "the degree of functional decentralisation and horizontal coordination within a government, in particular between ministries. Horizontal coordination is defined in qualitative terms by a hierarchy that is to be measured by existing 'chains of command' (subordination, etc.) To the contrary, functional decentralisation is defined in quantitative terms by focusing on a proliferation of actors and can be measured by the involvement of ministries, departments, agencies and at an intra-ministerial dimension" (Maurer/ Mittags/ Wessels 2003). This way, the EU-related system in Germany is characterised by a low degree of horizontal coordination but a high level of functional decentralisation: we have here a pluralist fragmented type without a single centre of decision-making, which reflects the degree of decentralisation of the country itself. Regional ministers can participate in the Council of Minister's decision making and their positions sometimes are "not free of contradictions" in Brussels (Maurer/Mittags/Wessels 2003:424). Moreover, the German constitution guarantees the autonomy of each minister towards the *Kanzler*. These features never made it possible to establish a structure similar to the SGAE or the British European Secretariat. France and UK are, by contrast, centralised types with a strong "hierarchy based on a central agency which is permanently supported by political leadership." (Maurer/Mittags/Wessels 2003:427) Politicians of national governments have a strong grasp of EU affairs and EU related bureaucracy is directly linked to the government (SGAE in France). In the UK, the creation in 1973 of a "European Secretariat" in the Cabinet Office had been preceded by missions to study the SGAE system (Lequesne 1993). This choice is logical: the same tendency towards political-administrative centralisation around the Prime minister existed in France as well as in the United-Kingdom. However, the British system is less formalised and is organised somewhat differently; its main difference with the French system is to be seen in the involvement of the parliament and in the lobby culture. Both systems have a reputation for administrative efficiency, and "there is little question that France has suffered less from the appearance of contradictory national positions within the Council than have some of its partners" (Menon 2000: 85).

These models of the EU-related system in the EU can be a source of inspiration for new entrants in the EU. The French and the Polish systems

developed in very different circumstances, but they are however linked.

On the one hand, the French SGAE is rooted in an old tradition of centralisation and inter-ministerial coordination. It was created after World War II, and is therefore shaped by the political and administrative traditions of the IVth and the Vth Republics. It was originally set up in the context of the Marshall Plan as France had to enter the OECE. It was necessary for Paris to decide which ministry would coordinate the positions of the French delegation. The government of Robert Schumann eventually found a compromise which would favour no one particular ministry. The preparation of the French positions was given to an interministerial committee for European economic cooperation, directly dependent on the President of the Council. A permanent secretariat was established to assist this committee, whose task was to prepare deliberations and decisions related to the concerned administrations and to watch over their execution. It is one of the first French 'administrations de mission', which are horizontal structures created to deal with a specific problem. The SGAE developed over time, always supporting a stricter interministerial coordination. Its influence diminished temporarily with the arrival of the leftist government at the beginning of the 1980s. (Lequesne 1993).

On the contrary, UKIE is a very young structure, whose creation in the context of the negotiations and preparation for membership in the 1990s is part of the 'Europeanization' of Poland. . It was in the middle of the 1990s, as the development of administrative capacities in candidate countries became crucial that KIE, the Committee for European Integration, and UKIE, its office, were created, forming "the leading coordination structure" in Poland (Lippert/Umbach 2005: 125). KIE was established by Polish law on 8 August 1996. According to the Polish law of the 8th of August 1996, article 1, it is "a supreme governmental administration body competent for programming and coordination of policy relating to Poland's integration with the EU, programming and coordination of Poland's actions adjusting Poland to European standards as well as for coordination of state administration actions in the field of foreign assistance obtained." It unites the ministers for Foreign Affairs, Home Affairs, Finances, Economy, Labour and Social, Agriculture and Justice. The creation of UKIE to assist KIE distinguished Poland from other candidates since it was bigger and had broader tasks than other EU decision making systems (Lippert /Umbach 2005). Later on, KERM was created, the European Integration Committee of the Council of Ministers, in order to facilitate the work of KIE and the decision making system.

Through the creation of these entities, Poland gave itself means to deal with EU issues and meet the EU's expectation to see structures set up in the candidate countries which could act as an interface in the country, deal with PHARE funds, and be responsible for implementation. By creating an entity separate from the ministries for coordination of positions and implementation, Poland chose to go in the French direction. This is no coincidence: administrative exchanges between France and

Poland have been particularly intense in the last decade. For example, twinning was an important instrument for preparing accession: EU Member States gave the candidates access to a 'market of possibilities' concerning administrative systems inside the Union, and proposed a selection of different administrative models. France has had the most twinning partnerships with Poland, second only to Germany, and followed by UK, Spain and the Netherlands (Lippert/Umbach 2005). The French minister of Foreign Affairs even indicates on its website that France had the most PHARE partnerships between 1998 and 2002 (44 twinning partnerships in the period and among them, 32 as leader country, which meant that France participated in one third of partnerships). It is worth noting that France has been intervening beyond its traditional domains, especially in technical areas. The ministry of Agriculture has been particularly involved. Is this involvement a French strategy to gain influence in Eastern Europe? According to C. Cornuau (Egide 2000), advisor to the European Commission for administrative cooperation with the candidate countries, the partnership system is a very interesting opportunity for the Member States to reinforce their influence in new countries. The vote of the new entrants at the Council could be influenced by the countries which helped them in. The other interest of these partnerships is to prepare the ground for enterprises to take place in CEE countries. Moreover, it is also especially important for France in an enlarged Union to try to compensate its loss of influence and one way to do it is to create links, as upstream in the process as possible with new partners, whose support is necessary in an enlarged Union. The French administration is aware of this, despite the fact that it costs time and that others might not systematically accept French ideas (Deloche 1998).

