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Martin Lodge, Kai Wegrich and
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Martin Lodge, Kai Wegrich and Gail McElroy¹

Abstract

Cultural theory has attracted considerable interest in the study of risk regulation. There has, however, been a lack of a systematic interest in its claims and in methodological issues. In this paper, we present seven claims that are either directly drawn from central claims of cultural theory or from complementary theories and assess them in the light of one single case, failure in meat inspections in Germany. These claims are assessed through the analysis of argumentation in newspapers.

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Introduction

Three issues occupied German newspapers during the summer of 2006. One obvious and anticipated one was the staging of the football world cup and the (unanticipated) success of the German national team. The second event was the hunt and eventual killing of a disturbed brown bear. The bear, quickly christened 'Bruno' (JJ1 in official language), had strolled into Bavarian territory from his 'home ground' in the Italian Alps. For over a month, 'Bruno' successfully evaded various and numerous attempts at tracking him down until a 'license to kill' was issued by the responsible Bavarian minister. The bear was killed the next day, provoking substantial criticism against that minister. The third issue raising public concern and involving the very same Bavarian minister was *Gammelfleisch*, the revelation that putrid meat had been systematically sold across Europe by a number of meat distribution companies, mainly from Bavaria, but also from other parts of Germany.

Besides being of concern for consumers of kebabs past and present², *Gammelfleisch* offers an important case for investigating underlying claims made by grid-group cultural theory and its predictions about patterns of change in the context of an 'evocative moment' and crisis (for cultural theory, see Thompson et al. 1990). While cultural theory has received considerable attention (and mixed praise) in the study of risk perceptions and has been utilized in studies interested in control instruments within and by government, attempts at developing this theoretical framework further in terms of establishing causal mechanisms and observable implications for a more general use in public policy research have been rare.

This paper explores a number of claims that lie at the heart of cultural theory in order to put this particular public policy approach 'to work' for more systematic and general analysis. It does so by exploring the case of *Gammelfleisch* – an example of a failure of German meat inspections to identify putrid meat, affecting in particular deliveries to kebab take-aways. While this case is interesting in itself in terms of a political-administrative crisis situation – it offers insights into the repeated (and, for some, inevitable) failure to stop an undesired activity from occurring, thereby putting ministers under pressure – it also provides critical insights into the German system of public administration. In the wider sense, it therefore also contributes to the broader literature on the 'contested governance' of food safety in Europe (Ansell and Vogel 2006). In conclusion, this paper suggests that grid-group cultural theory seems to tell us something about the way in which public policy evolves and which deserve wider investigation.

Putting cultural theory to work

One of cultural theory's particular attractions has been its claim to parsimony, dividing culture into four (possibly five) worldviews (hierarchy, egalitarianism,

² Kebabs are arguably the most popular German national dish, on par with chicken tikka masala in Britain.

individualism, fatalism, and ‘the hermit’) that are in continuous contention and contestation with each other.

Each worldview is characterized by fundamentally different understandings about the nature of the world, contrasting ways of structuring social relations, and underlying cause-effect relationships – leading to contrasting diagnoses of policy problems and advocacy of policy solutions. Self-interest, according to grid-group cultural theory, is embedded in particular worldviews – and thus the availability of particular strategies is embedded in distinct institutional settings (Wildavsky 1987). Any institutional arrangement, such as a regulatory regime, has to be understood as a temporary settlement that reflects the dominance of one worldview over others (or a coalition of worldviews over others).

As society is composed of competing worldviews that are in continuous contestation and temporary agreement with each other, any institutional settlement is exposed to criticisms and exploitation. In the world of cultural theory, change occurs through processes of surprise and disappointment. Experience of disappointment (i.e. the failure of assumed cause-effect relationships to alleviate a problem when applied) encourages the formation of alternative coalitions that offer competing ‘solutions’ to problems, leading eventually to the replacement of the original institutional settlement (see 6, 2004).

In other words, inherent conflict means that coalitions are inherently unstable. Instability, ‘hunting around’ and change are less surprising than stability. Grid-group cultural theory suggests that temporary stability is achieved through the formation of ‘coalitions’, ‘clumsy solutions’ (Verweij and Thompson 2006) or ‘hybrids’. Such hybrids (i.e. devices emerging as ‘coalitional pacts’ between different worldviews) receive a somehow ambivalent treatment in the literature, with some suggesting they offer a way to achieve advanced stability (Hood 1998: 233-9, Thompson and Ellis 1997: 4-10), while others point to an inherent temporality, as tensions will eventually lead to the destruction of any particular hybrid (Thompson et al. 1990: 86-93, Lodge and Wegrich 2005a: 420).

Table 1 illustrates the well-known 2x2 exposition of cultural theory with its four types – based on the distinction between (high or low) rule (or grid) - and (high or low) group-boundedness. An important extension to this work has been the application of cultural theory typology to the study of control and regulation. Table 1 indicates how regulatory approaches reflect particular worldviews (see also Hood 1996, 1998, Hood et al 1999, 2001, 2004).

Table 1: Cultural theory and approaches towards regulation

		Group	
		Low	High
Grid	High	Fatalism Control through unpredictable processes/Inherent fallibility	Hierarchy Anticipative solutions, forecasting, and management, response to enhanced authority and hierarchical ordering
	Low	Individualism Control through rivalry and choice, incentives to underpin market and individual choice processes	Egalitarianism Control through group processes, network style, participation

While grid-group cultural theory has attracted considerable interest in the measurement of risk perceptions through the use of surveys, and has joined the political science equivalent of the ‘hall of fame’ through inclusion in the *Oxford Handbook of Contextual Political Analysis* (Thompson, Verweij and Ellis 2006), it has received considerably less attention in the study of public policy.³ Grid-group cultural theory may not be of a predictive kind, but the broad level of abstraction and generality in which the claims are put forward and how the evidence is presented are somewhat problematic. Cultural theory seems very good at putting a different perspective (or, rather, different perspectives) on past events, making competing rationalities explicit and pointing to broad mechanisms of change, but there has been too little methodological effort in terms of developing causal mechanisms and observable implications as well as evidence selection that goes beyond the casual and the typological (as useful as such exercises are).

Some of the problems in such an undertaking are inherent in grid-group cultural theory itself – issues that relate to wider debates about what constitutes ‘science’ (for example, for those that suggest that science requires prediction and falsification). Wildavsky, Ellis and Thompson argued that cultural theory would be falsified if similar institutions generated different worldviews, or where different institutional contexts generated similar cultural biases (Thompson et al 1990: 273). Assuming an inherent ‘socio-cultural variability’ within any institutional setting, even such a claim appears overly general, if not misplaced: Given the inherent instability predicted by cultural theory, comparison and generalization appear problematic as different responses may reflect the distinct temporality that underlines interactive policy processes. Possibly the most predictive component of grid-group theory is the argument that failure occurs due to the black spots of particular worldviews. A second key claim is that institutional arrangements reflect and are therefore reactive to shifts in dominant worldviews.

The rest of this section develops two sets of claims that are either directly drawn from grid-group cultural theory or utilize this particular framework to explore complimentary claims in the social science literature. These different claims should not be understood as necessarily competing claims or hypotheses, instead, they offer insights into central and complimentary arguments that link directly back to

³ Exceptions are Hood 1996, 1998, and Hoppe 2007. See also Swedlow 2006: xviii-xx.

grid-group cultural theory. These claims are utilized to analyze one particular case, namely *Gammelfleisch*.

In doing so, this paper invites three sets of criticisms, one that this is an unfaithful representation of cultural theory, a second would be a more fundamental objection to grid-group cultural theory as a device to take the study of public policy further. The third criticism is to suggest that (given the nature of grid-group cultural theory) such endeavours are fundamentally flawed and therefore the theory should be discarded straight away. However, in order to have these debates, the level of discussion needs to move beyond the present level.

Claims

Turning to those claims that can be directly drawn from grid-group cultural theory first, one (if not the) central claim is that all four worldviews are represented in any social system. Whilst any regulatory regime is composed of instruments that reflect a dominance of particular worldviews at some particular point in time (or even a single worldview), this institutional choice is surrounded by competing worldviews (and interests) that seek to highlight the weaknesses of the existing regime in order to replace this with more preferred (from their viewpoint) policy instruments. Argumentation and discourse regarding ‘what went wrong’ and ‘what should be done’ will be particularly prominent when it comes to crisis. Supporters of the existing regime are expected to demand ‘more of the same’, while opponents will advocate instruments derived from their particular worldview, with all sides offering their distinct diagnosis about the nature of the problem.

