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**Mainstreaming Gender in the European Union:
Getting the Incentives Right**

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Mainstreaming Gender in the European Union: Getting the Incentives Right*

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Abstract:

The European Union, like many other international organizations and governments, committed itself during the 1990s to the “mainstreaming” of gender issues across all policy areas at all stages in the policy process. Nonetheless, more than a decade after the Union’s initial commitment, this commitment has not led to consistent and effective implementation. The problem, we argue, lies in the failure to “get the incentives right,” mobilizing sufficient interest among crucial actors, beginning within the bureaucracy of the international organizations or governments in question. Organizations like the European Commission are more successful in achieving their objectives when they provide “hard” incentives for bureaucrats to implement reforms. Cross-cutting mandates are less successful when they depend exclusively on “soft” incentives such as persuasion and socialization. This has been the case, we demonstrate, within the Commission, which has relied exclusively on soft incentives in its implementation of gender mainstreaming, with highly variable results after over a decade. By contrast, we demonstrate, the Commission has utilized hard incentives in the adoption of another cross-cutting mandate, on equal opportunities for men and women officials, resulting in rapid, quantifiable progress. The limited impact of gender mainstreaming on EU policy outputs, therefore, reflects not an inherent flaw of the mainstreaming concept, but rather the Commission’s choice to rely almost exclusively on soft incentives in implementation.

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Introduction

In the ongoing quest to improve opportunity and political inclusion for women, perhaps no effort is more promising, or more controversial, than “gender mainstreaming,” which aims to insert a gender-equality perspective into all levels of “mainstream” public policy. This endeavor has supporters far and wide, from the UN Fourth World Conference on Women in Beijing, which endorsed gender mainstreaming in 1995, to a variety of other international organizations, national governments, and even regional and municipal governments across the developed and developing worlds. The international leader in this adoption process is the European Union, which made an early commitment to gender mainstreaming in 1996 by enshrining the concept in its constitutive treaties and promoting the discourse of mainstreaming in all policies and all institutions of the EU.

Early assessments of mainstreaming in the EU were generally positive. They lauded the entrepreneurial European Commission for establishing coordinating networks and utilizing gender-sensitive policy tools, and noted that pioneering Commission Directorates-General (DGs) have adopted a gender perspective in issue-areas such as employment and social affairs, development, regional policy, and research and technological development (Pollack and Hafner-Burton 2000, Mazey 2001).

Nonetheless, more than a decade after the Union’s initial commitment to gender mainstreaming, its rhetoric has not led to consistent and effective implementation. This is true both among EU member states and at the European Commission’s Brussels headquarters, where EU policy-making generally begins. Rather than the consistent spread of a gender perspective to all issue-areas and all DGs, we find a highly variable and voluntaristic adoption of gender-sensitive policy-making, with intense focus on gender in some areas and little or no apparent activity in others.

This uneven outcome is significant not just for gender equality, but for other issues like the “greening” of public policies and sensitivity to race and disability, whose advocates also seek horizontal or “cross-cutting” inclusion of new themes across the policy process. It is perhaps most striking at the level of international organizations, which have demonstrated a remarkable and encouraging responsiveness to diverse stakeholders and new issues in recent years, mirroring the development of horizontal mandates and “joined-up governance” in domestic politics. Yet

IOs show inconsistent effectiveness in their mainstreaming efforts, as do governments and their sub-units.

The problem, we argue, lies in the failure of such organizations to mobilize sufficient interest among crucial actors, beginning within the bureaucracy of the IO or government in question. The challenge for an IO like the European Commission is to motivate its bureaucrats to conform to cross-cutting mandates, on gender or other issues. We hypothesize that IOs are more successful in achieving their objectives when they provide “hard” incentives for relevant bureaucrats to implement reforms, whether through carrots (positive incentives) or sticks (negative incentives). Cross-cutting mandates are less successful when they depend exclusively on “soft” incentives such as persuasion and socialization of the bureaucrats in question. This does not mean that attempts at persuasion and socialization are futile or ill-conceived, but the success of such efforts is likely to be at best selective, succeeding only insofar as a proffered policy frame “resonates” with officials’ existing world-views and interests (Pollack and Hafner-Burton 2000). As a result, global norms such as gender mainstreaming are most likely to change politics – to alter routines in meaningful ways and change the substance of policy outputs – when their implementation serves elite bureaucratic self-interest.

Our article is organized in five parts. In the first, we introduce the concept of gender mainstreaming and articulate our core argument about the effectiveness of hard and soft incentives in securing the implementation of cross-cutting mandates. In the second section, we analyze the empirical record of gender mainstreaming in one international organization, the European Commission, examining policy outputs across the full range of Commission activities. Specifically, we detect a highly variable and voluntaristic pattern of gender mainstreaming by selected DGs and scant mainstreaming by others. In the third section, we argue that this variable and, to some extent, disappointing record of implementation is due largely to the Commission’s extensive reliance on what we call “soft” incentives for policy officials. Outside of a small number of pioneering DGs these “soft” efforts to socialize and persuade reluctant officials to “take gender seriously” have failed to significantly change behavior.

An implicit counter-factual in our argument is that hard incentives would lead to more consistent implementation of mainstreaming across DGs. While we cannot test this claim directly, the fourth section of the article offers a comparative study of another gender-related, cross-cutting mandate: the Commission’s Fourth Action Programme on Equal Opportunities for

Men and Women in the Commission, which focuses on the recruitment, retention and treatment of qualified women officials. Early action programs from 1988 onward used soft measures, which resulted in only marginal improvements in most DGs by the early 2000s. But the Fourth Action Programme, introduced in 2004, incorporated the use of hard incentives, including binding measures and “name and shame” annual reports. The result was rapid, quantifiable improvement across virtually all DGs of the Commission.

In light of these findings, we conclude in the final section that any deficiencies in efforts to mainstream gender are due not to the concept itself, but to the process of implementation. The EU’s current approach of using only soft incentives is unlikely to lead to significant mainstreaming of gender across the policy process, or to successful implementation of other cross-cutting mandates in domestic and international governance.

1. Gender Mainstreaming and Cross-Cutting Mandates: Getting the Incentives Right

The prospect of genuine gender mainstreaming is both potentially revolutionary and extraordinarily demanding. It could transform the full range of public policies to promote gender equality – but only if a wide range of actors change their behavior. Gender mainstreaming has been defined as the “the (re)organisation, improvement, development and evaluation of policy processes, so that a gender equality perspective is incorporated in all policies at all levels and at all stages, by the actors normally involved in policy-making” (Council of Europe 2008: 1). By definition, then, a successful gender-mainstreaming mandate should result in the diffusion of gender-informed processes and policy outputs to all units of an IO such as the European Commission. It should also produce an eventual impact on women and men “on the ground” in the EU’s member states. Put differently, a mainstreaming mandate in the EU or in any other political system should in principle result in developments at three different levels: *process*, *outputs*, and *outcomes*.

Ultimately, both scholars and activists are most interested in policy *outcomes* – the impact of mainstreamed public policies on the lives of women and men. In our case, understanding those outcomes would mean examining the impact of policies on the ground in the EU’s 27 member states. However, as Tamar Gutner and Alexander Thompson (2008) have argued in a recent analysis of “IO performance,” measuring the success of mainstreaming through analysis of outcomes is of questionable utility, for two reasons. First, and most

obviously, the methodological challenges of collecting data on policy outcomes across the full range of issue-areas in 27 different member states, or even in a representative sample of such states, would demand enormous resources. Second, even if such resources could be mustered, a multitude of variables could intervene between EU policy-making and policy outcomes in the member states. Thus a flawless implementation of mainstreaming in Brussels might not lead to consistent results in the member states, or a flawed policy adopted in Brussels might appear successful in light of national-level policy outcomes.