On the Polish side, there seems to be a certain attraction towards the French system. Indeed, there might be different reasons for choosing one or the other model, or at least leaning in one or the other direction. Traditional zones of influence are not necessarily the determining choice, as CEE countries often choose Spain as a model, a young democracy stemming from dictatorship. However, an advantage for France, in comparison with Germany, is that it is not a federal state. Moreover, according to the Commission (Egide 2000), French experts have the advantage that public administration is their domain of predilection, whereas the UK and Scandinavian experts are disadvantaged by the system since they have reduced their public administrations, so that their system is not as 'plethoric' as the French one.

These factors can explain why Poland chose to follow the French path; the system of a pre-eminent central state with a strong Prime minister assisted by a structure for coordination seemed to be taken up by Poland with the creation of UKIE.

It was allegedly under the impulse of Jacek Saryusz-Wolski, currently member of the Committee for European Integration (KIE), that the decision was taken to adopt a system close to the French one. He was government plenipotentiary for European Integration and Foreign

Assistance, chief negotiator of the Association Agreement between Poland and the European Communities and chairman of the Poland-EU Association Committee between 1991 and 1996. The creation of KIE and UKIE in 1996 gave him the opportunity to implement his ideas. It is worth noting that J.Saryusz-Wolski completed postgraduate European studies at the University in Nancy and obtained scholarships at the Institute of Political Sciences in Paris and at the Universities of Lyon and Grenoble in France (UKIE 2005). Indeed, studies abroad and exchanges between Polish and French civil servants have created an exchange of information regarding their different systems, making Polish civil servants especially well aware of the specificities of the French model. Some civil servants of UKIE have studied at the ENA, others had training formation there or studied in France. The fact that they had this opportunity reflects an attention to the French system that developed in the 90's, partially explaining the direction taken. Interviews with Polish senior officials reflect different attitudes regarding the relationship between the SGAE and the creation of UKIE, sometimes insisting on a consensus about the French system as a good example to follow, sometimes maintaining distance from it, insisting that the idea is not about copying a model but looking for instruments. For example, the KSAP, the school for national administration was an important element picked up from the French ENA and has a similar function.

Even if one believes that the intention is not to imitate the French system, should it be considered a 'pick-and-choose approach'? It is not that a few superficial elements have been picked up and transposed onto the Polish system; rather it is the adaptation of the global idea concerning the design of the system and the necessity of a centralising structure independent from ministries. The need for such a structure appeared in the 90s, as ministries were becoming very autonomous and had to be involved quickly in European issues.

Finally, observe that this choice is still controversial. There are often discussions about the opportunity to change the current organisation, abolish UKIE and distribute its task among the ministries. The debate about its existence appears from time to time in newspapers, creating an uncomfortable situation for UKIE civil servants. This is a big contrast with the SGAE, rooted as it is in a long tradition and whose existence is not at all in question.

III. ORGANISATIONAL FEATURES: THE DIFFERENTIAL DEVELOPMENT OF A COMMON WILL TO CENTRALISE

The will to centralise and coordinate is at the heart of preoccupation in both cases, even if it is not to the same extent. The tasks assigned to these structures, their internal and external organisations and the features of inter-ministerial coordination reflect it.

First, the central task of the SGAE is to enable France to 'speak with one voice'. A Prime ministerial circular puts it this way: "French positions in all the institutions of the EU must be expressed with clarity and the greatest possible coherence... the unity of the French positions is a necessary condition of the efficiency of our action... [the] requirement of coherence in the French positions imposes the need for a strict respect of the procedures for inter-ministerial consultation" (Menon 2000: 79). This unity in the expression of the French positions has proved to be effective. However, one can argue there is a wide discrepancy between these ambitions and the difficulties faced in achieving effective coordination (Menon 2000: 235). In order to ensure this unity of speech, great care is given to the preparation of instructions, but also to the diffusion of information to ministries and to the national Parliament. Importance is attached to the SGAE's role as a link with the Permanent Representation in Brussels and to the dispersal of information amongst French MEPs about the French position. SGAE also has to provide expertise on European issues and reinforce the French presence in Brussels. However the implementation side has long been underdeveloped. SGAE showed little interest towards the implementation of European measures during the 60's and 70's, since the French political-administrative culture favoured the preparation of negotiations, seen as "noble", and largely ignored the more mundane execution of decisions (Lequesne: 1993). A greater awareness of the necessity of an increased control of implementation developed at the end of the 80s. Formulation and implementation started to be considered as linked and SGAE exerted an administrative coordination in both cases. Today, the SGAE is in charge of making ministries aware of internal legislative and legal consequences of EU law proposals, monitoring transposition delays and taking part in controlling the use of funds France receives. This way, it diminishes the risks of having proposals adopted whose transposition into internal law would be too difficult (Sauron 2000).

