Policy Transfer and Resistance: Proposals for a New Research Agenda*

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The policy transfer literature has focused on the mechanisms of transfer, its networks and flows, agents and actors, epistemic communities and international organizations, but has generally neglected *resistance* to transfer. This neglect was perhaps understandable in the early days of the framework, when both Richard Rose and later Dolowitz and Marsh could almost casually observe that globalization and interdependence would naturally increase the amount of lesson-drawing and transfer activity. But it marks even current and more critical analyses of transfer – Peck and Theodore, in *Fast Policy*, refer to "sprawling networks" of transfer, its "intensity" and "velocity" and how it is so "profound and irreversible" that it renders "anachronistic the notion of independent, "domestic" decision-making" (Peck & Theodore, 2015: 3). This sense of inevitability of course has been tempered in various ways. Dolowitz and Marsh discussed the link between policy transfer and policy failure, arguing that transfer could be uninformed, incomplete, or inappropriate. They also noted that transfer could be voluntary as well as coerced, but paid more attention to the voluntary varieties than to the coercive ones. The more sociologically inclined students of transfer have argued that it involves "translation,"

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and that without appropriate conversion and reconfiguration, transferred policies will not adhere (or be accepted). As well, various case studies have pointed out the sometimes tortuous routes and obstacles that transfer agents must navigate – again, suggesting more deeply embedded dynamics of resistance in the transfer process, often rooted in institutional and cultural blockages (Common, 2013).

After the populist eruptions of 2016, it is time to take resistance to transfer more seriously, and to attempt to conceptualize it and bring it more directly and fruitfully into the transfer framework. This article is a brief attempt to sketch some of the factors that explain resistance to policy transfer. If the world from 1950 to roughly 2000 was a world of growing interdependence, borrowing, "catching up," promoting "best practice" models and sometimes imposing them as conditions for political and economic development, the world since 2000, and especially since the financial crisis of 2008, seems to be world of open resistance and rejection, if not contempt, for the "models" that have so confidently been peddled in the global policy transfer process. Transfer, borrowing, and diffusion of course continue, since governments need to solve common and shared problems and they will look to international lessons and examples, but the global flows are more complicated and choppy. They confront growing counter-dynamics of blockage, resistance, and even deep reversal.

In brief, we argue that the conventional policy transfer framework has five key assumptions:

1. Transfer is *instrumental*: It consists of techniques or policy instruments.

2. Transfer is *neutral*: Its consequences do not affect distributions of institutional power.

3. Transfer is *improvement*: Its results are about "betterment" or "improvement" with respect to the original policy problem.

4. Transfer channels *success*: It is grounded in causal models of "what works" and an epistemology of successful "lessons learned."

5. Transfer is *incremental*: It is a process of small changes, usually sector specific, without wider social implications.

We pose five counter propositions:

1. Transfer is often about – or is connected to – paradigm shifts. A carbon tax, for example, is not simply a tax, but reflects a policy paradigm about climate change.

2. Transfer may appear technical, but is often an assault, unwitting or deliberate, on existing configurations of institutional power. Improving the administration of a court system, for example, can upset the balance of power among magistrates and the legal community.

3. Transfer increasingly has been about austerities and disciplines, of "public bads" rather than "public goods." The EU's austerity measures against Greece are a case in point.

4. Transfer seems to be seeking inspiration from poisoned wells -- the EU, liberal democracy, modern capitalism. Each one of these has been failed in some spectacular ways in the last decade.

5. Transfer can appear as an innocuous accumulation of technical standards and techniques, but at some point can be perceived as an assault of "life worlds." The Brexiters' claim that they "wanted their Britain back" was a rejection of the EU's apparently technical regulatory regimes and its apparently ethically unobjectionable Europeanization project.

Rather than assume that transfer itself is unproblematic, and that the impediments and blockages are all on the side of the transfer target (e.g., cultural or institutional or strategic considerations), we first examine the assumptions underpinning the prevailing notions of transfer, and then explain why we should normally expect some measure of resistance. We will not over-theorize "resistance" here – it can be within state agencies, institutions, or social actors themselves – and we will not judge its normative character.