Given these difficulties, much of the literature on gender mainstreaming has focused instead on *process* as the dependent variable. Existing studies seek to measure how and to what extent organizations like the European Commission have employed horizontal policy mechanisms to instill a gender-sensitive perspective across the entire bureaucracy and throughout all phases of the policy-making process. In these studies, the success of mainstreaming is judged according to the tools and procedures used to instill gender equality in the policy process (see e.g. Hafner-Burton and Pollack 2002).

There are shortcomings, however, to a purely process-based assessment of mainstreaming, because even an elaborate mainstreaming system may in practice fail to produce policies that reflect a gender perspective. For this reason, we believe the most reliable measure of successful gender-mainstreaming is *policy outputs* of departments, ministries, or – in our case – the Directorates-General and services of the European Commission.ⁱ Given the Commission's central role as the agenda setter of the EU policy process, any EU mainstreaming strategy intended to impact people's lives in member states must include the diffusion of gender into the policy outputs of the various DGs and services of the Commission.

Thus the dependent variable of our study is the policy outputs of the various Commission DGs and services, with a focus on the extent to which those policies are explicitly gendered to anticipate their respective impacts on men and women, and to reduce gender inequality. Our hypothesized independent variable is the nature of Commission-wide processes used to promote gender mainstreaming throughout the organization, especially the use of hard or soft incentives to influence the behavior of officials in the various DGs.

We stipulate, as in rationalist models of bureaucratic politics, that the Commission is a complex bureaucracy, divided into ministry-like subunits, Directorates-General and services, each characterized by a distinctive set of policy preferences and expertise. These DGs are

potential bottlenecks in the integration of a gender perspective across *all* policy areas. The challenge for gender mainstreaming, or indeed any cross-cutting policy, is to motivate “the actors normally involved in policy-making,” though these actors may consider gender issues to be irrelevant or even a hindrance to their core policy goals. In this sense, gender mainstreaming is a variant of the classic principal-agent problem, in which a principal – in this case the College of Commissioners at the top of the Commission hierarchy – seeks to alter the behavior of thousands of officials or *fonctionnaires* across dozens of DGs and services. The challenge, in principal-agent terms, is to “get the incentives right.”

The behavior of IO officials could be altered, in theory, through one of two types of institutional measures. Following Abbott and Snidal (2000), we refer to these as “hard” and “soft” measures, with the former establishing precise, binding and enforceable rules, while the latter employs less precise, non-binding guidelines and voluntary compliance. Hard measures, for example, could materially influence the incentives of IO officials by making individual pay or promotion dependent upon successful integration of gender into the issue areas handled by those officials. Somewhat further down the continuum toward soft incentives would be the use of social pressure, or “naming and shaming” exercises, in which both leaders and laggards in mainstreaming would be systematically identified and publicly praised or shamed for their performance.ⁱⁱ Indeed, international relations scholarship offers evidence that international commitments are more effective when backed by hard sanctions than when promoted exclusively by soft-law exhortations (see e.g. Hafner-Burton 2005; Rhodes and Citi 2007).

Nevertheless, hard instruments are not the most commonly used method for promoting the spread of a gender perspective in international organizations or governments. In recent years, constructivist and sociological institutionalist scholars have emphasized the prospects for deliberation, persuasion, and collective preference formation among both national and supranational actors within international organizations (see e.g. Risse 2000, Checkel 2005). The empirical literature generated by these claims has produced at best weak evidence of such socialization effects,ⁱⁱⁱ and Liesbet Hooghe (2005) in particular has demonstrated the difficulty of socializing Commission officials whose prior, national-level attitudes are often well established in comparison with their relatively “thin” Commission socialization. Socialization efforts related to gender mainstreaming and other cross-cutting mandates face a still-greater hurdle, since they often take the form of occasional (and typically voluntary) training sessions or periodic cross-

departmental meetings whose central message may cut against the organizational mission and the views of colleagues within a given official's home DG.

Despite these obstacles, both scholars and practitioners have placed considerable stock in the prospects for persuasion and socialization in the adoption of cross-cutting mandates such as gender mainstreaming. Catherine Weaver (2008), for example, recently undertook a study of gender politics at the World Bank, documenting a belief among many Bank officials that the exclusive use of hard incentives is likely to result in superficial compliance, while a sustained process of persuasion and socialization is more likely to lead to internalization and long-term compliance. Weaver finds that gender advocates within the Bank have consciously avoided formal mandates as a “mechanism to incite behavioral change in Bank management and staff,” in the belief that such efforts would create resentment and ““lead to a sterile filling-in of boxes in standard documents”” (Weaver 2008: 15).^{iv} Similarly, many EU Commission officials we interviewed expressed a preference for the long-term process of training, awareness-raising, persuasion and socialization, believing it yields more consistent implementation even though, as they often emphasized, it takes time.^v Alternatively, of course, the choice of soft rather than hard incentives might equally well represent a lack of political will at the top of the Commission hierarchy, or an unwillingness to enforce compliance with the mainstreaming mandate, which may be a low political priority for Commissioners. We are agnostic on this point, which speaks essentially to the private motives of leading Commission officials; in any event, nothing in the following analysis relies on such an interpretation of Commission officials' motives.

We do not disagree that a well-designed, long-term process of socialization could eventually lead to the diffusion and internalization of a gender perspective among officials in diverse DGs and services. Indeed, Judith Kelley (2004) and others have suggested convincingly that, even where hard incentives provide the primary motivation for actors to change their behavior, the specific nature of those changes may be guided, at least at the margins, by socialization and learned norms. Nevertheless, given the well-documented obstacles to such socialization, we hypothesize that gender mainstreaming and other cross-cutting mandates are most likely to be successful – that is, to integrate the desired perspective into internal IO procedures and produce measurable policy outputs – when the mandates use hard, binding instruments to alter the incentives for IO officials *even in the absence of any successful persuasion or socialization*.

This hypothesis is in principle testable, and were it not for a large literature emphasizing the virtues of soft instruments, persuasion and socialization, might in fact seem self-evident. Nevertheless, testing this hypothesis in an IO such as the European Commission, or indeed across IOs, is challenging for several reasons. First, as Gutner and Thompson (2008: 4) point out, measuring IO performance on a specific issue is difficult and contentious, with success often lying “in the eye of the beholder.” If an IO’s policy output mentions gender or the environment, does that constitute evidence of successful mainstreaming? The researcher can attempt to design clear and discriminating metrics for distinguishing genuine mainstreaming from “cheap talk,” but some degree of interpretation will necessarily remain.

Second, it is difficult to isolate the hypothesized independent variable – i.e., the use of hard or soft instruments – from other competing explanations for the dependent variable of IO policy outputs. Within a single IO such as the Commission, for example, gender mainstreaming is likely to be implemented using a single set of instruments, providing no variation on the proposed independent variable. By contrast, we may look across IOs and see variation in the use of hard and soft instruments, but the IOs in question may also vary substantially in other important ways, including membership, the control relationship between the IO and its state principals, the nature of the issue-areas covered, and so on.

Third, and in some ways most insidiously, constructivist students of mainstreaming argue plausibly that norm internalization takes a great deal of time, especially when policy entrepreneurs proffer radical ideas that require a major shift in organizational thinking to be most successful. In this view, any evidence of weak or non-existent implementation of a mainstreaming mandate may be explained away with the argument it is too soon to draw a conclusion. While this “wait and see” claim is in principle unfalsifiable, we find the argument unconvincing in our case of EU gender mainstreaming. As we shall see below, more than a decade after the EU’s official adoption of a gender-mainstreaming mandate, we and other scholars find little evidence of socialization of officials outside a core group of pioneer DGs, and we detect at best a modestly positive trend in the spread of mainstreaming across the Commission’s DGs and services over time.