UKIE tasks do not reflect the same degree of importance given to unity of speech. They include "the adoption and implementation of the EU acquis and the control of legal approximation. Furthermore the committee was in charge of the management and distribution of foreign aid, strategic planning and evaluation as well as the EU related public information campaign" (Lippert/Umbach 2005: 125). So it seems that UKIE has

broader tasks than SGAE does since it constitutes an extension of structures aimed at making Poland able to enter the EU. These structures include the government plenipotentiary for European integration and foreign assistance (91-96), whose task "emanated mainly from managing the PHARE programme but also comprised "initiating, organising and coordinating measures related to the process of adaptation and integration with the EU" (Lippert/Umbach 2005: 121). Therefore it focuses especially on implementation. So UKIE is in charge of a broad range of tasks, which makes it special in CEE countries: "the UKIE stood out in terms of (...) assigned competences" (Lippert/Umbach 2005: 125), but also compared to the SGAE.

Secondly, the internal organisation of the SGAE reflects the will to have a small, flexible structure able to concentrate information and coordinate policies. Since its creation, SGAE has been organised in sectors, which does not mean however that each of them corresponds to a ministry (Lequesne 1993). Each sector is indeed in charge of several policies and is supposed to communicate with several ministries. Then, as an administration "d'état-major" (political relay), the SGAE has a deliberately limited amount of employees, in order to ensure the flexibility of the organ. It has today 200 agents stemming from different administrations, which is as we will see much less than UKIE. The Secretary General, his two deputies and the chiefs of sectors come from the main ministries and the "grands corps de l'Etat". Other employees mostly come from the economic and finance ministries. Moreover, the post of secretary general could be given to any high civil servant in the Council of Ministers from 1977. A very important element of the system is that secretaries general have been in most cases since this date political advisors to the Prime Minister or President. This situation has reinforced a lot of the legitimacy and the authority of the SGAE amongst the ministries, making it a real interface between the administrative and political spheres.

On the Polish side, departments are less numerous, and they are mainly organised not according to policy areas but rather according to missions, which again underlines that the focus is less on policy formulation and more on implementation. Concerning the staff, UKIE, with 500 employees, is much larger than SGAE, which only has 200. "UKIE stood out in terms of the number of employed staff" (Lippert/Umbach 2005: 125). It was also stated that it works better since there are more employees. UKIE is currently chaired by Minister Jaroslaw Pietras, who is simultaneously Secretary of State, Secretary of the Committee for European Integration (KIE), and deputy chairman of the European Committee of the Council of ministers (KERM). This triple function ensures the link with KIE and with KERM, but unlike France, there is no similar proximity to the Prime minister. Furthermore, he is assisted by three Undersecretaries of State and the Director General of the Office of the Committee for European Integration.

Thirdly, the effectiveness of EU-related coordination in France is notably due to the interactive work between the following actors: the Prime

minister and his adviser for European Affairs – who is also general secretary of SGAE - , the minister for European Affairs or delegated minister, being de facto part of the MFA, and the SGAE civil servants, the latter ones bringing their expertise and competence to answer the demands of the first ones. The fact that SGAE is placed under the authority of the Prime minister is a central feature of the French coordination system, distinguishing it from most other organisation types where the MFA has authority over coordination (Lequesne 1993). The other strategic relationship is the dialogue between the SGAE and the Permanent Relation in Brussels, which is absolutely crucial for centralisation and coordination. The system balance was different between 1981 and 1984, as the SGAE was placed under the new ministry for European Affairs, an experiment which did not last. Apart from this period, SGAE has known quite a steady place in the 'power triangle' and its effectiveness has been reinforced by the attention Prime ministers and Presidents have given to European affairs since the beginning (Sauron 2000).

UKIE has known several organisation models -the pre-2001 model, the 2001-2004 model, and the current one - which have given it more or less different degrees of importance in relation to the other actors of European integration in Poland: . This can be seen as reflecting tensions about the roles of the three main actors of European Integration: the Prime minister, the foreign minister and the plenipotentiary for European Integration and foreign assistance, which was replaced in 1996 by KIE and UKIE. Until 2001, the Polish EU decision making system was characterised by the strong coordinating role of the Prime minister and his increasing role as a key person concerning European integration. Prime minister Buzek started to chair KIE, with the foreign minister as his deputy. The importance of UKIE increased during the period, becoming "a quasi-ministry"(Lippert/Umbach 2005: 122). It was headed by a state secretary appointed by the Prime minister. After the general elections in 2001, Leszek Miller became Prime minister and engaged in a reform of the system so that the Polish EU decision-making system would shift more towards the Foreign ministry. The negotiation department was transferred from the Prime minister's office to the MFA as well as some units in the UKIE dealing with the negotiation process. The UKIE remained the main unit responsible for the coordination of foreign assistance and the Prime minister continued to be the chairman of KIE, although the question was raised of closing it down and spreading its responsibilities among line ministries. It can be understood to bring transparency to the distribution of competences between the two structures. It is however questionable whether this situation was really beneficial, since more weight for the MFA could make it more difficult to reach agreements, because the MFA is still a ministry and therefore 'judge and jury' and unable to act as an impartial arbiter. It is interesting to see that it has not engendered the feeling of a real change among civil servants. Further integration between UKIE and the MFA could have happened, according to the main research-ers of EU-related Polish administration. However, this can finally be seen as

a practical adaptation to the demands of accession negotiations: it was just most convenient for the period to have the MFA playing a leading role.