Assumption 1: Transfer is Instrumental

There is a wide range of the "what" that can potentially be transferred or diffused. A conventional way of imposing some order on this variety is to think in terms of layers or a rough hierarchy from the instrumental to the fundamental. Dolowitz and March identified eight categories: "policy goals, policy content, policy instruments, policy programs, institutions, ideologies, ideas and attitudes and negative lessons" (Dolowitz & Marsh, 2000: 12). They argued that it was important to "distinguish between policies, which are seen as broader statements of intention and which generally denote the direction policy-makers wish to take, and programs, which are the specific means of the course of action used to implement policies" (ibid). This is similar to Hall's classic distinction between settings (instruments), hierarchy of goals, and paradigms (Cairney & Weible, 2015; Hall, 1993, 2013). The same strategy is used in the advocacy coalition framework, distinguishing between deep core beliefs, near (policy) core, and secondary aspects (instruments) (Sabatier, 1993; Sabatier & Weible, 2007). These classifications clearly imply a difference between deep policy change -- paradigms – and more incidental policy change – instruments. Paradigms are wider and more encompassing, and more deeply embedded in institutions and practices, whereas instruments are more superficial and liable to change, and less institutionally anchored. A liberal versus a social democratic welfare state is a difference of paradigms, with clear institutional and ideational/attitudinal differences. The settings of a particular benefit (e.g., pensions) are incidental and easily adjusted.

The assumption underpinning this strategy of distinctions is that most policy instruments or tools could just as easily be used by one paradigmatic policy maker as they could by another – like hammers or drills, they are only distinguished by the "settings" that policy makers choose. If this is the case, and it is likely to be the case with most policy instruments, then the opposition or resistance to differential settings should be quite minimal. If a pension is increased or lowered by 1 per cent, it might generate some criticism and some opposition (in the case of cuts), but nothing systemic. The same should be true in most cases of transfer, if the transfer appears to consist simply of tools and instruments – e.g., conditional cash transfers, participatory budgeting, tobacco advertising bans, product standards, or regulations.

Our counter proposition is two-fold, one fairly banal but the other more substantive. The banal proposition is that a good deal of policy transfer is in fact not about instruments or tools, but about paradigms. If they involve paradigms, they must then involve substantial institutional changes, which in turn imply deep shifts in policy ideas/rationales, and configurations of power (more on this below). The best example is the European Union (EU) and its accession and neighbourhood policies. To accede to the EU, a country must accept the *acquis communautaire* with its thousands of provisions that cut across virtually every policy field and governmental activity. The possibility of this paradigmatic change with either Ukraine or Turkey eventually joining the EU has generated resistance both within the countries, and in the case of Ukraine, from Russia which feared that "transfer" would take Ukraine out of the Eurasian project. Other examples abound. In its heyday, the "Washington Consensus" was an attempt to transfer (often coercively through conditionalities) a suite of neo-liberal capitalist policies. Democratic transition in central and Eastern Europe, entangled with EU accession but with a broader agenda of transforming former communist states into liberal democratic and capitalist regimes, was another example of paradigm transfer (Carothers, 1996, 2002). Anti-corruption regimes (World Bank, IMF, and OECD), public health schemes (WHO), and most recently climate change policy, are all examples of attempted transfers of deep change, of paradigmatic shifts. Some social and political actors may welcome the transfers and be their champions within their respective domestic regimes, but it is naïve to assume that change this deep and broad will not generate resistance. A good deal of the current development literature is struggling with the puzzle of why, despite billions of dollars and years of effort, governance regimes in target states have not improved (Andrews, 2013; Pritchett, Woolcock, & Andrews, 2012). Brussels was shocked by Brexit and growing anti-EU populism. But we should expect resistance in the case of transfers that involve paradigm shifts. These shifts can disrupt institutions, and while they might create winners, they also create losers, and losers fight back

(Pal & Weaver, 2003; Trebilcock, 2014). The specifics of resistance are more complex – it can take time (a slow burn) for coalitions to form, to find leadership, and then erupt in opposition. Or it can be a long march through the institutions, passive resistance and programmatic sabotage. The point is that the transfer literature has almost entirely ignored this aspect of transfer because it has often ignored paradigm shift in favour of the transfer of policy tools and instruments.