In light of these challenges, we employ three fundamental research-design criteria, which allow us to isolate the causal role of hard and soft instruments in determining policy outputs. First, in our study of mainstreaming across Commission DGs, we use multiple indicators of

gender policy outputs, drawing from Commission work programs and annual reports and comparing our findings from these sources to our own and other scholars' qualitative fieldwork.

Second, in an effort to trace a causal link between the use of hard incentives on the one hand, and successful policy outputs across the DGs on the other, we engage in process-tracing based on hard primary sources and extensive fieldwork carried out over eight years in Brussels, including interviews with officials from various DGs as well as from other EU institutions and non-governmental organizations.

Third and finally, we not only analyze the EU gender-mainstreaming mandate, we also compare it to another closely related, cross-cutting mandate in the European Commission. Gender mainstreaming was designed to instill a gender perspective in the policy processes and outputs of every Commission DG and has been implemented almost exclusively through soft instruments, with results that we examine presently. The second, comparative case study is the Commission's Fourth Action Programme for Equal Opportunities for Women and Men at the European Commission. This "Equal Opportunities" mandate also sets a gender-related goal for all units of the Commission, calling for all DGs to offer equal opportunities to women and men and to hire or promote women to leading positions within the Commission hierarchy. Feminist policy scholars consider such affirmative-action or "positive-discrimination" mandates to be more difficult than gender mainstreaming, and to encounter greater resistance among officials, because they represent a direct challenge to notions of individual fairness and to the careers of male officials (Rees 1998). However, the Commission's Equal Opportunities mandate has relied extensively on "hard" incentives, including specific targets, reporting requirements, and public "name-and-shame" reports of underperforming DGs, with results that we analyze below.

2. Mainstreaming in the Commission: A Pattern of Variable, Voluntaristic Take-Up

From a research design perspective, our first challenge is to measure the dependent variable of gender mainstreaming in the policy outputs of the various DGs and services of the European Commission. This challenge is made greater by the fact that the Commission has conducted only one systematic DG-by-DG survey of the implementation of mainstreaming, in 1998, and thereafter has provided no systematic public account of gender mainstreaming in either the process or the outputs of its DGs (Commission 1998). Most subsequent Commission documents, including the Commission's web page on gender mainstreaming, acknowledge that

some sectors have made far greater progress than others. “Best practice” is clustered within just a handful of sectors, such as employment, Structural Funds, development, and research. There remains little or no evidence of effective mainstreaming in other core issue-areas, such as the internal market and agriculture, or in most other areas of EU competence (Commission 2008c).

Previous studies of mainstreaming in the Commission similarly identified a number of “pioneer” DGs – including DG Employment, Social Affairs and Equal Opportunities (EMPL), DG Development (DEV), DG Regional Policy (REGIO) and DG Research (RTD) – which moved relatively quickly after the 1996 mainstreaming mandate to integrate gender equality into their activities (Pollack and Hafner-Burton 2000, Mazey 2001). Indeed, several of these DGs were already actively engaged in gender issues prior to the 1996 mandate. Our interest here is to assess whether a gender perspective has diffused *beyond* these pioneer DGs to the rest of the Commission and to all issue-areas in EU policy-making. To do so, we rely on two admittedly imperfect measures of gender-related activity. The first draws on the Commission’s annual “work program” for the 2006-2010 “Road Map” on gender equality, while the second examines the annual reports filed by the DGs and posted on the Commission web site.

After a series of multiannual “equal opportunities” action programs adopted since the 1980s (Hoskyns 1996), the Commission in 2006 adopted a new multiannual “Road Map” on gender equality. The Road Map reaffirmed the Commission’s commitment to a “dual track” approach by combining specific actions for women with a reinforced commitment to gender mainstreaming. It also laid out a series of priority actions and an unusually precise and detailed timetable for their achievement in the period between 2006 and 2010 (Commission 2006a).

Following the adoption of the Road Map, the Commission published an annual “work program” in 2007 and 2008, designed to assess progress toward the specific goals laid out in the Road Map (Commission 2007a, 2008a). These work programs are useful for our purposes here because they include detailed annexes that identify each Road Map activity, note the actions taken (or not taken) during the previous year, and identify the DG or service responsible for the specified activity. These annexes do not provide a perfect measure of policy outputs for each DG, since some DGs may produce policy outputs that are informed by gender yet are not related to the specific Road Map activities. Similarly, these work programs may miss gender-mainstreaming processes put into place within a DG, if such processes are not (yet) manifested in policy outputs. Nevertheless, a careful reading of the work programs reveals a wide range of

activities, including internal memos and studies, suggesting that even modest gender-related activities are captured in these annexes.

To create a preliminary index of gender-related policy outputs, we drew upon the Commission's 2007 and 2008 work programs, identifying for each DG the total number of activities actually carried out during the previous year. The results are shown in Appendix 1, which lists every Commission DG and service in alphabetical order in the first column, followed by the number of activities undertaken by each DG in 2007 (second column) and 2006 (third column). The results are striking. Taking 2007 as a benchmark (the most recent year for which figures are available), we find no activities mentioned for 17 of the 41 DGs and services listed on the Commission's website, while 15 DGs and services list one or two activities each. The bulk of the activities come from DG Employment, Social Affairs and Equal Opportunities, which alone accounts for 40 of the 91 activities reported for 2007, or 44 percent. The remaining six DGs, which reported between three and eight activities each, include DG Education and Culture (EAC) with eight; DG Development and EuropeAid (AIDCO), which represent the two successors to the original DG Development and together account for eight activities; DG Research, with five; DG Justice, Freedom and Security (JLS), also with five; and DG REGIO, with three.

Comparing this list with the list of pioneering DGs in Pollack and Hafner-Burton's (2000) study, we see that five of the seven most active DGs had already moved to mainstream gender within a few years of the official Commission mandate: DG EMPL held primary responsibility for the gender dossier and led the way in mainstreaming gender into the EU Employment Strategy; DG DEV (and later AIDCO) both followed and reinforced ideas within the development community about integrating gender in development lending, and led the way in requiring mandatory training for its officials in Brussels and in the field; DG REGIO mainstreamed gender in the policy process as early as 1997, requiring member states to account for gender in their regional development plans and mandating a minimum percentage of women members on all Structural Fund committees; and DG Research developed an early and still-thriving Women in Science program, designed to encourage scientific research by, for and about women, and again mandating participation by a minimum number of women scientists in EU scientific committees.

The only new additions to this list are DG EAC, which has very recently adopted a proactive approach to integrating gender in educational and training programs, and JLS, which has an active program on halting trafficking in women and children. By contrast, most other DGs appear infrequently if at all in the work programs, with 41 percent of all DGs listing no gender-related activities in 2007, and another 37 percent listing one or two activities.

One could argue that considering the full sample of Commission DGs and services creates a bias against successful gender mainstreaming because it includes 5 “General Services” as well as 12 “Internal Services,” the latter of which generally play at best a minor policy role. To account for that, the final line of Appendix 1 summarizes our findings for a restricted list of only those DGs and services the Commission designates as responsible for “policy” or “external relations.” These restricted results offer a slightly more favorable but not fundamentally different assessment of mainstreaming in the Commission. In the restricted results, six DGs list no gender-related activities, 10 DGs list one or two activities, and seven DGs list three or more activities.^{vi}

Overall, the Commission’s own assessment of the Road Map, and indirectly of its gender mainstreaming mandate, is mixed. The Commission points to the growing list of discrete activities in many issue-areas as evidence of undeniable progress 18 months after the adoption of the Road Map. Nevertheless, the document goes on to note the uneven take-up of the mandate among the various DGs and services, and “invites” them to increase their activities with regard to gender (Commission 2008a: 14-15). What is clearly missing here is any “hard” incentive that DG EMPL officials can brandish to influence their counterparts in other, mainstream, DGs.