However, the system of the European Secretariat ended in 2004; the current system is closer to its pre-2001 predecessor since it is still under the 1996 law. UKIE is back under the authority of the Prime minister: it is chaired by Marek Belka. Minister Pietras, who is at the same time secretary of KIE, deputy chairman of KERM and chairman of UKIE, plays a linking role.

Here, there is an important difference between the two systems. The SGAE has reached a balance between poles of EU integration and its competences are not really put into question. The situation is different for UKIE which has to find its place between moving power poles.

Furthermore, steps of inter-ministerial coordination in France also reflect this will to centralise and coordinate. Firstly, all proposals and official correspondence addressed by the Commission to the French government go through the Permanent Representation which sends it to the SGAE. Once at the SGAE, the propositions are dispatched in the different sectors which send them to the competent ministries. When a ministry has reacted to the proposal of the Commission, it has to transmit its written observations to the competent chief of sector of the SGAE, for a so-called "étude d'impact juridique" (legal assessment). The chief of sector evaluates the legal consequences, issues an opinion on the text and compares national and community disposals in a span of one month. Meetings at the SGAE are essentially *ad hoc*: they aim at examining a specific dossier from the council agenda. Starting from the positions they express, the chief of sector tries to find a minimal consensus which will be the base for the French inter-ministerial position. Most of the meetings end with an agreement. An important feature of coordination is that the French delegation expresses itself during the entire process based on French instructions defined in the inter-ministerial coordination in SGAE: at the working group, at COREPER, at the Council (Sauron 2000). However, this would have to be qualified. "In France, the SGAE may be the central actor, but its monopoly is not absolute. In matters concerning the CFSP, monetary policy, and the CAP, the ministries for foreign affairs, finance and agriculture have their own lines of communication and expertise and can act with considerable autonomy" (Kassim/ Peters/ Wright 2000: 248). Moreover, all cabinets and ministry services do not necessarily inform the SGAE about exchanges they have had with the Commission- SGAE is deemed to concentrate too much on the formulation of positions for the Council and does not coordinate that much upstream (Lequesne 1993).

The coordination process in Poland looks quite similar to the French one: It is the department of coordination at UKIE which receives the new pieces of legislation sent by the secretary general of the council. The department of coordination sends it to the ministry/ies responsible, with a letter asking them for their positions. Every new piece of legislation is also sent electronically to the Parliament. The minister has two weeks to produce an assessment (which seems to be the equivalent of the French

"étude d impact juridique") about the economic, financial and social consequences that the legislation would have in Poland. The position of this draft is sent to ministries and discussed in KERM (European integration committee of the Council of ministers) on the last day before the two week deadline. On the same day, KERM also discusses the position sent by Parliament. However, not everything goes through UKIE: ministries are in direct contact with the permanent representation concerning mono-sectoral issues and also concerning instructions for working groups. According to Polish senior officials, ministries have here a certain autonomy, especially the MFA which is also the chief of the permanent representation. Concerning the preparation of COREPER I, the routine is the following: the department of coordination receives the agenda on Friday, sends it to ministries who reply by Monday, instructions are prepared and discussed on Tuesday (meeting of the directors of European integration departments, followed by meeting of KERM), then sent to the mission in Brussels. Instructions for COREPER II are prepared by the MFA according to a similar procedure. So the general process looks quite similar concerning for example the way ministries are involved with impact assessment. However, the law proposal does not travel in UKIE through the sectors and then to the ministries, rather only to the European Integration policy department and then direct to the ministries. This means that at this stage only one department is involved at UKIE while at SGAE all the 'sectors' are involved- perhaps meaning that the SGAE has a more detailed expertise in relation to the ministries and is therefore able to exert more pressure on them. SGAE has a more global control over the preparation of instructions and the centralisation of information. Coordination at UKIE does not reach the same extent.

Finally, general features of the coordination culture in both countries are also interesting to compare. Although 'sectorization' is powerful in France (Menon: 2000), different factors contribute to facilitate inter-ministerial coordination. First, administrative coordination has traditionally been subordinate to governmental coordination since the IVth Republic and the first 'comités interministériels'. Then, there is the weight of the French political-administrative culture on behaviour: generally, French ministers obey inter-ministerial demands, because the French political-administrative culture has conditioned them to accept the Prime minister's decision given on a vertical/hierarchical mode (Lequesne 1993). This can even create a tendency to resolve problems through conflict by having the Prime minister finally decide. However, the submission to the Prime minister does not mean ministers always act in a collegial way. They can try to favour the logic of their sector in an EU negotiation, forgetting about inter-ministerial demands. It happened this way that two contradictory positions were expressed by French representatives in two different council formations, but the problem happens less often than in other countries, notably Germany (Lequesne 1993). Moreover, "France's system of coordination reflects its statist and impositional policy style. Interest groups remain policy outsiders, at least until the implementation stage,

and lobbying by private interests is regarded as barely legitimate by state officials" (Kassim/ Peters/ Wright 2000: 250). Finally, coordination is also affected by the traditional primacy accorded to the preparation of negotiations over the implementation (Lequesne 1993: 48).