This is our second point, somewhat less obvious: many policy tools are not purely instrumental or innocent of the policy paradigms from which they spring. Some tools, however innocuous and apparently technical, carry paradigmatic DNA. The example we used earlier was the carbon tax. In one sense, it is just another tax, and its "settings" can vary in terms of incidence, phase-in, and off-sets. It is often sold as simply a technical solution to emissions, and particularly with off-sets of other taxes would be revenue neutral and should make no difference to taxpayers. But the proponents of carbon taxes also justify them in terms of an impending global climate crisis, the need to transition to a low-carbon economy, and perhaps even to a completely different form of society and economy (Klein, 2014). It is easy to understand the resistance of communities to shutting down their coal plants and hence their livelihoods, but less easy to understand the visceral opposition to something as seemingly innocuous as a carbon tax. We can only understand that if we understand that some policy instruments are connected, and indeed expressive and symbolic of, major paradigm shifts and the embedded actions that come with their implementation. Accepting the small instrument is a slippery slope to paradigm change, and so big battles are fought over seemingly small stakes. Other examples include:

- Trade agreements (e.g., the Trans-Pacific Partnership or the Comprehensive Economic and Trade Agreement) may contain small changes to the tariff protection for specific industries (farmers) that generate out-sized resistance from those industries.
- Municipal bicycle lanes seem like just an accommodation for commuters who prefer to bike, but can be viewed as an "assault on the car."
- Raising the eligibility age for public pension benefits from 65 to 67 not only has major financial implications, but is also a paradigm shift in the sense of one's "working life."

The examples could be multiplied, but our point is that policy transfer often involves the conscious attempt to transfer entire "systems" or paradigms, and even in cases where the transfer appears to be technical or instrumental, those techniques and instruments retain trace elements of their anchoring paradigms. In both cases, since the changes are deep and wide, we should expect resistance.

Assumption 2: Transfer is Neutral

This assumption is twinned with the first. If transfer is mostly about tools and techniques, about instruments and their settings, it should have only technical and incidental effects. But if instruments and tools carry paradigmatic DNA, they are likely to have deeper institutional effects. Rather than neutral program techniques, they encapsulate configurations of power and project them into the changes they might trigger through the transfer process. As we noted above, the changes resulting from transfer can create winners and losers, and can potentially upset existing configurations of power. Those who lose through transfer will resist, block, or try to blunt it. An example is the transfer of rule of law and judicial reform in central and Eastern European countries as part of EU accession (Delpeuch & Vassileva, 2013). These reform packages were not simply technical changes to improve judicial efficiency. The rule of law has a specific institutional configuration of power that stems from historical struggles between the crown, Church, and parliaments in Europe, and indeed can be traced back to Roman law (Fukuyama, 2014). Transferring or injecting it into a different system with different traditions (particularly Soviet) will challenge the balance of interests embedded in institutions. In the case of rule of law and judicial reform in Bulgaria after it decided to join the EU in 1997, those reforms challenged the powers of prosecutors and magistrates. Transfer agents like USAID understood that, and worked to develop coalitions of legal professionals who would support the changes.

The case of Uber is another illustration of the power dynamics linked to transfer and diffusion. Uber is disruptive precisely because it overturns the taxi licensing and regulatory regimes that prevail in many countries/cities. Those regimes usually limit the number of licenses or plates, thereby restricting supply, and also closely regulate fares. Uber completely disrupts that model by providing a technological “hailing” platform that allows drivers and passengers to connect directly. The universal reaction of the taxi industry has been defensive, demanding policy responses that protect the existing configuration of its investments and economic power. The adoption of different regulatory models that in some measure accommodate Uber will inevitably be much more than the technical change of a regulatory regime. They will rebalance economic interests, creating new winners and losers.

Ironically, some transfer agents themselves have been more alive to this dimension of transfer than the literature itself has. According to Peck and Theodore, the World Bank "defanged" the models of participatory budgeting that it was promoting, precisely because the original models implied a degree of citizen participation and control over public spending that was inconsistent with the Bank's neoliberal agenda (Peck & Theodore, 2015). It understood the power implications of a budgetary technique. The OECD came to the same realization over a decade ago (Pal, 2012). In 2009, the Economics Department published a study on the political economy of reform (the policy transfer of neo-liberal economic programs and policies), and noted that the costs of reform are often incurred up-front and concentrated among specific groups. Another study, entitled *Making Reform Happen* (OECD, 2010) reviewed some of the most challenging areas of structural reform: opening markets to competition, pensions, tax reform, environmental policy, education, health, modernizing government, regulatory reform and fiscal consolidation. The problem faced by all governments in these areas was devising "strategies for securing adoption of such reforms that prevent the opponents of change from blocking reform, but that also address their legitimate concerns about its distributional consequences" (OECD, 2010: 13).