As a second indicator, we consulted the Annual Reports issued by each DG and Service in the Commission and made publicly available on the Commission website. These reports, which are relatively brief (approximately 20 to 50 pages per DG), are a more crude indicator than the Commission’s work programs for the Road Map, but nevertheless provide a sense of the political importance the DGs place on gender issues. They also have the advantage of providing data on each DG’s efforts in another cross-cutting mandate, on equal opportunities within the Commission (see below). We therefore surveyed the reports of each of the 41 DGs and services, looking for discussion of gender, women, sexual equality and equal opportunities in the public policies of each unit. The results are shown in column four of Appendix 1, and with a few notable exceptions, are roughly in agreement with our findings from the work programs.

We find that relatively few DGs and services mention gender issues in their respective policies, with only 11 of 41 reports (or 27 percent) mentioning women or gender in policies. By and large, the DGs with the largest number of activities in the work programs are also those that give greatest prominence to gender in their annual reports. These include EMPL, DEV, AIDCO, RTD, and ADMIN, with six other DGs providing at least a brief mention of gender in their respective policies. Only one of the leading DGs in the work programs (EAC) failed to mention gender in its annual report, while at the other extreme most of the inactive or minimally active DGs in the work programs also have no mention of gender in their annual reports. Once again, if we restrict our sample to policy and external relations DGs, the picture improves somewhat, with nine out of 23 reports (or 39 percent) making any reference at all to gender in their policies.

Taken together, these data support the view that Commission DGs and services have shown sharp variation in their mainstreaming of gender issues. The picture that emerges is hardly one of inactivity, since several DGs have adopted and implemented strikingly progressive gender policies in areas such as employment, development, education, and research, and have shown modest progress over time. Nevertheless, it is clear that the gender mainstreaming mandate has been enthusiastically accepted by just a few leading DGs, which continue to account for the vast bulk of EU activities. A much larger number of DGs show at best modest evidence of having incorporated any gender concerns into their respective policy outputs, a result that we explain elsewhere (Pollack and Hafner-Burton 2000).^{vii}

These findings support those from our own qualitative, interview-based research, as well as from recent scholarship^{viii} and non-governmental organizations such as the European Women's Lobby (2007). Verena Schmidt (2005), for example, concluded that mainstreaming was poorly understood and even more poorly implemented in several key DGs, while Maria Stratigaki (2005) criticized the gender mainstreaming mandate for drawing resources and attention away from existing and effective policies on gender equality and replacing them with a vague mandate that most DGs have implemented weakly or not at all. Along similar lines, the European Women's Lobby (2007: 1) has grown increasingly critical of gender mainstreaming, citing insufficient budgeting, impact assessment and training for Commission officials, along with sluggish development of new legislation and policies. The Lobby argued in a recent review of the Commission's "Road Map" on gender equality that:

It still appears difficult to *involve all services in the Commission* even though the Roadmap clearly extends beyond the sole competencies of the Employment Directorate General.

In sum, while individual Commission DGs have implemented a number of progressive gender policies over the past decade, the Commission as a whole shows at best partial progress towards a genuine mainstreaming of gender issues across all units and all issue-areas.

3. Soft Instruments, Weak Incentives

These weaknesses in the implementation of gender mainstreaming, we argue, stem from the Commission's almost exclusive use of soft instruments to influence the behavior of the various "mainstream" DGs. A "hard" gender mainstreaming program would score high on Abbott and Snidal's (2000) three dimensions of obligation, precision, and delegation, with (a) binding provisions entailing (b) precise responsibilities and commitments for Commission officials, backed by (c) strictly enforced positive and negative sanctions for compliance and noncompliance. By contrast, a "soft" mainstreaming program can be characterized by (a) non-binding provisions with (b) vague or imprecise aims and (c) little or no attempt to monitor and sanction officials for compliance and noncompliance.

In practice, as Abbott and Snidal (2000) note, international legal provisions can be arrayed across a continuum from hard to soft law, reflecting the degree of obligation, precision and delegation inherent in those provisions. Similarly, the gender mainstreaming tool kit can also be arrayed along a continuum from soft to hard, including, *inter alia*, the establishment of coordinating committees or networks of gender-mainstreaming officials; collection of gender-disaggregated statistics; checklists, manuals and handbooks; gender training; gender impact assessment of policies; post-hoc monitoring and evaluation of policies; and enforcement of policy through sanctioning of public officials at both the Commission and member-state levels (Hafner-Burton and Pollack 2002).

In the case of the EU, the institutional machinery and procedures put in place by the Commission fall overwhelmingly at the "soft" end of the spectrum. They have a vague overall mandate, a heavy emphasis on non-binding instruments like networking and training, and little or no monitoring, public reporting or enforcement that would encourage reluctant "mainstream"

officials to take gender seriously in the policy process. The Commission has put together a series of cross-departmental networks at various levels, from the College of Commissioners to the lower levels of the Commission bureaucracy. But the activities of these networks have largely consisted of coordination meetings, voluntary training exercises and the dissemination of policy tools such as handbooks and checklists. The groups have lacked the ability to provide hard incentives, or sanctions, for officials in traditionally “non-gender” DGs to systematically consider and integrate gender into policy-making. Schmidt’s study of mainstreaming in two Commission DGs highlights this lack of hard incentives, noting that “there are no incitements or sanctions for particularly good or bad advances made with regard to gender mainstreaming in different DGs” (Schmidt 2005: 173). Moreover, the few hard incentives for Commission officials, such as annual reporting requirements for each DG, appear to have *weakened* over time.

The Weakness of Soft Instruments: Networks and Training

At first glance, the European Union’s official documentation enumerates an impressive series of cross-departmental networks and working groups established at various levels, including:

- The Fundamental Rights, Anti-discrimination and Equal Opportunities Group (formerly the Equal Opportunities Group) of Commissioners, intended to coordinate the mainstreaming of gender and other cross-cutting anti-discrimination mandates at the highest level.
- An Inter-Service Group on Gender Equality, composed of officials who hold primary responsibility for promoting the integration of a gender perspective within their respective DGs.
- A High Level Group of member-state officials, responsible for monitoring Commission behavior and coordinating the mainstreaming of gender in national policies.
- An Advisory Committee on Equal Opportunities for women and men.
- A group of experts on Gender, Social Inclusion and Employment (Commission 2008c).

Led by the “Commissioners Group,” these networks are responsible for formulating the overall goals of the mainstreaming process, diffusing a gender perspective through training, socialization, and the development of specific policy tools, and monitoring the development of policies for evidence of successful mainstreaming. They are coordinated by a core group of dedicated Commission officials within the Equal Opportunities Unit of the DG EMPL, who have attempted over the years to “export” a gender perspective to other DGs.

In practice, however, the soft character of the mandate for these groups has hampered their effectiveness. As a result, they have failed to meaningfully change the incentives or the behavior of officials outside the core network of mainstreaming advocates. For example, the Commissioners Group is supposed to meet quarterly, but met only once during 2007. It is supposed to offer the DGs direction in their implementation of gender mainstreaming as well as other anti-discrimination issues, but has offered little meaningful guidance, according to Commission officials.

At a lower level, within the Commission bureaucracy, the Inter-Service Group on Gender Equality has continued to meet on a regular basis, three to four times per year, to discuss experiences and best practices. Nevertheless, according to officials within and outside the Commission, the group has failed to secure the adoption of a gender perspective within many DGs. According to our sources, Inter-Service Group meetings are attended largely by low- or mid-level officials within the various DGs, rather than high-ranking officials such as Directors-General, Directors or Heads of Unit. The result, according to participants, is a network of like-minded and well-informed but relatively low-level officials who lack the influence within their DGs to overcome resistance to what is often perceived as an intrusive and irrelevant mainstreaming mandate. (In the words of one Commission official, “these are the poor sods who have to go back and nag at the hierarchy.”^{ix}) Furthermore, despite repeated requests from the European Women’s Lobby and other actors, the Inter-Service Group’s membership has not been made public, so outsiders have difficulty following the work of the group or holding its members accountable.^x

Other soft instruments, including most notably training, have proven similarly disappointing. While some Directorates-General, such as DG Development, have introduced mandatory gender training for some or all of their “mainstream” officials, the bulk of gender

training offered within the Commission has been voluntary, and attended largely by low-level officials who have a pre-existing interest in the subject.