The context of post-communist countries is of course particular, although communist legacies should not be overestimated. The fact that the government and the public administration used to be perceived as controlled by the communist party can somehow impact coordination. Beyond this, considerations about the hierarchy in Polish public administration are maybe more relevant. Especially in Poland, the particularly strong hierarchy in public administration makes inter- and intraministerial coordination difficult and the readiness to take up responsibilities and make its own decisions is very underdeveloped at the middle of the hierarchical ladder (Lippert/Umbach: 2005). Moreover, UKIE is now under the authority of the Prime minister; yet the Prime minister is comparatively weak and was essentially 'primus inter pares' before 1997 (Zubek: 2001). He has reinforced its prerogatives since the 1997 constitution, but there is not the same tradition of coordination under his authority that there is in France. According to Polish senior officials, because of the Polish tradition, administrative culture and political situation, UKIE is not as powerful as SGAE. A slightly stronger position can however emerge *de facto* of the deputy chairman of KERM and secretary of KIE's position as head of UKIE. This gives UKIE civil servants a knowledge of what is happening during the meetings. UKIE is however not in a position to decide in cases of conflict; rather it has to play a mediator role, trying to find solutions so that issues will not have to be discussed at a ministerial level. Hence, the power of UKIE is very informal. Contrary to the SGAE, situated above the ministries, UKIE is equal to them, enjoying, according to the words of a Polish senior official, a position of 'primus inter pares'.

IV. PLACE IN THE INSTITUTIONAL SYSTEM: AN 'INESCAPABLE' SGAE VS UKIE AS 'PRIMUS INTER PARES'

The contrast between a coordination structure that cannot be circumvented and one acting more as a 'primus inter pares' is particularly visible in the structures' relations to other national actors of European integration such as the Prime minister, the MFA and the Permanent Representation in Brussels.

The role of the Prime minister office is central for the SGAE and as already mentioned the direct link between him and the SGAE is established through the nomination as the head of the SGAE of one of his closest advisers. This direct proximity to the political power explains why agreements are reached in most cases. Actually, the positions of the Prime minister's cabinet have influenced upstream the positions that SGAE defends in discussions (Sauron 2000). While the President plays an important role in giving impulses and providing direction for European issues, the Prime minister is the authority for inter-ministerial coordination.

The question of the role of the Prime minister in Poland is to be seen in the perspective of the numerous changes characterizing the Polish political system in the 90s. It has evolved from a presidential regime under the 1952 constitution through semi –presidentialism under the 1992 interim constitution to a Parliamentary system with some elements of semi-presidentialism under the current 1997 constitution. The Polish executive has overcome communist legacies "but its capacity to shape policy remains checked by significant systemic, political and organizational constraints" like the domination of supporting parties of the government, the limited political and organizational resources available to the Chancellery and the weakly developed instruments for coordination (Zubek 2001 : 914). Contrary to the French case, in Poland the Prime minister is not directly involved in the resolution of inter-ministerial conflicts: committees were set up to take up unresolved dossiers at a UKIE level. KIE was created in 1996 to enable meetings of the Prime minister with ministries related to European affairs. It used to meet quite often and took the most important decisions concerning the preparation of Polish membership. It was more a forum of discussion than of decision because decisions always had to be adopted by the Council of ministers. With the intensification of Polish relations with the EU, especially with the accession negotiations, this committee was considered too formal and not technical enough: that is why KERM was set up as a forum where undersecretaries of state responsible for European affairs meet twice a week and discussed very technical issues. KIE only meets every four months to discuss horizontal issues (strategy concerning financial negotiations,

Lisbon strategy). In this manner, KERM has a double function: it works as a forum for discussion and adoption of the Polish positions on European issues, and it reconciles differences of view and inter-ministerial conflicts. If the ministries cannot find a common position, KERM forwards the draft document to the Council of ministers, which makes the final decision.

Coordination with the MFA is important for the delimitation of powers of inter-ministerial coordination structures. In most other countries, it is the MFA which deals primarily with EU issues since it enjoys a horizontal view on EU issues. However, this can be problematic: the MFA is still a ministry with sectoral interest and can enhance rivalries, being at the same time judge and jury. The French MFA benefits from a traditional competency over external relations (Menon 2000). Generally, instructions to the Permanent Representation can only be sent via the SGAE, even when coordination is not necessary. The sole exception to this is the CFSP, for which the Coreu telegram system, based within the Ministry, is utilized. However, the independence of the 'Quai d'Orsay' is limited. The MFA must consult the competent ministries when the implementation of a common action implies the adoption of national measures of a financial character. Furthermore, when common actions call upon community instruments or policies, it is up to the SGAE to assure inter-ministerial coordination. The French system is also characterised by the creation of a Ministry of European Affairs, established in 1981. Its role was first limited to following questions related to the application of EC Treaties and while it did not have its own office, it had the SGAE under its authority till 1984, which was perceived as a control of inter-ministerial coordination by the MFA. This system ended in 1984. The role of the Minister – generally delegated Minister- for European Affairs has been a subordinate of the MFA, lacking its own offices and personnel. To sum up, the MFA and the Ministry for European Affairs generally have a less corporatist discourse than other ministries and show a rather global approach to European affairs. Their horizontal perception gives them a specific legitimacy. They however do not coordinate, at a national level, formulation and implementation of community policies: this activity belongs to the SGAE (Lequesne 1993).