Drawing on the above, the paper therefore investigates the following three claims⁴

- C1: All four worldviews are represented when it comes to diagnosing failure and advocating solutions
- C2: When regulatory reforms occur, the choice instruments will reflect the dominant worldviews at that particular time
- C3: Actors put forward hybrid arguments to encourage a ‘coalitional’ hunting around for solutions

The three claims above are drawn directly from grid-group cultural theory. C1 reflects on the standard claim that cultural theory devices should be utilized to ‘audit’ policy domains in order to understand the distribution of worldviews within a domain or organization (Swedlow 2002, Thompson 1997). C2 reflects the widely held argument that dominant coalitions will seek to embed their preferred policy options through institutional choices. Institutional choice is therefore reactive to

⁴ We choose the word ‘claims’ and the abbreviation C instead of the more usual term ‘hypothesis’ and ‘H’ in order to avoid confusion with the use of H as abbreviation of ‘hierarchy’ used later in our analysis.

change in dominant worldviews (measured in terms of the amount of aggregated expressed views in the print media).

C3 makes a strong assumption: It assumes that hybrids are strategic devices for the construction of new coalitions. Actors prefer the ‘purity’ of their own worldview, but realize the advantages of temporary coalitions with other worldviews. Therefore, coalitions emerge around hybrids. As such, this claim appears uncontroversial. However, a number of problems arise. One concerns the number of theoretical and practical possibilities of hybrid formation, even in the relatively parsimonious world of four pure worldviews only. On the one hand, one could argue that it will be difficult for anyone to express views that attract followers of all four worldviews at the same time, given the inherent tensions and contradictions this would display. On the other hand, the study of argumentation has suggested that the same word can be attractive to different worldviews for different reasons at the very same time. The latter issue raises not only problems regarding coding (discussed below), but also suggests that the number of hybrid combinations may be considerable. At this point, we do not want to explore this problem further, but instead investigate the existence of hybrids in the first place and concentrate on hybrids drawn from two worldviews.⁵

While the above three claims are directly related to grid-group cultural theory, this paper also seeks to put it to work as a device to explore claims emerging in complimentary literatures. We utilize the patterns that emerge from an analysis inspired by cultural theory to assess arguments made mostly in the broader institutional literature. One such complimentary argument is that institutions offer a significant moderating role against ‘hunting around’ patterns (Lodge and Wegrich 2005b). Institutions are said to promote particular worldviews over others. Although autonomy and ‘turf protection’ can be regarded as self-interested political and/or bureaucratic responses, how individual or organizational positions are put forward fundamentally reflects worldviews. Even if arguments are regarded only as *ex post* rationalizations of fixed preferences and interests, these arguments become part of the public discourse – they therefore do matter (Majone 1989: 2).

In the following, we assess two particular claims that link cultural theory with institutional analysis. One relates to the view that political systems resemble a ‘processing machine’ in which issues are processed in predictable ways. Hence, similar patterns (or life cycles) emerge over the course of the various *Gammelfleisch* episodes. The other claim relates to the well-established view of filtered institutional responses to criticism in the policy environment, namely that sustained criticism will trigger a process of ‘staged retreat’ (Laughlin 1991), in which institutions at first filter out demands for change that attack their ‘policy core’, until there is a fundamental ‘transformation’ of policy. In other words, the analysis should reveal at first a response that reflects the underlying dominant worldview, which then gets increasingly challenged, and, eventually, replaced.

C4: Institutions filter and structure argumentation about regulatory regime change.

⁵ A further justification is that this is the level with which hybrids have been discussed in the existing literature.

C5: Over time, given sustained criticisms, institutional regimes are softened up, therefore exhibiting, over time, a ‘staged retreat’ pattern.

If C4 was to hold, we would therefore expect to witness similar argumentation patterns over the course of the various *Gammelfleisch* episodes under consideration in this paper. If C5 was to hold, then the observed patterns would suggest a significant change between various episodes that would be expressed not only in the higher degree of exposure (or total amount of argumentation), but also by a higher degree of diversity in the types of arguments being made and, potentially, the emergence of a new dominant pattern.

At the same time, as critical observers of risk regulation have suggested, moments of perceived crisis are characterized by ‘moral panics’, ‘issue attention cycles’ (Down 1972) and ‘vicious cycles’ (Breyer 1993) and demands for ‘more control’, leading to undesirable ‘over’-regulation that is disproportionate to the actual risk to human health. Therefore, the pattern should reveal a dominance of calls of a ‘hierarchical’ kind that, over time, fade away.

C6: Crisis moments are characterized by imminent calls for hierarchy that then somewhat fade away over the course of the (media) issue attention cycle.

Finally, this paper also investigates a variant of the ‘blame management’ hypothesis. Accordingly, argumentation is not concerned about expressing particular worldviews, but rather about shifting blame elsewhere. Applied to the context of the German system of co-operative federalism, blame-shifting occurs across levels of government, i.e. the federal level suggests that Land administrations have implemented legislation poorly, whereas Land administrations blame poor laws. Thus, the analysis should reveal claims demanding the reallocation of authority to be particularly prominent; therefore, C7 investigates the extent to which ‘blame management’ is institutionally moderated in the particular German political context.

C7: Within ‘hierarchical claims’ and within the overall pattern, ‘multi-level government’-related claims dominate.

To recap, whereas the first three claims investigate core arguments that represent grid-group cultural theory, the second set of claims utilizes the patterns observed through the lens of a typology generated by grid-group cultural theory in order to investigate arguments derived from complimentary, rather than competing literatures. These claims are investigated in one particular context – that of a crisis linked to an ‘evocative moment’. So-called evocative moments arguably make patterns predicted by grid-group cultural theory particularly prominent. Drawing conclusions from such a limited exercise is admittedly problematic; nevertheless, as this paper is mainly interested in generating debate about grid-group cultural theory, even the illustration of a single case study (over a number of episodes) should offer some analytical mileage.

Case selection and method

Gammelfleisch offers an example of an event (associated with a highly evocative term) where the perception of ‘crisis’ – triggered in particular also by the recurring nature of the problem – allowed for the emergence of widespread argumentation. In order to consider the claims discussed above in the case of *Gammelfleisch*, the analysis was conducted through the following steps. First of all, using Lexis Nexis News, newspaper articles for the time period February 2001 to April 2007 containing the words *Gammelfleisch* (between November 2005 and November 2006) or *Fleischskandal* (February 2001 to November 2005) were analyzed according to particular claims being made.⁶ A total of 508 claims was entered into a database including date, source, author of the claim and its target (where appropriate). These claims were analyzed according to their cultural biases and coded according to their cultural type.

Methodologically, coding is inherently associated with a number of problems; most of all, this method is vulnerable to coder bias, both at the stage of extracting claims from newspaper reports and at the stage of coding itself. In order to moderate these problems of bias, the analysis was conducted independently by two researchers and then moderated. There was a relatively high inter-coder reliability of about 0.8. In addition, the different claims were also categorized (via moderation between two researchers) within their different cultural ‘types’ in order to allow for comparison within worldviews and also to make particular choices transparent and also to allow for more in-depth analysis (for example, in order to investigate C7).

The coding frame is illustrated in the Appendix and should be seen as a result of an inductive process rather than as an initial set of choices that were then applied to the text analysis. The coding frame reflects dimensions of cultural theory and those hybrids that were in evidence in the particular *Gammelfleisch* episodes. Claims were linked to *hierarchy* when these implied the potential improvement of controls via enhanced authority (for example, by reordering of authority, improved anticipative instruments and management, as well as sanctions). In contrast, claims were associated with *fatalism* when these either advocated elements of surprise and unpredictability as effective means of control or offered a lament on the impossibility of controlling capitalist food processing and production. Claims defined as representing *individualism* advocate market-related processes that enhance individual choice or the autonomy of market participants (such as through a reliance on self-regulation), while *egalitarianism*-related claims point to the demand for ‘high group’ processes, such as increased ‘professionalism’, network-type ‘governance’ and enhanced forms of participation.

Hybrids were identified when a single statement included more than one cultural claim within one single statement. In addition, allocating policy claims to particular

⁶ The total amount of examined articles was 822. The word *Gammelfleisch* first appeared in newspaper reports in November 2005. We have used ‘*Fleischskandal*’ to cover the earlier eight months. Lexis Nexis excludes the *Frankfurter Allgemeine Zeitung*, but includes *Welt*, *Berliner Zeitung*, *Frankfurter Rundschau*, *Süddeutsche Zeitung* and *Berliner Morgenpost*, *Der Spiegel* and *Focus*. This selection of print media increases the confidence that the analysis includes key statements by centrally involved parties.

worldviews is in itself contestable; for example, in this analysis the advocacy for enhanced provisions regarding ‘whistleblowers’ has been classified as a fatalist response – given that this is a process relying on unpredictable and anonymous tip-offs. This choice contrasts, for example, with Christopher Hood’s classification of ‘whistleblowers’ as an egalitarian instrument (Hood 1998: 26). Interviewees supported the classification of whistleblowing as a fatalist response. Similarly, ‘transparency’ is commonly associated with different worldviews, ranging from rule-type hierarchist arguments, to the egalitarian ‘town hall’ type of transparency to individualist-type ‘information enhancing’ transparency instruments (see Hood 2006). What has been defined as ‘product/consumer transparency’ in the coding frame relates to individualist ‘information-enhancing’ instruments, especially labelling. The analysis of the formal institutional regime and its change relied on formal documentation, written accounts and a dozen semi-structured elite interviews at the Land and federal level (representing the key actors involved in standard setting in meat safety policy). When arguments emphasized the importance of surprise and ‘undercover’ inspections, these were classified as ‘unannounced inspections’ (F3) and where the emphasis was on ‘stronger control’, including a stress on unpredictability in the same statement, then it was classified as ‘unannounced oversight’ of the hierarchy and fatalist hybrid type (H&F1). Having set out the claims that are at the heart of this paper and illustrated methodological choices, we now move to a brief analysis of the German food inspection regime and of events surrounding the *Gammelfleisch* crisis.