Assumption 3: Transfer is Improvement

If the conventional transfer literature has neglected the distributional impacts of transfer, and how these might trigger resistance among losers, this may be linked to a deeper assumption that most of the effects of transfer will be positive, that they will deliver improvements to policy problems. If we examine the tradition of "lesson-drawing" that stems from Rose's early work, it emphasized the "puzzling" behind policy, the search for answers and models that will "solve" a policy problem. Rose explicitly framed the international work of transfer agents as seeking to make things better in other countries by improving both their policies and their institutions. Other threads of literature that are not explicitly within the transfer framework but which speak its language, such as international development and good governance, unselfconsciously portray their work as improvements – democratization, anti-corruption, regulatory efficiency, service improvement, gender equity in the public service. These are all so self-evidently positive that it is not entirely surprising that the darker distributional impacts are sometimes minimized or ignored. These are transfers of "public goods." In the long run, they will benefit all citizens. There is mild and transitory pain, but for long-term gain. The entire framing of transfer is benign and beneficial, almost therapeutic.

The tonalities of transfer have audibly changed since the 2008 financial crisis. We may be in a different world, a world where a good deal of policy transfer is the transfer of austerities, of pain, of "public bads." This is not entirely new of course – there are legions of critics and a history of opposition to the Washington consensus, structural adjustment, and various imperialistic adventures by the United States in particular, particularly in South America. As well, if one looks closely at the policy transfer and best practice advice emanating from many international organizations in the past 20 years (that is, pre-dating the 2008 crisis), there is a deep, resonant and consistent chord that reform is necessary, but inevitably painful. We can use the OECD once again as an example, since its only real business is the encouragement of public sector and policy reforms. The OECD was established in 1961, and as a cheerleader and coordinator of both its member states and an increasingly widening orbit of observers and partners, it has witnessed and responded to multiple crisis, from the first OPEC oil embargoes in the 1970s, to the collapse of the Soviet Union in 1991, to the 2008 financial meltdown. Its constant theme has been the need for governments to adapt and continuously reform, improve agility through hard choices. Its models and practices glow with promise (the OECD's motto is "Better Policies for Better Lives"), but have a dark aura of discipline.

This is the other, darker side of transfer, the side that is often shrouded by the emphasis on transfer as improvement. In a sense, the 2008 financial crisis simply raised this enduring theme to a higher register and made it more audible. The transfer of austerity and discipline self-evidently creates losers, legions of them, and they are bound to resist. The imposition of various austerity regimes on Greece by the European Commission, IMF and European Central Bank, and the furious resistance by Greek governments and citizens to that imposition, is the most dramatic example of this transfer dynamic, but it has played itself out in various national public management reform strategies. (Andrews, 2011; Bozeman, 2010; Cepiku & Savignon, 2012; Pollitt, 2010). With the onset of the fiscal crisis, government response has been framed in terms of austerity measures and cutback management (Kickert, 2012). The pattern of responses has been analyzed, for example, in various special issues of journals that appeared in 2011-2012: *Public Organization Review* (2011, 11(1)), *Social Policy & Administration* (2011, 45(4)), *Governance* (2012 (25(1)), *International Journal of Public Sector Management* (2012, (25(6/7)).

The focus was on austerity techniques and their policy instruments (Cepiku & Savignon, 2012), with one literature review defining the typical concepts of "austerity management" as "austerity, budgets, budgetary process, cutbacks, compressing, decline, deficit, downsizing, downshifting, fiscal balance, fiscal stress, reallocating, retrenchment and slimming down" (Overmans & Noordegraaf, 2014: 100). As with the spread of NPM, research seems to show a variety of responses and policy mixes across countries (Lodge & Hood, 2012; Roberge & Jesuit, 2012), with strategic centralized priority-setting being the least palatable (Pollitt, 2010). But in all cases, public sector reform has involved austerity and discipline, the transfer, borrowing and learning of models of cut-backs and reductions, of the administration of pain. Ultimately, of course, these may lead to improvements and "better policies for better lives," but in the short term they are disruptive and in almost all cases will generate reaction and resistance. And no one actually believes that the "short-term" will be that short.