In Poland, the degree of autonomy of UKIE towards the MFA has varied over time. Under the system of the European Secretariat (2001-2004), UKIE depended on the MFA which itself depended on the Prime minister: therefore, Danuta Hubner was head of UKIE, State Secretary at the MFA and subordinate to the Prime minister. Even if UKIE formally depended on the MFA, they seemed to have worked in a cooperative rather than authoritative mode, and this cooperation remained after both were formally separated again. According to Polish senior officials, the role of the MFA had simply been enhanced during this period in order for it to manage the accession negotiations, and this is not to be seen as the result of rivalries in the 'power triangle'. Now that Poland is in the EU, UKIE is back under the authority of the Prime minister, its 'regular modus operandi'. Secondly, the division of competences between UKIE and MFA leaves more room to the latter than in the French system. Before accession,

UKIE was in charge of internal coordination and the MFA of external issues. With the accession, the separation of internal and external became blurred because UKIE also started dealing with 'external' tasks. The difference today is that the MFA is in charge of the great political questions, bilateral relations, defence, and common and foreign security policy. They prepare instructions for external relations for the Council as well as instructions for COREPER II and they also have a role in international negotiations. Therefore, the formulation of the CFSP escapes both SGAE and UKIE, since both MFAs can send their instructions directly to the Representation, but the Polish MFA has a stronger position in the "power triangle" and more weight in the preparation of instructions.

Coordination between SGAE and the Permanent Representation in Brussels is very important. The whole French organisation relies on this close dialog between the two places to centralise administrative activities: the SGAE in Paris and the PR in Brussels. The underlying idea is the following: because of the high number of actors with diverse interests involved in European integration, one has to focus the decision making on a limited number of civil servants. The SGAE and the French Permanent Representation have indeed a limited number of civil servants. Through all the negotiation stages, everything is based on what has been decided at SGAE. The French delegation always expresses itself on the basis of the SGAE instructions through working groups, COREPER, Council (Sauron: 2000).

This is one of the main differences with the Polish system. The Permanent Representation also sends the legislative proposals to UKIE which distributes them to ministries, and a similar dialogue takes place between UKIE and the PR. The essential difference is that not all the information has to go through UKIE. In France, even when no inter-ministerial coordination is needed, the information has to go through SGAE, except for the formulation of CFSP. In Poland, ministries are in direct contact with the permanent representation and can transmit directly their instructions for mono-sectoral issues. It is said to be faster and all positions are also sent to the UKIE and the MFA. According to the French view this would be a handicap: Sauron warns about the danger of ministries acting by themselves, since this renders them susceptible to harming the effectiveness of the national positions at a European level (Sauron 2000). Moreover, the MFA also directly sends its instructions to the Permanent Representation for COREPER II. The procedure it follows is similar to UKIE, sending instructions first to the concerned ministries for approval and then to the representation. So France and Poland share the same concern about their civil servants receiving instructions, but UKIE does not control them to the same extent.

V. COMMON IDEAS, DIFFERENT ACHIEVEMENTS: EXPLANATORY FACTORS FOR A PARTIAL CONVERGENCE

The following common features have been highlighted in this comparison of UKIE and SGAE: first, both are specific structures charged with coordination, and their development corresponded to a need for inter-ministerial coordination in European issues. In France it was to find a neutral actor other than the MFA or the Ministry of Economy that was able to deal with the Marshall Plan funds. In Poland, according to Polish senior officials, the creation of UKIE became necessary in the 1990's, as ministries were getting too autonomous and a way had to be found to get them more involved in European issues. SGAE and UKIE both deal with coordination for creation and implementation of EU law. Thus, UKIE and SGAE are supposed to offer horizontal knowledge and expertise and arbitrate conflicts independently. Secondly, they are placed under the authority of the Prime minister. This distinguishes them from most other systems of coordination in the EU, the majority of which are indeed centred on the MFA. Both have however experienced this situation: the SGAE was placed under the authority of the Ministry for European Affairs between 1981 and 1984, UKIE between 2001 and 2004. Finally, they share a common concern for national civil servants receiving their instructions and being able to defend the national positions. It is maybe not to the same extent, but the Polish administration seemed to have prepared it consciously before membership. They also both inform national MEPs.

Five main factors can be used to explain the convergence of national EU coordination administrations: the dominant pressure resulting from the institutional structure of the EU, the phenomenon of mimicry or learning, coercion, socialization, and assumption of optimization (Kassim/Peters/Wright 2000). The first two are the most relevant here. Poland and France both "confront processes and procedures at the European level that determine in which forum and under which decision rules, in what sequence and by which actors business is to be transacted" (Kassim/ Peters/ Wright 2000: 241). Moreover, France has been willing to diffuse its administrative experience eastwards, and Poland has been willing to learn from it. "New entrants have typically prepared for accession by examining how structures and procedures operate in existing Member States". Then, the assumption of optimization may have played a role in the choice to adopt a coordination structure close to the French one. The role of coercion and socialization are here less evident but can be seen as part of the Europeanization process.