Food inspection regulation and *Gammelfleisch*

The issue of ‘bad’ meat has gone through three largely separate ‘attention cycles’ since 2000, although the 2000s were far from unique in attracting criticism about the quality of food inspection regulation. For example, the European Commission condemned the German approach towards controlling the utilization of hormones as “insufficient” in 1998. Wider issues regarding the quality of food (and its inspection) were raised when BSE (mad cow disease) was also diagnosed in Germany in 2000 after ministers and officials had assured the public that Germany was BSE-free. The first scandal within the scope of interest of this paper – occurring in May 2005 – affected one supermarket chain where staff was found to have relabelled minced meat (ground beef). This led to changes at the organizational level of that supermarket chain, but not to calls for legislative or regulatory change. In contrast, the second scandal – of late 2005 – mostly to be found as *Fleischskandal* in newspaper reports at the time but since then subsumed as part of *Gammelfleisch*, as well as the third scandal, emerging in September 2006, led to widespread calls for legislative and regulatory changes. These two latter scandals emerged in the context of the discovery by non-food inspectors of meat deemed unfit for human consumption having entered the human food chain through, for example, re-labelling.

The various *Gammelfleisch* episodes challenged a regime that reflected inherent principles of German public administration. The regime itself was in a state of flux as part of an extensive Europeanization of rules. Food inspection was a domain characterized by very typical German administrative arrangements, ranging from

European legislation, various pieces of federal governmental framework legislation (in particular, the *Lebensmittel- und Futtermittelgesetzbuch*)⁷ and actual enforcement activities conducted by the Länder. Among the German Länder, administrative arrangements varied to some extent. But, in its basic form, food inspection was delegated to the local level. Land governments were acting as oversight bodies over local enforcement activities – the volume of enforcement activity was determined in intergovernmental agreements across Länder (based on population numbers rather than volume of food production). Furthermore, the overall system of food inspection kept veterinarians separate from food inspectors, while police and customs police were also involved in surveying the food domain. Finally, the vertical and horizontal fragmentation of inspection responsibilities was complicated by ongoing changes in food inspection – namely wider administrative cut-back demands due to financial constraints that meant a reduction in inspection activities overall – although detection rates remained broadly stable.⁸

Countering this systemic fragmentation across all aspects of the regulatory regime (i.e. information gathering, standard setting and behaviour modification) were a number of ‘coordination’ devices, ranging from professional associations for food inspectors and veterinarians to procedural guidelines (with legal standing), such as the *Allgemeine Verwaltungsvorschrift über die Grundsätze der Durchführung der amtlichen Überwachung lebensmittelrechtlicher und weinrechtlicher Vorschriften* (AVV Rüb).⁹ This directive had been introduced in December 2004; beforehand, there had been no federal-wide standards regarding food inspection and enforcement activities. The AVV Rüb prescribed a shift towards a ‘risk-based’ policy in which primary reliance was placed on self-regulation and an inspection intensity that was supposed to reflect the ‘risky-ness’ of the product and the respective firm’s capacity to cope with regulatory standards.

The AVV Rüb and changes at the Land level in the way inspections were conducted were partly driven also by a changing legal environment originating at the European Union level, especially EU-provisions that came into force in during the early and mid-2000s, but had been discussed since the late 1990s. One central theme at the EU level over the past decade has been the increasing significance of prescribed standards, in particular regarding consumer transparency via labelling provisions, but also concerning the enforcement of regulatory standards in the field of inspection. As part of the EU’s ‘hygiene package’, a risk-based approach was prescribed for food safety inspections and monitoring and reporting requirements were established (882/2004/EU, taking effect in January 2006). This followed the earlier general principles that were to guide food inspections (178/2002/EU, taking

⁷ Other legislation and regulation related to food hygiene, food labelling, food inspection procedures and specific food-related provisions, among others, for example, for milk and fatty foods and minced meat.

⁸ In 1999, 66 per cent of all firms were inspected (1,304,985 inspections in 696,439 firms). By 2006, this figure had steadily declined to 50 per cent (1,091,966 inspections in 590,010 firms). Detection of violations had increased from 21 to 23 per cent when measured against the population of inspected firms. Considerable differences in terms of violations existed across food sectors and processes (BVL 2006).

⁹ An AVV (Allgemeine Verwaltungsvorschrift) represented a federal procedural guideline that needed to be agreed in the Bundesrat, the second legislative chamber representing the executives of the sub-national governments (Länder).

effect in 2005) The perception that German food safety regulation was a moving target throughout the mid-2000s therefore had largely to do with ongoing EU-law transposition activities. At the same time, attempts by the Red-Green coalition to strengthen consumer protection elements in the food safety regulatory regime in 2002 (in the wake of outrage over BSE in Germany) failed due to opposition by the Länder in the Bundesrat (dominated at the time by Christian-Democrat led governments). A watered-down version of this earlier consumer protection law was reintroduced in late 2005 and approved by the Bundestag and the Bundesrat in 2007.

At the same time, the field of food inspection was confronted with a growing internationalization and specialization of food production and, more significantly, processing, while consumer distrust following ‘mad cow disease’ was supposed to have increased. Overall, the German food inspection regime could be interpreted as an inherently ‘hierarchical’ activity in that inspectors backed by legal sanctions conducted regular control visits. Control was also associated with some egalitarian elements in the sense of the presence of ‘professional’ norms in terms of inspection styles and legal understandings, as well as in the sense of relying on a professional ‘self-control’ by companies. In addition, although career trajectories pointed to a high relational distance between inspectors and the inspected, there were nevertheless widespread accusations that long-standing relationships at the local level were encouraging lenient controls. To counter this, demands for more ‘transparency’ in terms of making inspection reports transparent vis-à-vis the wider public as well as through demands for increased product information became increasingly prominent. These demands fitted wider advocacy for the advanced legal rights of consumers.

The 2006 *Gammelfleisch* case was triggered by an anonymous call by a mushroom picker who had discovered incriminating documents in a forest in late August. Subsequently, the police raided a meat storage facility near Munich and located significant amounts of putrid meat that had escaped discovery during earlier ‘normal’ food inspections. Elsewhere in Bavaria, meat was confiscated whose ‘use by’ date had expired over four years ago. It was later revealed that the company had delivered meat, in particular kebab meat whose spicing allowed for the disguising of rank smell and taste, across Germany and Europe. Further inspections in various parts of Germany detected similar activities. No risks to human health due to the consumption of putrid meat were diagnosed, if the meat was handled appropriately at the cooking stage. The owner of the responsible firm, already faced with a substantial debt burden, committed suicide, while the federal government, in particular the federal minister for agriculture and consumer protection, Horst Seehofer, blamed the Bavarian government for insufficient enforcement. This followed the revelation that limited information about wrongdoing in that particular company had existed. The political conflict was particularly heated as it involved politicians from the same (conservative) Bavarian Christian Social Union (CSU). Länder governments were accused of enthusiastically embracing new standards and commitments without actually providing sufficient resources to advance control. On 7 September 2006, little over a week following the first media headlines, the federal and Land ministers for consumer protection agreed on a ‘framework agreement’ (a 13 point programme) for a revised ‘food inspection regime’. This

involved a commitment towards shared understandings of quality management, increased joint usage of information technology and labelling and certification demands for food products, but also an emphasis on the importance of each company's self-regulatory capacities and the continuation of the existing allocation of jurisdiction across levels of government.