The Paucity of Hard Instruments: Monitoring and Sanctions

The use of cross-departmental networks, socialization and training are useful but insufficient without hard incentives that compel reluctant officials to take gender mainstreaming seriously and implement it consistently. Hard incentives for Commission officials would include the monitoring of policy outputs in each and every sector of EU policy and the application of positive and negative sanctions for compliance or noncompliance by individual DGs or officials.

In practice, however, systematic monitoring and sanctioning of Commission officials has been scant from the beginning of the gender mainstreaming process, and actually appears to have weakened over time. During the first several years of the Commission's gender-mainstreaming mandate, for example, the Inter-Service Group decided to assemble an annual report on the implementation of gender mainstreaming (Commission 1998). It was distinct from the Commission's preexisting annual report on "Equality Between Women and Men in the European Union," and required each DG to submit an update on progress in its specific sector. This reporting requirement was a subject of controversy within the Commission, according to Schmidt. While some felt pressure to show progress, others noted that even a negative report was unlikely to result in meaningful sanctions (Schmidt 2005: 91). Whatever the initial utility of annual reporting on gender issues by each DG, that practice has now, to our knowledge, been discontinued. The Commission does monitor the implementation of the activities spelled out in its 2006-2010 Road Map, but it does not, to our knowledge, impose an explicit reporting requirement on the DGs, nor does it publish such information in an effort to "name and shame" individual DGs.

This absence of mandatory reporting, assessment and publicity stands in contrast to the Commission's Fourth Action Programme on Equal Opportunities (see below), as well as to the methods of other international organizations such as the World Bank, which requires systematic reporting by its subunits and commissions and publishes external evaluations of the various units' performance on gender mainstreaming. Thus "mainstream" DGs face no systematic reporting on their implementation of the gender-mainstreaming mandate, no public naming and

shaming for poor performance, and no other material sanctions for positive or negative performance with respect to gender issues in public policy.

Our interviews with Commission officials across several DGs confirm this absence of hard incentives. Asked explicitly whether Commission officials had strong incentives to incorporate gender into their daily policy-making activities, one official in DG Employment and Social Affairs answered, “No, not really.” For a Commission *fonctionnaire* preparing a policy or a draft decision, this official continued, “gender’s not going to be the reason why your thing goes up or down.” The Council of Health Ministers, for example, is unlikely to send back a Commission proposal because it doesn’t pay enough attention to gender. So leaving gender out “isn’t going to be terribly visible,” and is unlikely to adversely affect one’s career.^{xi}

Another official in a “mainstream” DG, Development, concurred, saying officials felt “no particular pressure” to integrate gender in external-relations policies. By and large, this official said, DGs that took on gender issues most often did so at the initiative of a high-level official within the DG, and not because of pressure from above. If the Commission wanted to move beyond such a voluntary approach, she continued, the gender-mainstreaming mandate should be mandatory and “included in rules.”^{xii}

Schmidt’s excellent study of mainstreaming in two DGs (DG ADMIN and DG EMPL) similarly notes the Commission’s near-total absence of any hard sanctions related to mainstreaming, and her interviews with Commission officials reveal a three-way division of views, with some officials rejecting the use of sanctions, others recommending positive sanctions, and a third group proposing negative sanctions. Among the first group are those who suggest Commission officials should not be penalized for poor implementation of a program that may rely on the cooperation of officials in other DGs or in the member states (Schmidt 2005: 186). The second and third groups – whether they favor positive or negative sanctions – are represented by one official who Schmidt quotes as saying:

Everybody should be in fear of the Lord. There need to be consequences when gender mainstreaming is not implemented. [...] That means that in the thinking and in the daily planning of humans who implement it, it has a high priority and that as a consequence, I will be promoted. Whereas if I don’t do it, I won’t be promoted. That is the precondition (quoted in Schmidt 2005: 187).

We should, of course, beware of relying too heavily on the views of a few Commission officials about the prerequisites for successful gender mainstreaming. Nevertheless, the remarkable consistency of such views among Commission officials in our own and Schmidt's work, together with the aforementioned evidence of weak or non-existent incentives for integrating gender into activities, offers a powerful explanation for the highly variable, voluntarist pattern of policy outputs. Fortunately, we have additional evidence of the power of hard incentives to motivate behavioral change in cross-cutting policy mandates: the Commission's equal opportunities policy.

4. Equal Opportunities Policy and the Power of Hard Incentives

In our interviews with Commission officials across various DGs, we were struck that several officials noted a marked contrast between the relative weakness of the gender mainstreaming mandate and the greater success of a second cross-cutting mandate, also related to gender: the Fourth Action Programme for Equal Treatment for Men and Women in the European Commission. As early as the 1980s, the Commission recognized as a problem the large gender imbalance among Commission officials, and particularly among "A-grade" senior administrators. So it instituted three Action Programs, in 1988-1990, 1992-1996, and 1997-2000, to address the issue. It also introduced non-binding quantitative targets from 1995 onwards regarding the recruitment of women candidates to administrative positions within the Commission.

The issue of equal opportunities within the Commission services received a new impetus in the early 2000s, following the 1999 resignation of the Santer Commission due to a corruption scandal. Incoming Commission President Romano Prodi tasked Neil Kinnock, Commission Vice President in charge of administrative reform, with a top-to-bottom reform of internal Commission procedures. As part of this effort, Kinnock ordered an external evaluation of the Third Action Programme on Equal Opportunities. The evaluation was largely critical. Among its key findings were:

- a large majority of staff were not aware of their DGs having taken any particular actions in response to the 3rd Action Programme;

- there had been no perception of positive changes to working practices to reduce the conflict between professional and personal commitments;...
- despite progress already made, there is considerable scope for improvement in the representation of women in management posts (Commission 2004: 4-5).

Quantitative indicators supported the view that, despite some progress since the early 1990s, there remained a marked gender imbalance among A-grade officials (with the percentage of women increasing from 14 percent in 1994 to 23.5 percent in 2004) and Directors (up from a mere 2 percent in 1994 to a still-low 13.2 percent in 2004) (Commission 2004: 6). The Commission's summary: "The evaluation found that there had been a serious lack of consistency across DGs in the implementation of the 3rd Programme" (Commission 2004: 5).

In light of these findings, Kinnock concluded that, "A 4th Action Programme, with quantifiable measures that would be regularly monitored and whose implementation could be compared across DGs, is... the best means of ensuring that appropriate priority is given to equal opportunities policies in the different DGs and services" (Commission 2004: 5). The program accordingly identified a number of priority actions (improving the gender balance, reconciling work and family life, increasing awareness, etc.) and specified actions to be taken both by DG ADMIN as the coordinator of the policy, as well as by each of the Commission's DGs and services.

Under the rubric for improving the gender balance, for example, the Fourth Action Programme directed DG ADMIN to set annual targets for recruitment of women to A-level management and senior-management posts, to set a target of at least 40 percent gender balance on internal selection panels, and to publish annual rankings of DGs and services in meeting these target (Commission 2004: 11). Similarly, under the rubric for "reconciling personal and professional lives," the program called on DGs to promote flexible working conditions including flex time, child care, and maternal and parental leave. To that end, it instructed DGs and services to develop action plans to address the issues of long working hours, late meetings, difficult working schedules and the general organization of work at all levels (Commission 2004: 12).