The lesson for transfer research from these examples is to make sharper and clearer distinctions about the distributional impacts of transfers. As an extension of the previous counter proposition, we should acknowledge that some policies will create winners and losers, even if they may be generally "beneficial." More pointedly, we should also understand that some policies have discipline and restraint at their core, and in that respect create almost nothing but losers – the winners are abstract categories (future generations; the planet). This sets up completely different dynamics of transfer, as well as of policy management.

Assumption 4: Transfer Channels Success

The logic of transfer as lesson-drawing is that lessons are indeed drawn – from best practices, from evident successes, from things that "work." Nobody wants to transfer failure. If we set aside for the moment the cases of coercive transfer and concentrate only on instances of voluntary transfer, we can posit several logics or patterns. Simmons, Dobbin & Garrett (2008b) identify four mechanisms of diffusion of market models – coercion, competition, policy learning, and emulation (we set aside coercion). *Competition* involves states adopting "market friendly" policies and institutions because they will make their markets attractive to investors. *Policy learning* is a mechanism whereby countries draw lessons, based on observation and rational assessment of efficacy, from other countries' experiences, and then apply those experiences in their own context. *Emulation* is a mechanism of diffusion drawn from sociological research that emphasizes that borrowing takes place within a shared set of meanings as to appropriate social actors, societal goals, and the means for achieving those goals. As they argue: "While policymakers see themselves as collectively trying to divine the 'best practice' in each policy area, and see policy as evolving toward more and more effective forms, in fact policy-makers are seldom able to judge whether a popular new policy improves upon the status quo" (Simmons, Dobbin, & Garrett, 2008a: 32). Emulation relies on voluntary adoption of new policies in a context where "followers" typically are ready to copy the example of countries or IGOs considered to be "leading". Emulation has a strong element of bounded rationality – policymakers cannot really be certain about the empirical efficacy of many policies – so they make the best guesses that they can, but also take their cues from who is defined as "leading" and what is defined as a "best" practice.

Another well-known logic is institutional isomorphism. DiMaggio and Powell (1983) identify three mechanisms of institutional isomorphism – coercive, mimetic, and normative. Coercive isomorphism occurs in instances where organizations are dependent on other organizations or subject to their rules. This helps us explain isomorphism at the national level, but with respect to isomorphism across national boundaries – global convergence around certain models – mimetic and normative isomorphism hold more explanatory potential. Mimetic isomorphism occurs in conditions of uncertainty and goal ambiguity, inducing new organizations to search for "models" or "best practices." This can be informal and even ritualistic and, ironically, a way of proving innovation: "Organizations tend to model themselves after similar organizations in their field that they perceive to be more legitimate or successful. The ubiquity of certain kinds of structural arrangements can more likely be credited to the universality of mimetic processes than to any concrete evidence that the adopted models enhance efficiency" (DiMaggio & Powell, 1983: 152). Normative isomorphism is most characteristic of professionalization at the organizational level. Professionalization of a field depends on the development of its "cognitive base" and the "growth and elaboration of professional networks that span organizations and across which new models diffuse rapidly" (DiMaggio & Powell, 1983: 152). It can be extended as a model however, of more generic borrowing because of the acceptance of practices in a "field" such as NPM.

These two approaches or logics differ in scale, of course, with institutional isomorphism focused more on organizations and professions, but the logic of borrowing, learning, and transfer is the same in both: the transfer occurs because something is perceived to "work" (competition, learning, mimetic isomorphism) or because it is normatively supported as "best practice" (emulation, normative isomorphism) in a field of practices. This suggests something that is underestimated in transfer research – a wider backdrop or context of broad "systems" that seem to work and are therefore worthy of emulation. The *specific* borrowings or lessons are drawn against that backdrop. For the last few decades it has been taken for granted – even with some debates and fierce criticisms – that liberal democracy and modern capitalism are successful paradigms (we could possibly add the EU project as another). Each of these has been shaken to the core in the last decade. Perhaps more precisely, certain key aspects of each have been challenged if not rejected. If liberal democracy is associated with a high-spending and heavily regulatory welfare state, open borders, high immigration, and cosmopolitanism, then this package is being challenged. If modern capitalism is associated with globalization, free trade, off-shoring, and income inequality, then this package is also being challenged.