At the federal level, the lack of enforcement activity at the Land level was regularly criticized and changes to the federal competition law were considered, in particular the demand to prohibit the sale of meat 'below production price' (to tackle supposed dumping). This related to the claim that wrongdoing was a consequence of the increasingly low margins in the food business given price competition in the German retail sector, driven by discount retailers and consumer preferences ('Geiz ist geil'). However, as with the 'framework agreement' between federal and Land governments, hardly anything novel could be detected in these legislative proposals, whether in terms of information provision regarding companies failing safety inspections (called 'consumer transparency', which granted individuals the right to access official inspection reports) or consultation. One further novelty was the inclusion of provisions that required ongoing evaluation of the effectiveness of the regulatory regime(s).¹⁰

Less than 12 months earlier, the Bavarian government had already been under criticism for its food inspection enforcement activities. In response, the Bavarian government established a special unit for food safety in May 2006. This followed the revelation that meat deemed inappropriate for human consumption had entered the food chain. This so-called K3 meat represented a 'new' market following provisions introduced in the wake of BSE, namely that certain meat residues were deemed unfit for human consumption and should only be used for animal food (whereas K1 and K2 were to be destroyed immediately).¹¹ Given its 'newness' and as this type of meat did not constitute 'food', this sector did not fall under the established regulatory regimes for food inspections. The company was accused of re-labelling these K3 animal parts and of introducing them into the human food chain. These activities were again not revealed through food inspections but because of an investigation of the federal customs police. At the same time, relabelled meat – way beyond its use-by date – was discovered in various storage facilities across Germany. In other cases, frozen poultry meat was defrosted, 'enhanced' in appearance by the addition of water and sold as 'fresh meat'. In December 2005, federal and Land governments agreed on a joint 10-point programme to advance information exchange across administrative units and to enhance control activities. The federal minister announced a reform of the consumer information law, building on measures that had been rejected by the Christian Democrats and Liberals in the Bundesrat in 2002, as noted. This version was supposed to enhance control activities and transparency. In March 2005, it

¹⁰ In March 2007, the federal parliament passed the consumer information law for a second time. The first attempt had not been enacted following the federal president's refusal to sign off on the legislation. The initial law with its provisions applying to the local level was seen as violating the constitutional autonomy of local government in this particular set of activities.

¹¹ Directive 2002/1774 EC. The new classification scheme led to an emergence of a K3-industry, Germany was estimated to have over 180 'K3 firms', just under a third of which located in Bavaria (*Stern*, 13 October 2005)

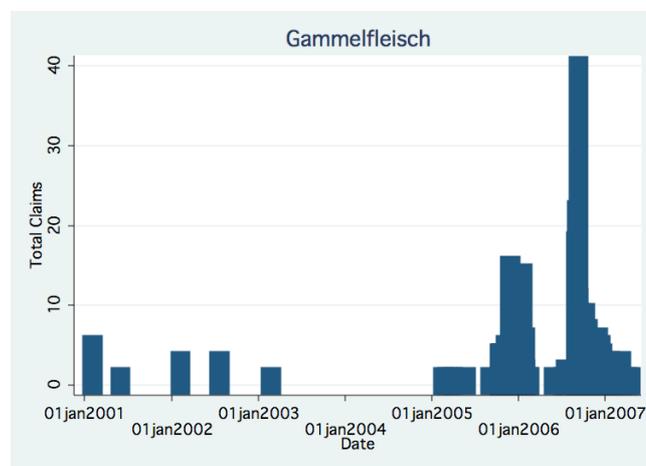
emerged that meat, in particular minced meat, was being repacked and relabelled in various shops of the discount chain ‘Real’. The supermarket chain responded by establishing ‘quality managers’.

To sum up, there have been repeated scandals that received institutional responses. While the ‘Real’ incident triggered some comment, it was particular the later two events that motivated substantial argumentation as well as attempts at institutional change. These responses suggested a kind of ‘retreat’ pattern, at least at first sight. The first time the issue of *Gammelfleisch* emerged (under the label of *Fleischskandal*) was during the period under investigation here. The initial response to that scandal was purely at the company level. The second period, of late 2005 to early 2006, saw some interest in establishing a ‘joint approach’ between federal and Land levels, without leading to much alteration of the existing direction of change. Most emphasis in these formal announcements was placed on hierarchist ideas of improving systems of control, while introducing some individualist themes (‘consumer transparency’). This bias towards enhanced hierarchical and individualist types of formal control became more prominent during the third period in September 2006. We extend this discussion in a later section of this paper.

***Gammelfleisch* and argumentation patterns**

Having set out the underlying food inspection regimes as well as the background to the *Gammelfleisch* case, this section moves to ‘application’ and assesses whether the observed patterns conform with expectations of grid-group cultural theory. It suggests some support for some of the claims central to grid-group cultural theory, whereas the more institutional and blame-shifting claims receive less support. As can be seen from Figure 1, claims emerged in the sort of ‘issue attention’ cycles discussed above, with each episode leading to more extensive argumentation (in terms of total number and time period). However, the interest of cultural theory and thus of this paper is to look at the argumentation ‘inside’ these claims, and therefore the rest of this paper looks at the type of arguments made within these issue attention cycles.

Figure 1: Cycles of Issue Attention



Worldviews and Gammelfleisch

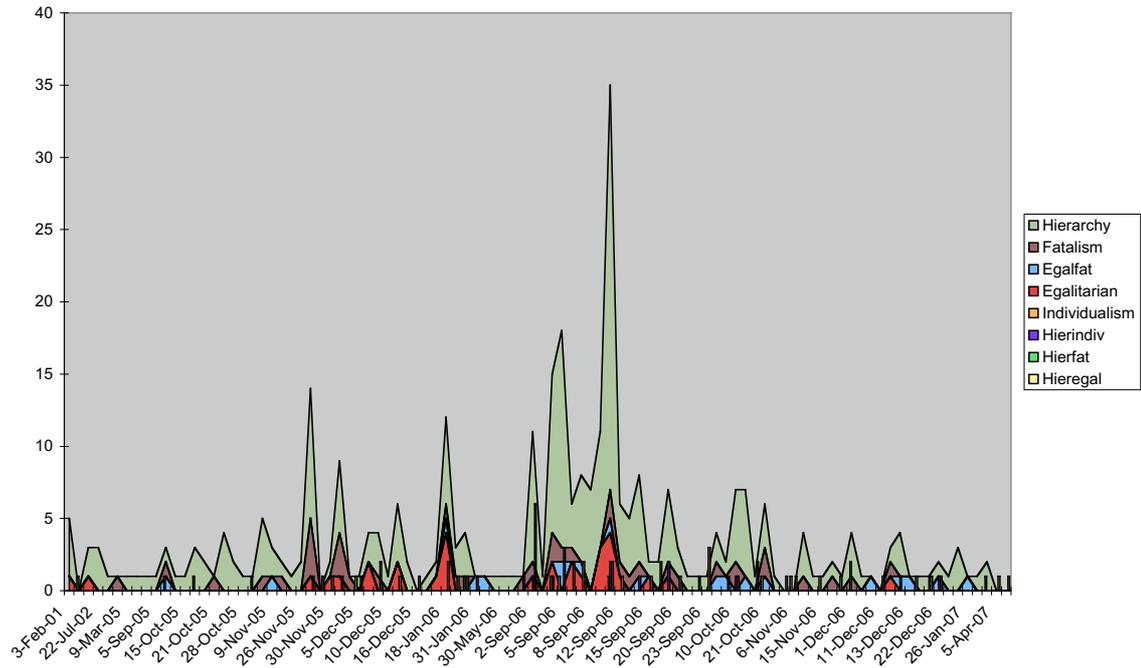
Looking first at the broad patterns of argumentation over *Gammelfleisch*, there appears to be support for the central claims of cultural theory – all four worldviews as well as some (but not all possible) hybrids are present.

Table 2: Frequencies

Type	Frequency	Percent
HE	6	1.46
HF	11	2.68
HI	12	2.93
EF	19	4.63
E	31	7.56
F	39	9.51
I	49	11.95
H	243	59.27
Total	410	100