Unlike previous action programs, however, the Fourth Action Programme incorporated detailed provisions on implementation, monitoring and evaluation. It noted that, "The

implementation of the Fourth Action Programme is the responsibility of DGs and services,” and introduced specific tasks, including:

- assigning responsibility for follow-up of the Fourth Action Programme to a senior official who will be the Focal Point for the 4th Programme and have it referred to in his/her job description;
- facilitate the creation of an Equal Opportunities Group, to ensure that an effective gender action plan in the DG can be prepared, implemented and monitored;
- ensuring the Annual Management Plans and Annual Activity Reports include gender equality as a horizontal theme and require a review of progress in the implementation of the Fourth Action Programme (Commission 2004: 15).

For monitoring and evaluation, the plan instituted detailed requirements for both the DGs and services, as well as for DG ADMIN as the coordinating body. DGs and services were required to:

- include, in the Annual Management Plans and Annual Activity Reports of the Directorates-General and services, gender equality as a performance indicator and include review of progress towards targets, based on the “gender equality scorecard” [provided in an annex];
- monitor the implementation of their action plans and publish an annual report, with reference to the annexed gender equality scorecard;
- publish a mid-term report on the implementation of the programme/action plan in their DG or service at the end of 2006 and a final report in 2008;
- send a copy of all reports to DG ADMIN (Commission 2004: 15).

DG ADMIN itself would:

- co-ordinate the implementation, monitoring and evaluation of the 4th Action Programme;

- publish annually an overall assessment of the programme's progress, based on the individual reports of DGs and services and establish a ranking of best performing DGs;
- submit the annual reports to the Group of Commissioners on Equal Opportunities, the Secretariat-General, the Inter-Service Group on Gender Equality and to COPEC (Joint Committee on Equal Opportunities for Women and Men);
- launch an external evaluation to review the effectiveness, efficiency and relevance at the end of the Fourth Action Programme, including recommendations for future action (Commission 2004: 15).

Thus the Commission's Fourth Action Programme on Equal Opportunities broke sharply with previous action programmes and with the Commission's mainstreaming mandate by introducing a wide range of "hard" incentives that were precise and obligatory. It mandated specific recruitment targets, established which individuals would be accountable, required annual progress reports, and brandished the threat of naming and shaming noncompliant DGs.

Just as importantly from our perspective, DG ADMIN, Kinnock, and his successor, Commissioner Siim Kallas of Estonia, have vigorously enforced the provisions of the program vis-à-vis the various DGs and services. Following the adoption of the Fourth Action Program in April 2004, the Commission promptly set numerical targets for recruitment of women in three categories (senior management, middle-management, and non-management) for each DG, while DG ADMIN instructed all Directors-General and Heads of Services to appoint a Focal Point and an equal opportunities group and to adopt an Action Plan by September 2004 (Commission 2005: 16). Just as importantly, Kallas and DG ADMIN followed up with a series of Annual Monitoring Reports collecting and presenting DG-by-DG data on recruitment, gender balance, appointment of Focal Points and equal opportunities groups, adoption of action plans, and specific actions with respect to the various program priorities (Commission 2005, 2006b, 2007c). The first monitoring report, in 2005, praised a number of DGs for appointing the required officials and groups and for adopting their respective action plans, while explicitly naming the 20 DGs and services that had failed to adopt an action plan. It also noted that the Commission as a whole had fallen short of recruitment targets for 2004, and identified leaders and laggards among the DGs in terms of recruitment and other elements of the program (Commission 2005: 1).

In later reports, the Commission again “named and shamed” specific DGs for excellent or poor performance in the program’s various indicators, and for the first time adopted “binding measures” and specific recommendations to DGs that had consistently failed to meet the assigned targets. The second annual monitoring report, in 2006, was particularly critical in this regard, noting that, across the Commission as a whole, the annual targets for recruitment of women had not been met during the first six months of 2006 for any of the three categories set down (Commission 2006b: 2-5). The report therefore recommended specific instructions to individual DGs, and introduced “binding measures,” applicable in 2007 for recruitment and appointments to middle management, including requiring under-performing DGs to transmit written explanations for their failures to meet Commission targets for inclusion of women on shortlists as well as recruitment; compulsory gender balancing for all selection panels; and the introduction of *compulsory* equal opportunities training for all Commission managers by the end of 2009 (Commission 2006b: 6).

These binding measures, in turn, were actively implemented by DG ADMIN, and the results for 2006 were assessed in the third annual monitoring report in November 2007. Here, the Commission noted substantial areas of progress, including an overall 52.8 percent appointment rate of women to AD posts, and a 35.7 percent appointment rate of women to senior management posts. The appointment rate of women to middle management positions continued to lag behind the 30 percent target in 2006, the Commission reported, but performance improved substantially with the implementation of binding measures from April 2007. According to the report,

... the **first results of the implementation of binding measures** from April to June 2007 show that all the **14 pre-selection procedures** taken into account **complied with the requirements...** **These 14 procedures resulted in the appointment of 7 women.** It can be concluded that the binding measures have had a **positive impact** since these 14 procedures have produced results well above the average. Nine sessions of **compulsory training for managers** were held during the reference period (March-June), attended already by 104 management staff, 17.3% of whom, were human resource managers, and 26% women. The overall assessment can therefore be that the **binding measures** adopted by the

Commission are being introduced correctly, that the **DGs are complying with them and that they already appear to be producing positive results** (Commission 2007c: 3, emphasis in original).

The results for 2007 demonstrated continued progress, most notably on recruitment where targets were for the first time met or exceeded in all three categories: 35.1 percent female appointments to senior management, 31.5 percent to middle management, and 54.2% to AD non-management posts (Commission 2008b: 1). Despite these improvements, DG ADMIN noted that even with the increased recruiting of women, the gender balance of the Commission was changing slowly. It pointed out that much of the improvement in recruitment of women came from the “EU-12” of new member states, with women continuing to lag further behind among nationals of the longstanding EU-15 members. As a result, DG ADMIN, with the support of Commissioner Kallas and the College of Commissioners, proposed to retain the binding measures adopted in 2006, and continued to single out individual DGs for best performance or for lagging in meeting recruitment targets or other elements of the action program such as the introduction of flex time, parental leave, etc. (Commission 2007c, 2008b).

The effectiveness of these hard incentives is reflected as well in our analysis of the 2006 annual reports of the DGs and services. While the gender mainstreaming mandate was mentioned in the reports of 27 percent of all DGs and 39 percent of policy and external-relations DGs, the equal opportunities mandate was referenced in 49 percent and 48 percent of those same reports, respectively (Appendix 1, column 5). Once again, these relatively brief annual reports are a crude measure of behavior in the various DGs, but as an expression of policy priorities, the differences are striking.

Finally, the effectiveness of hard incentives in the Fourth Action Programme was also underlined to us repeatedly in interviews with Commission officials. For example, the aforementioned DG Development official suggested the contrast at the very beginning of our interview. Unlike the mainstreaming language, she said, the equal opportunities mandate included specific targets and indicators which are “the only thing at the end of the day that makes a difference.” The most successful efforts, she said, are “hard-data things” and “mandatory things,” which tend to get done; all the rest are just “nice talking.”^{xiii} Another Commission official, in DG EMPL, suggested that Kallas had made a very deliberate decision to release a

report naming and shaming DGs for their insufficient recruitment of women, and said it was “horrible for a *chef du cabinet* to have to explain to their Commissioner that they were one of the worst.” This possibility provides a powerful incentive for officials to take the targets of the Equal Opportunities mandate seriously. Thus far, this official noted, Vladimír Spidla, the Commissioner for Employment, Social Affairs and Equal Opportunities, had failed to adopt a similar approach for the mainstreaming mandate.^{xiv}

In sum, both the mainstreaming and the equal opportunities initiatives represent cross-cutting mandates, introduced in the same organization at approximately the same time. Both seek to influence and change the behavior of officials in a wide range of Commission DGs and services. Yet according to standard assumptions about positive discrimination and gender mainstreaming, the equal opportunities mandate might have been expected to encounter *greater* resistance, since it challenged individual notions of fairness as well as men’s career advantages and advancement. Indeed, as we have seen, the first three action programs were widely considered to have produced relatively little change in the behavior of the DGs and services, *until the introduction of hard incentives in the Fourth Action Programme*. Since then, compliance with the targets of the program, while imperfect, has improved measurably and consistently each year across nearly the full range of DGs, and compares favorably to the slower and more inconsistent adoption of the gender-mainstreaming mandate.