However, UKIE cannot and does not simply replicate the French model. There are differences in the following points: first of all, UKIE being a relatively new set up does not rely on the same tradition and authority as

the SGAE. Second, UKIE has been assigned broader tasks and has more personnel to achieve them. This is to be seen in the context of Poland's accession to the EU. UKIE's power is also more informal than that of the SGAE and its relation to ministries can be described as 'primus inter pares'. Like in France, UKIE is now under the authority of the Prime minister. However, this was not the case between 2001 and 2004. Furthermore, the Prime minister has no direct link to UKIE, the only formal one is to the chairman of KIE, but as we saw KIE has no frequent activities. This is also reinforced by the fact that the Polish core executive is less stable than the French one. "The central leadership was often contested and led to a high level of confusion"(Lippert/Umbach 2005: 121). Finally, UKIE does not exert coordination to the same extent as France. Its relationship to the Permanent Representation is not exclusive, whereas the relationship between the SGAE and the French PR is absolutely central. Ministries and especially the MFA can send instructions themselves, and the latter has more weight than in the French system. Differences however have to be qualified and "care should be taken not to overestimate the extent to which the coordination of EU policy is centralised" (Kassim/ Peters/ Wright 2000: 249). The monopoly of SGAE on EU-related coordination is indeed not absolute.

In this sense, the 'coordination hiérarchisée' has not been reached to the same extent. Besides, whereas France is characterised by a high horizontal coordination and a low functional decentralisation (Maurer/Mittag/Wessels 2003), Poland also aims to establish a high horizontal coordination but has a higher functional decentralisation.

Again, the factors developed by Kassim/Peters/Wright to explain differences can be used here. They are as follows: the national policy style, policy ambitions, conceptions of coordination, the political opportunity structure, and the administrative opportunity structure.

First, if France's policy style can be called 'statist' and 'impositional', policy making is more segmented in Poland. Second, policy ambitions also differ a bit. Still according to these authors, under the globalising system of coordination established by France, there is a will to preserve national sovereignty. In terms of policy ambitions, Poland cannot emphasize that since the priority has been to fulfil its commitments for membership. This could however evolve now.

Third, the concept of coordination is a central factor of explanation. As written in part I, France has an extremely ambitious coordination goal and wants "to speak with one voice". This is also an objective that appears to be positively viewed among senior Polish officials, but it has not however the same centrality as other objectives. The comparison of the tasks of SGAE and UKIE confirm this.

Political opportunity structures are also relevant for explanation. In France, they seem to favour coordination with an executive, sometimes divided but generally strong, a weak Parliament, and a majoritarian party system. In Poland, there is a development towards bipolarism but as of yet no stable parties. There is also a "comparatively weak government with frequent changes" (Lippert/Umbach 2005 : 53) common to the other CEE

countries, which affected "the concrete EU policies of these countries in terms of content, sequencing and timing of policy reforms and may also be a factor for delayed public administration reforms" (Lippert/Umbach 2005 : 56). Instability at the level of line ministries also causes problems. These features can affect the stability and credibility of those coordination structures subjected to changes.

Finally, administrative opportunity structures are decisive. In France, sectorization is strong, but the culture of coordination under the authority of the Prime minister counterbalances it. In Poland, the administrative culture for inter-ministerial coordination is not developed enough yet to allow a structure like UKIE to exert full authority. There is a common ambition for coordination, but not to the same extent. Differences in the political-administrative culture are therefore decisive.

VI. A REINFORCED POLISH COORDINATION IN THE FUTURE?

Finally, Poland is developing its own solution. The sharing of experience can be considered a 'pick and choose approach' with Poland choosing elements that can fit in its system. Poland has not fully replicated the French model: it is the general organisation of coordination that has been retained, and then specificities are adapted, making it a unique system. Of course, the original decision of going this way does not mean it will stay for ever. However, one may suppose it will remain in this general direction, since systems are path-dependent. This will depend on the normalisation of the coordination system in Poland. As said in part II, UKIE is a young structure and its sheer existence is still controversial.

This way, the result of this work confirms the thesis that there is neither inevitable convergence nor continued diversity: "two imperatives are at work- pressure towards convergence and system specific adaptation- that neither necessarily predominates, and that the outcome in terms of the organization of coordination is partial similarity combined with significant diversity" (Kassim/ Peters/ Wright 2000 : 237). It also highlights the limits of an administrative model's exportability. French civil servants themselves point out that administrative examples are not about selling a French model: the partners of France would not specifically want a French, an English or an Italian model, but rather a model adapted to them. Administrative exchanges are however an interesting opportunity to share experiences and create links between administrations, enhancing their functionality and their professional and technical capacities. Since there is no single European administrative model, a simple export of administrative models from 'old Europe' to the new Member States cannot be a solution. No simple lesson can be drawn from the older administrative system: the best way to adapt might be then to look at the best practices within the EU. As the more general literature on institutional transfer and learning demonstrates, models are never simply copied.