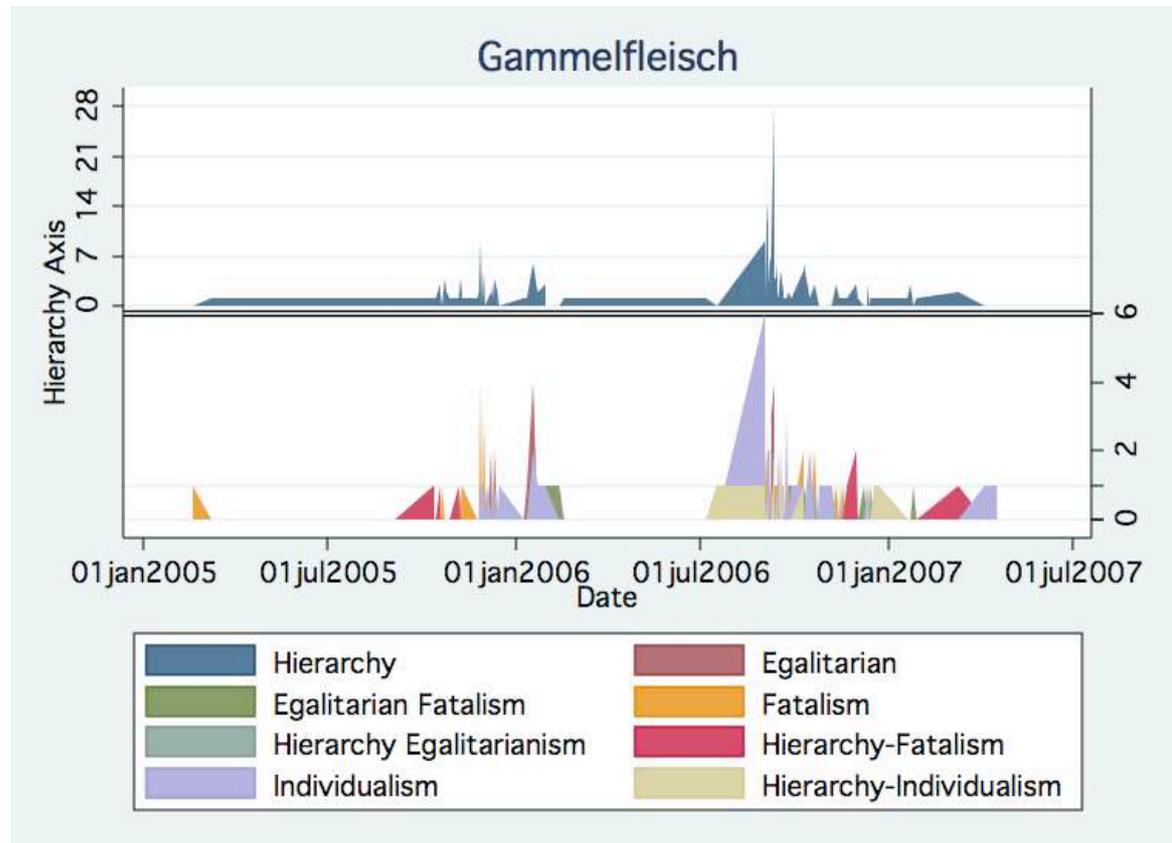
Table 2 shows that, in terms of frequencies, there is a clear dominance of hierarchy within the overall set of claims, amounting to nearly 60 percent, with the other three ‘pure’ worldviews being relatively close to each other. The choice of ‘whistleblower’ as a fatalist argument is decisive for the ranking among these three other pure worldviews as it represents 24 of the total of 39 fatalist arguments. In addition, hierarchy also is prominent among hybrid arguments. Figure 2 illustrates that hierarchy not only dominates in total number of claims, but it dominates argumentation over time, especially during the two ‘peaks’ of issue attention in late 2005 and September 2006, thereby lending some support to C6.

Figure 2: Claims over time



Such overall presentations are helpful in putting the whole set of arguments in context. However, hierarchy is one aspect of particular interest in this paper. In order to look beneath the surface, Figure 3 provides for a more detailed look at argumentation dynamics. First, it concentrates on the time period 2005-2007 and divides hierarchical from other arguments (note the different scales).

Figure 3: Claims over time



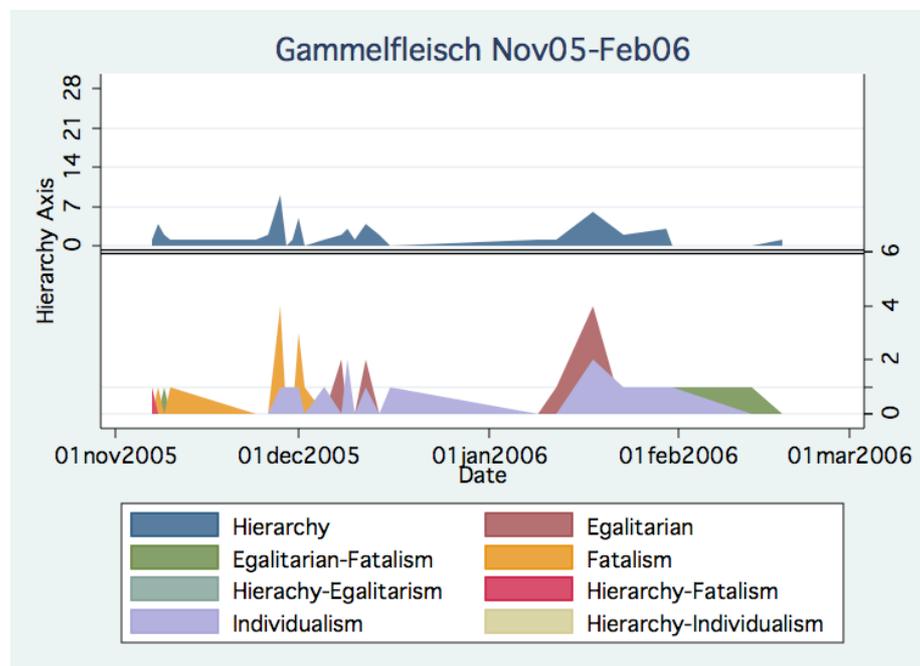
Figures 2 and 3 (as well as the frequency distribution) lend great support to C1, all 'pure' worldviews are present. These vary between fatalist approaches that advocate random or surprise inspections or those pointing to the pointlessness of control initiatives in light of low price competition and capitalist market forces, egalitarian approaches demanding higher professional standards for food inspectors and information exchange, hierarchist approaches advocating higher probabilities of detection and tougher sanctions, better regulatory 'techniques' as well as a strengthening of federal competencies, while individualist arguments were characterized by rejection of regulatory interventions, demands for enhanced consumer transparency via product and inspection information or calls for self-regulation. Figure 3 also again shows the dominance of hierarchical claims across the chosen time period, with the second cycle of *Gammelfleisch* of September 2006 being far more dramatic in terms of causing argumentation. Also noticeable is the rise in individualism over time, especially during the summer 2006 (as well as hierarchy-individualism related hybrids). Finally, these figures further lend support to C6, namely that the perception of crisis and scandal provoke an immediate outbreak of 'hierarchy' that then fades away.

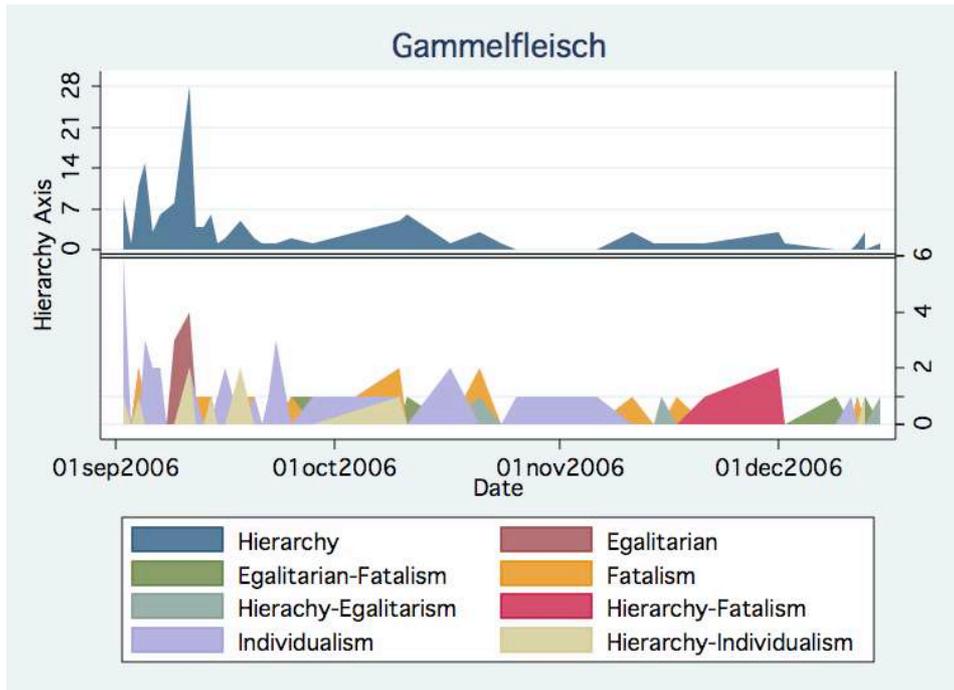
In order to investigate more closely whether there has been an institutional recycling of arguments over 'life cycles' (C4), Figures 4 and 5 provide a comparison across the two episodes of *Gammelfleisch* in late 2005 and mid-2006. Patterns during the various meat-related incidents do not reveal a continuous

recycling of arguments. Instead, the second ‘wave’ of September 2006 provides for more diversity and more argumentation – suggesting a ‘softening up’ of the regulatory regime to contestation from various worldviews rather than a recurring ‘recycling’. The varied nature – for example, the increased presence of fatalism in the second episode - may have something to do with the different ‘problem definition’ between the two cases (K3 versus the problem of controlling vast coolhouses). While there is a growth in individualist claims, this growth goes hand in hand with a more diverse mix of alternative claims. In other words, there is a decline in egalitarian claims (which had equal status in the first period) and an increase in fatalist and hierarchist-fatalist claims.

These patterns suggest that C4 (the life cycle argument) can be rejected, while some support may be seen for C5 (staged retreat), namely that a more diverse argumentation pattern may reflect a more vulnerable and contested policy domain. It is also noticeable that hierarchy and hierarchy-individualist claims decline sharply following the agreement between federal and Land governments in September 2006. Subsequent discoveries of putrid meat trigger a ‘hierarchist-fatalist’ response. At the same time, the relative absence of egalitarian arguments could be seen as a defeat of traditional administrative arguments in the German context, where mutuality in policy domains is traditionally seen as a central component for a functioning multi-layered, co-operative federal political-administrative system. Without wishing to make this point too forcefully, the lack of egalitarianism and the rise of individualism over time could be interpreted as some evidence for an existing retreat from traditional understandings of control.