The lessons of the equal opportunities case need to be assessed with care. At the most basic level, it seems clear that the introduction of hard incentives played a vital role in the success of the Fourth Action Programme, and there is reason to believe that the introduction of hard incentives could serve equally well to promote progress in gender mainstreaming. Nevertheless, as one DG ADMIN official pointed out, compliance with the equal opportunities mandate remains imperfect, with the social pressure of naming and shaming still the most common “hard incentive” in the Commission’s arsenal.^{xv} Just as importantly, the EU’s equal opportunities mandate benefited from several characteristics that made it particularly amenable to successful implementation. Practitioners inside and outside the Commission have stressed to us that the equal opportunities program benefited in particular from the ready availability of quantitative indicators of progress (such as the percentage of women hired in a given DG in a given year) that have no obvious counterpart in the gender mainstreaming mandate. Mainstreaming gender in a given sector such as transport, these officials note, does not have an

obvious quantitative indicator, but requires officials to engage in thoughtful analysis of the potential impact of their respective policies on sexual equality before designing policy responses.

Nevertheless, despite these specific features, the equal opportunities case does illustrate the successful use of other hard incentives, including (a) *procedural requirements* (naming high-level coordinators and committees, and drafting an explicit action program), (b) *reporting requirements* (annual reports submitted to the program coordinator), and (c) the prospect of positive and negative *sanctions* (naming and shaming, and the imposition of mandatory targets for DGs that are lagging) – all of which are potentially transferrable to gender mainstreaming and to other cross-cutting policy mandates in the Commission and beyond.

5. Conclusions

The European Union's and European Commission's political commitment to gender mainstreaming is striking in comparison both to other international organizations and to domestic political systems, and several of the programs carried out by the Commission in areas such as employment, development, and research, are significant and progressive. Nevertheless, if we define mainstreaming as the introduction of a gender perspective into *all* policy areas, "by the actors normally involved," then our findings suggest that the EU, more than a decade after the introduction of its mainstreaming mandate, has fallen well short of its goal. The highly variable record of performance, moreover, finds echoes in broader comparative studies of mainstreaming by both domestic polities and IOs. In a comparative survey of gender mainstreaming among advanced industrialized countries, for example, Fiona Beveridge and Sue Nott characterize their findings as follows:

The research undertaken... demonstrated that all the states involved had in place some process which they described as gender mainstreaming. In reality, however, these processes displayed few of the characteristics associated with successful mainstreaming. Typically, a somewhat piecemeal approach to mainstreaming has been adopted, with experimentation in limited fields, but with little evidence of plans to extend mainstreaming to all sectors of law and policy-making (Beveridge and Nott 2001: 112).

Such findings raise the question of whether gender mainstreaming is inherently flawed, as some critics assert, or whether the gap between rhetoric and results is the product of the EU's almost exclusive reliance on soft instruments. We contend the latter. While it is impossible to demonstrate counterfactually that a "hard" mainstreaming process would have been more effective in the EU, comparative studies suggest that domestic mainstreaming programs are not uniformly disappointing but vary considerably in effectiveness, and that statutory requirements are a significant element in successful programs.^{xvi} Our own study of the Commission's equal opportunities program similarly points to the effectiveness of hard incentives in implementing another gender-related, cross-cutting mandate.

For this reason, we argue that that gender mainstreaming – and other cross-cutting mandates beyond the scope of our empirical study here – can still be reasonably successful if correctly put into practice, with incentives for implementation outside established gender equality networks. Reflecting these beliefs, the 2007 report of the European Women's Lobby (2007: 14) proposed a series of reforms to the EU mainstreaming mandate, requiring *inter alia* the strengthening and public accountability of the Commission Inter-Service Group and the publication of DG-by-DG annual surveys of gender mainstreaming efforts. We would go further, strengthening DG EMPL's role in coordinating the gender-mainstreaming mandate by giving it the authority to require annual reports from DGs, publish its results and make specific recommendations to under-performing DGs and services. If our analysis is correct, such reforms would result in a more effective diffusion of gender expertise and a measurable increase in gender-informed policy outputs across all units of the European Commission – and hence a substantial increase in IO performance relative to the Commission's and the Union's self-declared policy aims.

This conclusion is significant not only for gender equality but also for other issues in which diverse stakeholders seek horizontal or "cross-cutting" inclusion in public policy. Global norms such as gender mainstreaming are most likely to change politics when their realization is a matter of elite bureaucratic self-interest. IOs and governments of all kinds will more successfully accomplish such objectives when they use carrots and sticks to create "hard" incentives for their bureaucrats to implement the new policies than when they depend entirely on persuasion and socialization.

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**Appendix 1: Gender Mainstreaming and Equal Opportunities in
41 Commission Directorates-General and Services^{xvii}**

| Directorate-General/ Service | Number of 2007 Actions^{xviii} | Number of 2006 Actions^{xix} | References to Women/Gender/ Mainstreaming in Public Policy, 2006 Annual Report^{xx} | References to Equal Opportunities in Commission Services, 2006 Annual Report^{xxi} |
|---|---|---|--|---|
| DG Agriculture and Rural Development AGRI | 1 | 1 | One reference. | One reference. |
| DG Budget BUDG | 1 | 1 | No references. | Multiple references. |
| Bureau of European Policy Advisors BEPA | 2 | 1 | Multiple references. | No references. |
| DG Communications COMM | 1 | | No references. | No references. |
| DG Competition COMP | | | No references. | One reference. |
| DG Development DEV | 3 | 2 | Two references. | One reference. |
| DG Economic and Financial Affairs ECFIN | | | No references. | No references. |
| DG Education and Culture EAC | 8 | 3 | No references. | No references. |
| DG Employment, Social Affairs and Equal Opportunities EMPL | 40 | 25 | Multiple references. | Multiple references. |
| DG Energy and Transport TREN | | | No references. | One reference. |
| DG Enlargement ELARG | 1 | | One reference. | No references. |

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|---|---|---|--------------------------|----------------------|
| DG Enterprise and Industry ENTR | 1 | 2 | No references. | No references. |
| DG Environment ENV | | | No references. | One reference. |
| EuropeAid AIDCO | 5 | 2 | Multiple references. | One reference. |
| European Anti-Fraud Office OLAF | | | No references. | One reference. |
| European Personnel Selection Office EPSO | | | See equal opportunities. | Multiple references. |
| Eurostat (ESTAT) | 1 | 1 | No references. | No references. |
| DG External Relations RELEX | 2 | 2 | One reference. | No references. |
| DG Fisheries and Maritime Affairs FISH | 1 | 1 | No references. | One reference. |
| DG Health and Consumer Protection SANCO | 1 | 1 | No references. | No references. |
| DG Humanitarian Aid ECHO | 1 | 3 | No references. | No references. |
| DG Informatics DIGIT | | | No references. | Two references. |
| DG Information Society and Media INFSO | 2 | 1 | One reference. | No references. |
| Internal Audit Service IAS | | | No references. | No references. |
| DG Internal Market and Services MARKT | 1 | 1 | No references. | One reference. |
| DG Interpretation SCIC | | | No references. | One reference. |