Poland has arrived at a turning point now. It is no longer trying to get into the EU; rather it is a full member, which means it is not under EU constraints for accession anymore and can define a strategy concerning the place it wants to have in the EU. Elections have opened a period of changes which can affect its EU coordination system. Now that it is a member State, it can concentrate more on the preparation of negotiations and less on implementation, and it is likely to reorganise the national system of coordination of EU policy in this perspective. Therefore, it might get even closer to the French system.

REFERENCES

Assemblée Nationale 2001 : Délégation pour l'Union Européenne, *Compte-rendu n°167*, Présidence de M. Alain Barreau

www.assemblée-nationale.fr/europe/c-rendus/c0167.asp#p55-18791

Rev.2005.08.30

Deloche, Florence 1998: *La France et l'Elargissement à l'Est de l'Union Européenne*, Les Etudes du CERI, Centre d'Etudes et de Recherches Internationales, Fondation Nationale des Sciences Politiques

Documentation Française/ Vie Publique 2005: *Qui coordonne l'action du gouvernement dans le domaine communautaire?* Découverte des institutions, l'Europe

www.vie-publique.fr/decouverte_instit/europe/europe_2_3_0_q3.htm
Rev.2005.03.11

Egide 2000: *Lettre d'Egide n°18: dossier: L'expertise administrative française dans les programmes communautaires*, Centre Français pour l'accueil et les échanges internationaux

www.egide.asso.fr/fr/services/actualites/lettre/L18/dossier18.jhtm

Rev 2005.08.30

Goetz, Klaus H/ Wollmann, Hellmut 2001: Governmentalizing central executives in post-communist Europe: a four-country comparison, *Journal of European public policy* 8:6 December 864-887

Goetz, Klaus H 2001: Making sense of post-communist administration: modernization, Europeanization or Latinization? *Journal of European Public Policy* 8:6 December 1032-1051

Guyomarch, Alain/Machin, Howard/Ritchie, Ella 1998: *France in the European Union*, Macmillan Press

Institut für Europäische Politik/Jean-Monnet-Lehrstuhl für Politikwissenschaft-Universität zu Köln/College of Europe 2002: *Minutes of the workshop on Europeanisation of Public Administration in Central and Eastern Europe. The case of Poland*- prepared by Gaby Umbach and Dorota Pyszna

www.iep-berlin/forschung/moe-europaeisierung/projektaktivitäten/natolin-minutes.pdf Rev.2005.08.30

Kassim, H/Peters, B.Guy/Wright, Vincent 2000: *The National Co-Ordination of EU Policy- The Domestic Level*, Oxford University Press

Lequesne, Christian 1993 : *Paris-Bruxelles,* Presses de la foundation nationale des sciences politiques

Lippert, Barbara 2004 : *Bilanz und Folgeprobleme der EU-Erweiterung*, Institut für Europäische Politik, Europäische Schriften 79, Nomos

Lippert Barbara/Umbach, Gaby 2005: *The pressure of Europeanization*, Institut für Europäische Politik, Europäische Schriften 82, Nomos

Meimeth, Michael/Schild, Joachim 2002 : *Die Zukunft von Nationalstaaten in der europäischen Integration*, Deutsche und französische Perpektiven, Leske + Budrich, Opladen

Menon, Anand 2000: France in: Kassim, H/Peters, B.Guy/Wright, Vincent 2000: *The National Co-Ordination of EU Policy- The Domestic Level*, Oxford University Press

Ministère des Affaires Etrangères, 2005: *La France en Pologne, Présentation et historique*-La coopération technique

www.ambafrance-pl.org/rubrique.php3?id-rubrique=56 Rev.2005.08.30

Ministère de la Fonction Publique 2000 : *La présence française à l'international,* Journées d'Etudes de la DGAFP et de la DIRE

www.fonction-publique.gouv.fr/communications/journees_etudes/200400.pdf Rev.2005.08.30

Nizard, Lucien 1973 : Administration et société : planification et régulation bureaucratiques, *Revue française de sciences politiques*, 23 (2) p 216

Sauron, Jean-Luc 2000: *L'administration française et l'Union Européenne*, Institut International d'Administration Publique, La Documentation Française

Sources d'Europe, Centre d'Information sur l'Europe 2005 : *Le Secrétariat Général du Comité Interministériel* (Union Européenne- Représentation des intérêts français)

www.info-europe.fr/document.dir/fich.dir/QR001006.htm Rev.2005.04.11

SGAE, Services du Premier ministre 2005 : *Le SGAE, garant de l'unité de la position française au sein de l'Union Européenne* (Présentation)

www.SGAE.gouv.fr/HtmlPages/PresentationSGAE.html Rev.2005.03.11

Szukala, Andrea 2003: France: *The European transformation of the French model,* in Wessels, Wolfgang/Maurer, Andreas/Mittag, Jürgen (Eds.): Fifteen into one? The European Union and its Member States, Manchester University Press.

Urz␣d Komitetu Integracji Europejskiej 2005: *Overview on UKIE*

www2.ukie.gov.pl/www/en.nsf/0/A975947E1A51BEA3C125705B003DFE64?open

Rev.2005.08.30

Wessels, Wolfgang/Maurer, Andreas/Mittag, Jürgen 2003: *Fifteen into one? The European Union and its Member States,* Manchester University Press

Zubek, Radoslaw 2001: *A core in check: the transformation of the Polish executive*, Journal of European Public Policy 8:6 December 911-932