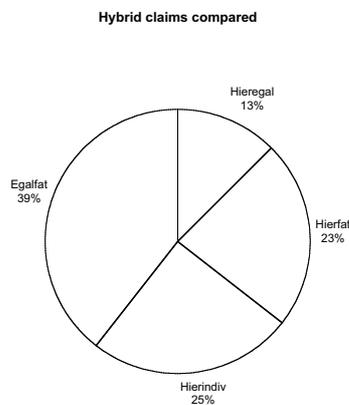
Figures 4 and 5: Contrasting two episodes of *Gammelfleisch*





C3 assumed that hybrids were part of a political calculus to establish coalitions across worldviews. If this assumption is correct, then the small amount of hybrid-type claims is surprising. Of course, this could be related to coding. Nevertheless, there is some support for C3’s underlying assumption, namely that hybrids emerge during time of high issue attention, i.e. during those moments where the domain ‘enjoys’ high public attention. Hybrids fade into insignificance once the initial ‘outrage’ is over. However, as the number of coded hybrids is low, this finding should not be over-interpreted. Figure 6 shows that it is egalitarian-fatalist claims that are dominant overall, in particular this relates to the suggestion that the problem of meat control is due to issues of price competition in a highly competitive retail environment. It is also notable that the distribution of hierarchy-related hybrids follows the order of ‘pure worldviews’, again suggesting that egalitarian themes were surprisingly (for the German context) neglected in comparison to other claims.

Figure 6: Hybrid claims



In conclusion, therefore, the overall argumentation patterns follow the predictions of cultural theory to a considerable extent (and therefore also C1). There is also strong support for C6. At the same time, the relative small number of ‘hybrid’ claims comes somewhat as a surprise for C3, but could be explained away by, for example, the ‘evocative’ nature of the *Gammelfleisch* episode. Institutionally-driven recycling of arguments, as predicted by C4, does not seem to have taken place when considering the evolution of non-hierarchical arguments.

Dominance of hierarchy and ‘blame shifting’?

As noted, one of the widespread perceptions of the German politics-style ‘blame games’ is the exploitation of frustration regarding the shared responsibilities between Land- and federal-levels of government. If the current fashion in studying blame management is to be believed, then we should find a dominance of such claims within our set of hierarchical arguments. We therefore explore in this section hierarchical sub-claims, first by looking at their distribution over time, and then by looking more closely at two central actors whose primary incentive should have been to play the ‘blame game’. If we don’t find the blame game there, then C7 should be regarded as particularly weak.¹² In our analysis we are over-inclusive, as some actors may find the distribution between Land and federal governments inherently dysfunctional without wishing to contribute to political ‘blame games’. Therefore, a small number of claims could be regarded as particularly damaging for those who see blame everywhere.

Figure 8 suggests that ‘multi-level claims’ (and therefore the blame game) are certainly present (20 per cent of all pure hierarchy-claims) over time (i.e. over the whole time period under consideration in this paper), however, it is far from dominant. Arguments stressing the importance of ‘better control instruments’ (‘technical fix) and ‘tighter oversight’ outweigh the number of claims based on multi-level governance problems considerably. Other hierarchy sub-types play relatively negligible roles. Figure 9 also illustrates this pattern during the main *Gammelfleisch* episode. Across time, ‘oversight’ is far more dominant, driving the peak-shape pattern of the overall hierarchical claims in Figures 1 and 2. Multi-level claims (called H6) are certainly present and also peak during the immediate ‘outbreak’, but a similar pattern can be seen with claims demanding tougher sanctions (H11). It is also noticeable that multi-level related claims virtually disappear following the agreement between federal and Land governments in early September 2006 – if blame was such an important motive, one could have expected to see some ‘cheating’ on the agreement by voicing criticism. In other words, the blame game does not drive the hierarchical argument, neither overall nor at specific times.

¹² As noted above, C7 should not be seen as a test of cultural theory, but rather the utilization of cultural theory to investigate complimentary literatures.

Figure 8: Distribution of H-sub-claims

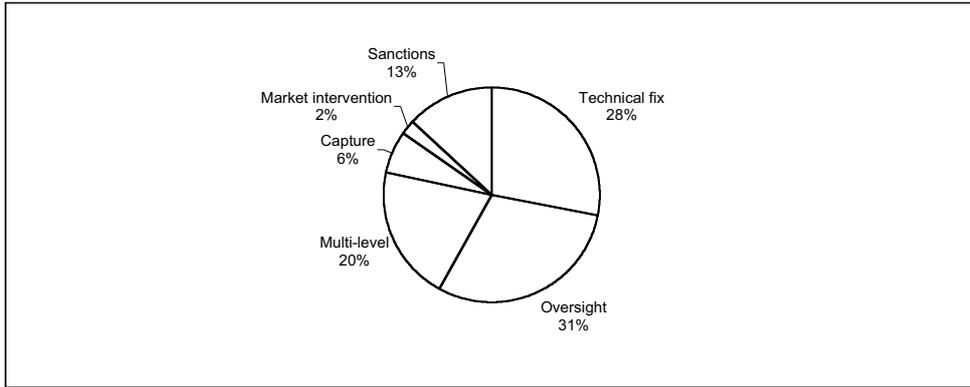
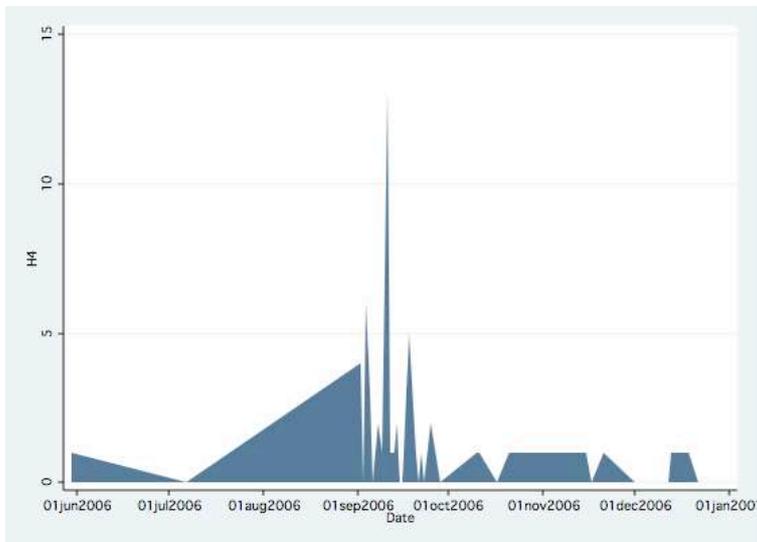
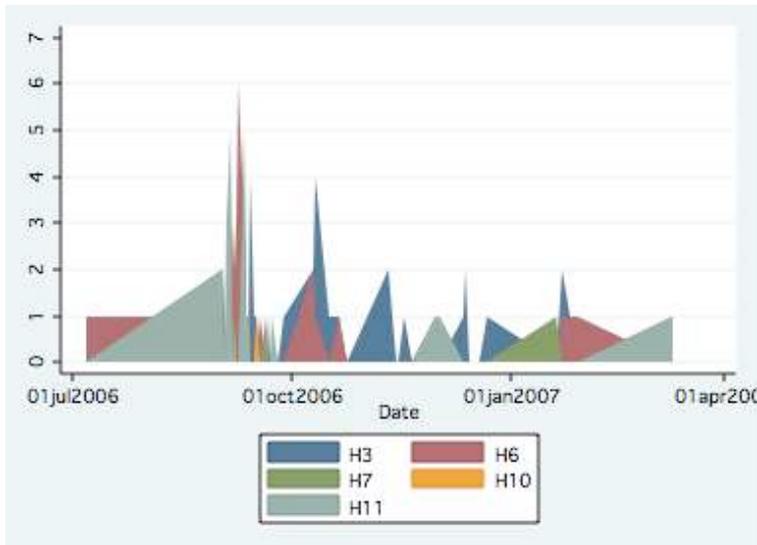
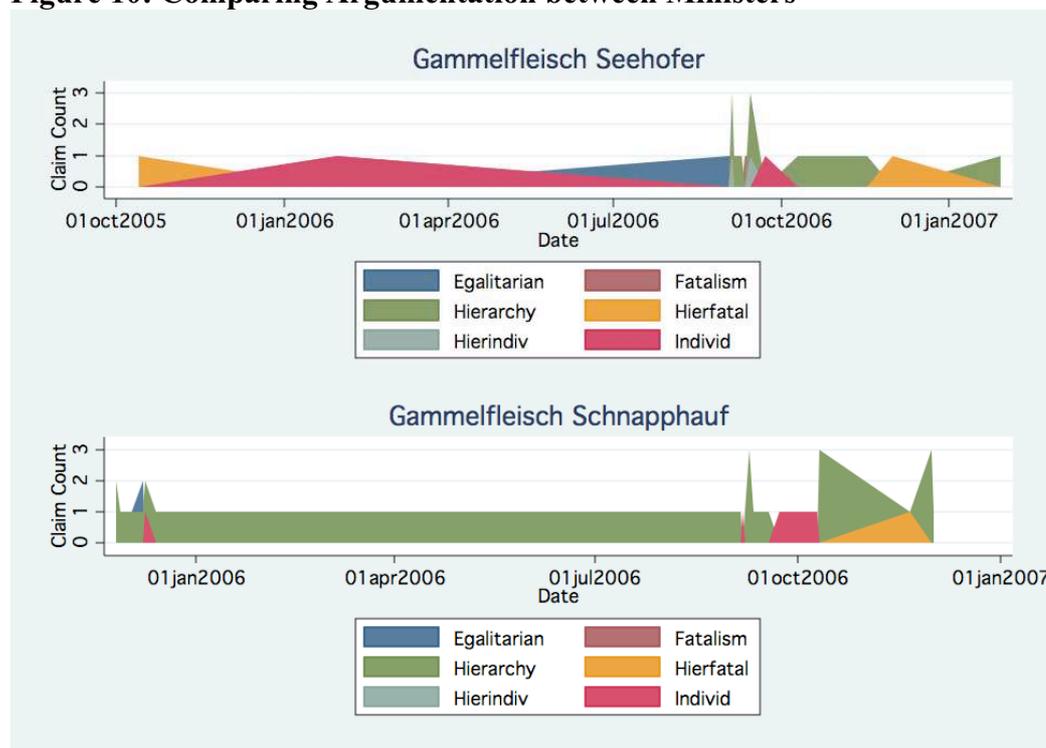