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|---|---|---|----------------------|----------------------|
| Joint Research Center JRC | | | No references. | Multiple references. |
| DG Justice, Freedom and Security JLS | 5 | 4 | One reference. | No references. |
| Legal Service SJ | | | No references. | No references. |
| Office for Infrastructure and Logistics in Brussels OIB | | | No references. | Multiple references. |
| Office for Infrastructure and Logistics in Luxembourg OIL | | | No references. | Multiple references. |
| Office for the Administration and Payment of Individual Entitlements PMO | | | No references. | No references. |
| DG Personnel and Administration ADMIN | 4 | 3 | Multiple references. | No references. |
| Publications Office OPOCE | | | No references. | No references. |
| DG Regional Policy REGIO | 3 | 2 | No references. | No references. |
| DG Research RTD | 5 | 2 | Multiple references. | No references. |
| Secretariat-General SG | 2 | 1 | No references. | One reference. |
| DG Taxation and Customs Union TAXUD | | | No references. | No references. |
| DG Trade TRADE | 1 | | No references. | One reference. |

| | | | | |
|---|---|--|--|---|
| DG Translation DGT | | | No references. | One reference. |
| TOTALS – All DGs and Services | * 91 actions by 23 DGs. * 56% of DGs with at least one activity. * DG EMPL constitutes 44% of all activities. | * 59 actions by 20 DGs * 40% of DGs with at least one activity. * DG EMPL constitutes 42% of all activities. | 11 out of 41 Reports (27%) mention women/gender in policy. | 20 out of 41 Reports (49%) provide information on equal opportunities in Commission employment and recruitment. |
| TOTALS – All Policy and External Relations DGs and Services ^{xxii} | * 81 actions by 17 DGs. * 74% of all DGs with at least one activity. * DG EMPL constitutes 49% of all activities. | * 52 actions by 15 DGs. * 65% of all DGs with at least one activity. * DG EMPL constitutes 48% of all activities. | 9 out of 23 Reports (39%) mention women/gender in policy. | 11 out of 23 Reports (48%) provide information on equal opportunities in Commission employment and recruitment. |

Notes

ⁱ At this writing, in August 2008, the Commission is composed of 41 DGs and services, listed in Appendix 1, and typically referred to as “DGs” for short.

ⁱⁱ Following Johnston’s (2001) landmark article, we distinguish between the use of “social pressure,” e.g. through naming and shaming, from the effort to persuade or socialize individuals. The former, Johnston points out, seeks to alter the *incentives* of officials but need not alter their core preferences, while the latter involves precisely an effort to change officials’ preferences or conceptions of their own interest through “internalization” of new ideas and norms.

ⁱⁱⁱ See e.g. recent work by Hooghe 2001; Kelley 2004; Schimmelfennig and Sedelmeier 2005; and Zürn and Checkel 2005, all of whom find weak evidence of socialization of officials within the “most likely” case of EU institutions.

^{iv} It is nevertheless striking that the Bank, by contrast with the EU, has engaged in more systematic oversight and reporting requirements of various units, as well as the use of evaluation by independent, external evaluators, in what Weaver refers to as “accountability politics.” (Weaver 2008: 14-15).

^v Interviews, Commission officials, Brussels, 28 November 2007, and 2 April 2008.

^{vi} It is worth noting, moreover, that the omission of the “internal” and “general services” DGs deletes from the sample several DGs and services that have demonstrated some commitment to gender issues, including the DG Administration (which supervises the active program on Equal Opportunities within the Commission; see below) and the Bureau of Economic Policy Advisors (which has incorporated gender into some of its reports to the Commission president, due at least in part to the presence in the Bureau of Agnès Hubert, previously a leading figure in DG EMPL’s mainstreaming effort). Just as importantly, the Commission has explicitly called upon several of the internal or service DGs to incorporate gender in their activities, but we find little evidence of compliance from those DGs. The most notable of these is DG Budget, which was asked to explore a systematic “gender audit” of the EU budget but has shown little progress in doing so. Gender budgeting has encountered significant resistance within the Commission, according to

several officials we interviewed, although the Commission's most recent (2008a: 13) work program indicates that a feasibility study for gender budgeting is currently underway.

^{vii} The sources of this variation, we have argued in a previous article, can be explained largely in terms of social-movement theory, and in particular in terms of the extent to which gender issues “resonate” with the missions of particular DGs, as well as the presence or absence of sympathetic officials (either Commissioners or high-level civil servants) in key positions within the various DGs. Commission officials point to both factors in interviews, noting the obvious resonance of gender in DGs such as EMPL and DEV, as well as the presence of active Commissioners or high civil servants in other DGs such as REGIO and RTD. For an extended discussion, see Pollack and Hafner-Burton 2000.

^{viii} Exemplary recent scholarship on EU gender mainstreaming, much of it critical of Commission or member-state efforts, includes, *inter alia*, Rubery et al. 2003, Schmidt 2005, Stratigaki 2005, Lombardo and Meier 2006, Beveridge 2007, Beveridge and Velluti 2008, and Woodward 2008.

^{ix} Interview, Commission official, Brussels, 28 November 2007. This same official also noted, however, that DG EMPL is making a concerted effort to recruit higher-level officials to attend meetings that touch on their specific areas of specialization.

^x Interview with Judith Wirth, policy specialist, European Women's Lobby, 27 November 2008.

^{xi} Interview, Commission official, DG Employment and Social Affairs, Brussels, 28 November 2007.

^{xii} Interview, Commission official, DG Development, Brussels, 28 November 2007.

^{xiii} Interview, Commission official, DG Development, Brussels, 28 November 2007.

^{xiv} Interview, Commission official, DG Employment and Social Affairs, Brussels, 28 November 2007.

^{xv} Correspondence, Commission official, DG ADMIN, 9 October 2008. This same official,

moreover, noted that DG ADMIN, while pursuing hard incentives for compliance, also sought actively to persuade and socialize officials within the growing network of Commission human-resource officials within the various DGs, suggesting that hard and soft incentives can be pursued in parallel, and not strictly as alternatives. We have noted a preference for this dual approach among other officials, but we note Johnston's (2001) important insight that mechanisms designed to encourage social pressure (such as public naming and shaming) can serve to reduce the scope for persuasion (often presumed to thrive in informal, private settings), and vice-versa. In practice, officials are likely to encounter significant trade-offs between these two socialization mechanisms.

^{xvi} See e.g. the studies of domestic (national and local) mainstreaming mandates in Beveridge, Nott and Stephens 2000; Squires and Wickham-Jones 2004; Rees 2005; and Walby 2005.

^{xvii} Each report was searched for multiple terms: women, gender, mainstreaming, *femme*, *genre*, equal opportunities, and *égalité*. Where the terms appear, each passage was categorized, using content analysis, as referring either to mainstreaming gender in policy, or to equal opportunities in human resources policy. In EPSO and ADMIN, personnel actions were interpreted as mainstreaming in those particular areas of policy. The passages themselves vary in length and substance.

^{xviii} Source: Commission of the European Communities 2008: 16-51.

^{xix} Source: Commission of the European Communities 2007a: 20-37.

^{xx} Source: 2006 annual reports of the Commission DGs and services, available on the Commission website at: http://ec.europa.eu/atwork/synthesis/aar/index_en.htm, accessed on 18 May 2007.

^{xxi} Ibid.

^{xxii} Excludes "general services" (Communication, European Anti-Fraud Office, Eurostat, Publications Office, Secretariat General) and "internal services" (Budget, Bureau of Economic Policy Advisors, Informatics, European Commission Data Protection Officer, Infrastructures and

Logistics – Brussels, Infrastructures and logistics – Luxembourg, Internal Audit Service, Interpretation, Legal Service, Office for Administration and Payment of Individual Entitlements, Personnel and Administration, and Translation).