Figure 9: Comparing hierarchy sub-claims over time



Focusing on the two actors who can be assumed to be primarily interested in a blame game (and interviews held at the time supported this assumption) offers a more differentiated perspective on the utilization of different arguments. Figure 10 illustrates the arguments made by federal agriculture and consumer affairs minister, Seehofer, and contrasts these with his ‘nemesis’ in Bavaria, Schnappauf. Given the small-number of observations, some caution needs to be exercised when interpreting these area graphs, but it appears from Figure 10 that the actor who should have been most interested in exploiting public outrage through ‘blame management’ via multi-level government related claims, federal minister Seehofer was not dominantly utilizing such a hierarchical structure, but drew on a variety of worldviews. This might be interpreted as hunting around for potential coalition partners. However, the displayed patterns also do not offer a rejection of C7, as hierarchy emerges as the dominant pattern during the second, and main, *Gammelfleisch* episode during late September 2006. Schnappauf, in contrast, resorts to a more limited set of claims, mostly of a hierarchical kind.

Figure 10: Comparing Argumentation between Ministers



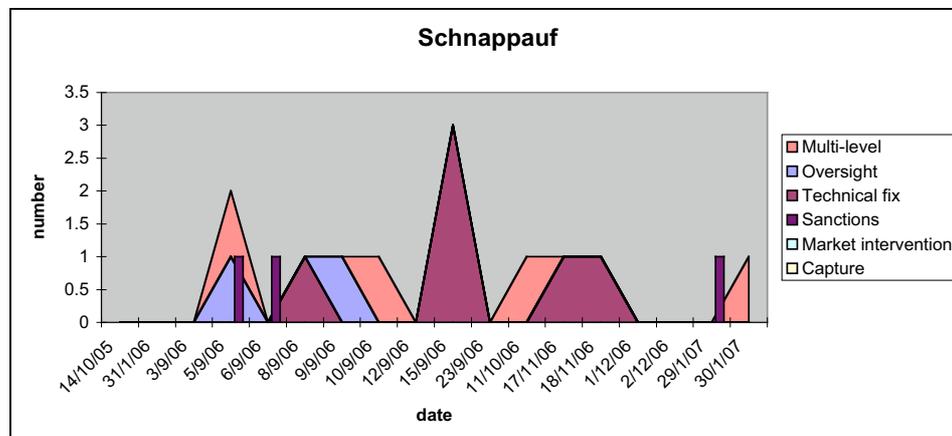
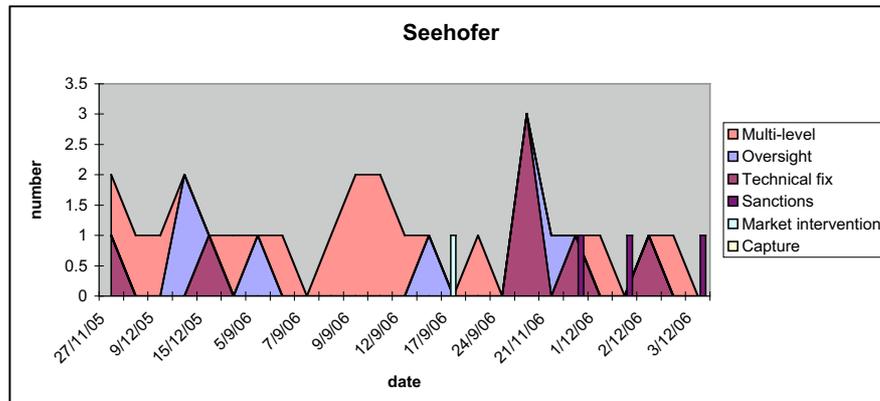
Cutting the data more finely reveals a more refined picture. Figure 11 concentrates solely on the H sub-claims made by the two consumer ministers. It suggests a dominance of ‘multi-level’ related claims in the case of federal minister Seehofer once he utilizes hierarchy-related arguments. Again, however, these claims can be separated between ‘direct’ blame-allocating claims, accusing Land governments of insufficient enthusiasm in terms of their enforcement activities, and those arguments advocating enhanced federal competencies for food inspections. In this latter mode, Seehofer takes on the appearance of a ‘policy entrepreneur’, seeking to

exploit this ‘window of opportunity’ to set the agenda with proposals. Equally, this could be interpreted, given the limited constitutional authority of the federal government in this domain, as an attempt at symbolic politics and credit-claiming. Following the agreement with the Land governments, Seehofer’s arguments become more interested in demanding better ‘technical fixes’ and oversight activities, despite some continued multi-level arguments (that however decline in their prominence).

In contrast to the federal minister, Schnappauf’s arguments mostly build on the need for ‘technical fixes’ (such as enhanced ‘task forces’) and some defensive multi-level arguments (denying the utility of an extension of federal authority and suggesting extended EU-level provisions). Linked to his hierarchist-fatalist argument (visible in Figure 10) that controls are inherently failure-prone¹³, Schnappauf appears as a hierarchist whose primary concern is to deny the potential existence of a Land-federal solution that could advance meat safety by concentrating on other hierarchical arguments. His fatalist arguments reflect those of civil servants in the policy domain, stressing the inherent imperfection of any control activity when faced with a large universe of control objects and non-cooperative behaviour among the regulated. In sum, while this section finds mixed support for C7, it does not establish a dominance argumentation pattern that would suggest that ‘blame’ is the sole or at least dominant concern in arguing about meat safety, even among two politicians whose motives and opportunities should encourage them to do so.

¹³ ‘Man kann nicht jedes Steak kontrollieren’ (it is impossible to control every steak).

Figure 11 Comparing ministerial argumentation



Does institutional change follow argumentation?

Finally, this discussion returns to the claim made in C2 - that institutional arrangements reflect and react to dominant worldviews - and the claim made in C5- that institutions change over time under sustained pressure in a staged retreat fashion. The claims can be investigated at the broad policy level as well as the more detailed institutional level, namely the evolution of discussions regarding the intergovernmental agreement regulating inspections, the AVV Rüb (noted above).

As discussed at the outset, the overall policy domain moved since the late 1990s towards a regulatory regime that emphasizes hierarchical-individual themes of risk-based regulation. The institutional change that occurred in German food safety supported this EU-driven process, directly through change in food safety regulation and administration, and also indirectly by the increasing acceptance of such approaches and of ‘consumer transparency’ as animating policy idea. In that sense, domestic institutions adjusted to a changing European legal habitat. The direction of institutional change was supported by the shift in worldviews as expressed through argumentation concerning *Gammelfleisch*. While there was a continued demand for hierarchical (and thus ‘state’) control, the discourse and institutional

arrangements increasingly reflected an endorsement of individualist themes, namely measures such as consumer protection law, industry self-certification schemes and 'quality management'. In that sense, dynamics in argumentation could be seen as adding legitimacy to regulatory changes that were ongoing in any case. In other words, the analysis cannot be stretched to suggest that argumentation (and therefore the mechanisms underlying C2) caused institutional choice, institutional change went in the same direction as dominant worldviews. In addition, there were also further developments that added to this perception of a growing legitimacy of individualist themes, for example, the growing acceptance given and attention paid to 'consumer safety benchmarking leagues' generated by consumer associations. This interpretation is supported by interviewees from federal and Land ministries; the widely shared view on *Gammelfleisch* was that that particular incident was little else than a 'feeding frenzy' by the media, animating by the 'evocative term' *Gammelfleisch*. However, the incident nevertheless provided 'tailwind' for advancing the implementation of internal administrative and regulatory reforms around the idea of risk-based regulation and wider moves towards a more individualist-blend of regulatory control.

Beyond this broad level of institutional choice, the same argument can also be made for developments at the intergovernmental regulatory level, the AVV Rüb. As intergovernmental provision initiated by the federal consumer ministry, it required agreement among a majority of Land governments in the Bundesrat (the second legislative chamber representing Land executives). At the time of writing, further changes to the initial AVV Rüb of 2004 were under discussion – as a direct result of the initial 13-points plan of September 2006. Discussions regarding amendments were framed by hierarchist-individualist themes, namely an emphasis on the strengthening of risk-based regulation at the Land level, backed by the introduction of federal-wide risk classification schemes applicable for inspecting food and animal feed businesses (to allow for a 'level playing field' across Germany in terms of inspection intensity).

Unsurprisingly, given our diagnosis of a 'softening up' of argumentation over time (see Figure 5), control elements related to other worldviews were also discussed, but, again unsurprisingly in the context of grid-group cultural theory, more controversially (as they did not fit the dominant hierarchy-individualist pattern). These included proposals such as emphasising further the importance of unannounced inspections and staff rotation among inspectors (reflecting fatalist arguments) as well as the 'four eyes principle' as an essential aspect of inspections (reflecting hierarchist-egalitarian views). Similarly contested were proposals relating to the hierarchist argument that received most 'claims', namely proposals demanding 'better controls' and, especially when they also hit on the distribution of power between federal and Land governments. As a consequence, the involvement of the federal ministry in running a quality management system was contested largely due to potential implications on the 'balance of power' between federal and Land governments. Similar conflicts existed regarding the idea of an 'early warning system', with Land ministries generally being hostile towards the idea, arguing (in egalitarian fashion) that information flows were already operating within the 'professional communities' sitting in the various Land authorities in order to dispute the federal ministry's interest in developing a federal wide database, linked

to the harmonization of reporting requirements by Land governments (and hence oversight by the federal ministry).

Overall, therefore, the changes in the AVV Rüb reflected an incremental adaptation of the German administrative system to the idea of risk-based regulation as well as a tighter regulation of the organization and practice of control. Whilst the degree and speed of changes reflected institutional starting positions (in particular the federal-Land division of labour and the dominant hierarchy-cum-egalitarian approach to control at the front line), this development at the institutional level (even if, at the time of writing, these changes were still being discussed) lends somewhat stronger support to C5 (staged retreat) and C2 (choices mirroring dominant worldviews) than to C4 (recycling).

Conclusion

This conclusion seeks to do three things. First, it summarizes the findings. Second, it discusses what the cultural theory lens has added to our understanding of *Gammelfleisch* as a specific policy episode, and more importantly, to our understanding of control in the context of German public administration. Third, and finally, we discuss the potential contribution that this analysis can make in order to take forward the debate regarding cultural theory as a potential mainstream framework for public policy analysis.

Turning to our findings first, Table 3 provides an indication of how the various claims performed in the case of *Gammelfleisch*. In general, they support considerable support for the central claims of grid-group cultural theory and they also offer some support for related analytical claims. It was not the aim of this paper to reject or confirm cultural theory against other theoretical/analytical frameworks (see Ostrom & Ostrom 1997), but to suggest a way in which such an endeavour could be undertaken.

Table 3: Summary of findings

Claim	Support
All four worldviews represented	Yes (clear dominance of hierarchy)
Institutional change reactive to dominant worldviews	Some support
Actors put forward hybrids to build coalitions	Low-limited support
Institution filter and recycle argumentation cycles	No
Institutional change follows staged retreat pattern	Some support
Crisis provokes hierarchy that then fades away	Yes
Blame games dominate	No

What does this paper say about Germany’s system of public administration/ executive government? The first insight is that despite the diagnosed prominence of hierarchy, the absence of the ‘traditional’ ‘hierarchy/egalitarianism’ hybrid requires further investigation, both across sectors and over a longer time-period – in its most extreme form, the conclusion of this study could be seen as the ‘death’ of the traditional understanding of German public administration as ‘co-operative’ at the expense of more ‘individualist’ (i.e. consumer sovereignty views). The second insight is that the ‘blame shift’ argument is far less universal than stereotype would

suggest. That is not to deny the prominence of argumentation related to blame games within the hierarchical type. While our analysis suggests that blame shift arguments are part of the usual ‘noise’ associated with such regulatory standards, the prominence of multi-level arguments was confined to the ‘peak period’ of the hierarchical argumentation in the aftermath of the scandal and to those individuals with foremost political interest in shifting/deflecting blame or pursuing institutional interests.

Turning to cultural theory, this paper has suggested that while there is general interest (or rejection) of cultural theory as an analytical device, its utilization in public policy related research has, as yet, not been a major industry. This paper aims to be of an explorative kind, seeking to develop claims that are either at the heart of this theoretical framework or complimentary to it, establishing a methodology through which to consider these claims in a non-casual way, and to offer an application (*Gammelfleisch*). The overall result is certainly not rejection of the theory, and indeed, there is some support of some key claims of cultural theory.¹⁴ While some of the findings mainly support widespread knowledge (if not stereotypes) concerning how ‘regulatory scandals’ are perceived in the media and how political actors react under these conditions, the analysis informed by cultural theory is able to reveal more nuanced shifts in how public argumentation changes in the medium term in the face of recurring regulatory failures. Further analysis needs to show that looking at patterns of public argumentation through the lenses of cultural theory does indeed inform policy analysis in a way that competing theories do not.

Starting from the position that grid-group cultural theory deserves more attention, this paper also sought to make a first methodological step towards giving effect to these ambitions. Much could be said about the weakness (i.e. lack of robustness) of the approach utilized here, given in particular the low number of claims in some categories, problems of coding bias that are arguably even more problematic than in other coding exercises (such as those for party manifestos) and of the ‘peaky’ nature of the area graphs. The natural next step would be to explore the methodology in cross-national and cross-sectoral analysis. Nevertheless, as this paper was supposed to be explorative, we conclude by suggesting that any analysis of control within government and by government could be greatly improved by taking up the insights of grid-group cultural theory, not only as a typology of instruments and policy strategies, but also as a set of underlying theoretical claims that require further investigation. Cultural theory shifts our attention to argumentation between worldviews and the *practice* of policy. Cultural theory’s central attraction lies in its interest in plural rationalities and how institutions are ‘lived’ and debated and its link to other analytical frameworks, but so far has not succeeded in moving beyond sectarian endorsements or broad typological applications. To take this step, this paper offers one suggestion on how to move discussion about grid-group cultural theory forward, as only advanced methodologies and rigorous evidence selection can establish its overall usefulness in the study of politics and public policy.

¹⁴ A critical reader might suggest that the key problem of cultural theory and of our analysis is one of lack of straightforward falsification.

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Appendix: Coding Frame

Hierarchy – command and control

- 1 - H3: inspection and technical fixes in control/oversight (include early warning system, more resources)
- 2 - H4: assertion of hierarchical control, hierarchical oversight (task force)/critique of absent hierarchical control
- 3 - H6: requirement for change in level of government responsible for control
- 4 - H7: corruption and capture
- 5 - H10: need for more intervention and regulation of the market
- 6 - H11: need for more deterrence and punishment

Fatalism – control through unpredictable processes

- 7 - F1: whistleblower
- 8 - F2: rotation
- 9 - F3: unannounced inspections
- 10 - F4: impossible job
- 11 - F5: powerlessness of individual consumer
- 12 - F6: problem mafia-type organization

Individualism – control through rivalry and choice

- 13 - I1: consumer/product transparency
- 14 - I2: naming and shaming
- 15 - I3: self-regulation by firms themselves
- 16 - I4: no intervention in markets/price signal
- 17 - I5: product recall
- 18 - I6: non-state actor controls

Egalitarianism – control through group processes

- 19 - E1: professional norms
- 20 - E2: local and decentralized economy
- 21 - E3: mutual information exchange
- 22 - E4: markets encourage cheating/dangers of naming and shaming strategy

Hierarchy and Fatalism

- 23 - H&F1 unannounced oversight/inspections
- 24 - H&F2 inevitable black sheep but overall system ok

Hierarchy & Individualism

- 25 - H&I1: increase in inspections financed by industry
- 26 - H&I2: regulated self-regulation
- 27 - H&I3: increase relational distance
- 28 - H&I4: penalties and transparency

Hierarchy & Egalitarianism

- 29 - H&E1: localized inspections
- 30 - H&E2: persuasion as enforcement strategy
- 31 - H&E3: distaste for individual punishment
- 32 - H&E4: controls revealed inherent problem

Egalitarianism & Fatalism

- 33 - E&F1: price competition (Aldi-sierung)