Combined, these developments provoke two types of resistances which are relevant for policy transfer. One is the resistance of some national elites to both the models themselves, and the prescriptions that flow from them. Why should countries try to learn from Washington, when Washington is described by its own President as a swamp that needs draining? President Duterte of the Philippines openly called President Obama a "son of a whore" and EU members like the UK and France as "hypocrites" for their colonial pasts. It is not lost on other countries – Russia, for example – that the "West" holds itself out as a beacon of good governance while its leaders wrestle with corruption and police brutality (the US), rising anti-immigration sentiment (UK, France and Germany), fiscal chaos (Portugal, Italy, and Spain), and a general inability to stimulate economic growth. The second type of resistance, one that is channeled by politicians, is the resistance of electorates. The populism that has so bewildered commentators and observers during the US election and the Brexit referendum is a populism that seems to be rejecting *both* the shibboleths of conventional liberal democracy and of contemporary capitalism, a revolt against elites (Hochschild, 2016; Judis, 2016; Müller, 2016). National moods are swinging towards autarchy, borders and blockages, for "going-it-alone" strategies in a more turbulent world.

The lesson for transfer research is not that policy transfer will necessarily diminish, or that lesson-drawing will disappear. It is that, first, there might be more widespread and deeper resistance to any policy transfers that naively assume the legitimacy of the conventional political and economic paradigms of the past. Try saying "multiculturalism" in Germany or France; try proclaiming the benefits of free trade in Wallonia. Second, with the de-legitimization of the conventional policy systems and of their national exemplars (the US and the leading EU members), we should expect new exemplars or sources of transfer ideas. The best candidates are think thanks, foundations, public sector consulting firms, and various academic institutes or research centres. These will have the reputational capital of objectivity and some evidentiary basis for their recommendations. Some types of international organizations that are more research based (the OECD is a leading example), or more technically oriented in the regulatory field, might also qualify. A third lesson is that transfer dynamics in the future may be less global than regional, or along new vectors (less state-to-state transmission and more a mixture of market, non government and state engagement in transfers). Policy transfer in the Eurasian space, for example, may be led by Russia as the regional hegemon. In Asia, it might be a combination of, or competition between, China and Japan. There might be more exchange among Lusophone countries (some 250 million native speakers). Overall, there may be less West/North to South transfer, and more South-to-South transfer. All point to a different context for policy transfer from the past; that invisible lubricant – a general and even unconscious acceptance of systemic political and economic paradigms – can no longer be taken for granted.

Assumption 5: Transfer is Incremental

Let's assume for the moment that each of the conventional assumptions about policy transfer discussed to this point is correct – (1) it is typically technical, about mere instruments; (2) it has no major distributional effects; (3) it actually addresses policy problems and makes things "better"; (4) it borrows from successful models and best practices. We can set our counter propositions aside. The final assumption in the conventional policy transfer literature is that transfer is incremental, normally the borrowing of tools and techniques that make small-ish changes in specific policy sectors. We can take the case studies from a recent collection on policy transfer as an illustration (Hadjiisky, Pal, & Walker, 2017): court system reform; trucking regulation; tobacco advertising; farming techniques; food safety standards; participatory budgeting; trade union regulation. To be fair, most of these case studies identify the translations and modifications in the transfer process, and indeed some of the resistances that arise. But our point here is that almost all research on policy transfer is sector specific, and is usually at the level (to use Hall's terminology), of settings and goals, rather than paradigms. In public management reform and the spread of NPM, it deals with public sector organization and processes, and the transfer of techniques like accrual budgeting, contracting out, de-agentification, and performance pay (Pollitt & Bouckaert, 2011; Van de Walle & Groeneveld, 2016). This is a fairly broad policy sector, and has been the focus of significant research, often with the finding that the spread has been variable and uneven at best, and usually blocked by the path dependencies of administrative cultures and institutional rigidities (Christensen & Laegreid, 2011; Margetts, 6, & Hood, 2010).

Our counter proposition imports an argument made earlier that a good deal of policy transfer is not simply about tools and instruments, but about paradigms, and even if they seem to be just about tools, the tools themselves resonate with the paradigms from which they spring. Our example was the carbon tax. But let's take this one step further. Let's assume three distinct policy fields (they can be quite disconnected – health care, trucking regulation, and immigration, for example) – *Sector A, Sector B, Sector C.* Now let's assume a slow drizzle of successful transfers in each sector, transfers of instruments that should have no connection to each other (e.g., health billing methods, truck lengths, refugee determination) – *Sector A* (x^a, y^a, $z^a \ldots n^a$), *Sector B* (x^b, y^b, $z^b \ldots n^b$), *Sector C* (x^c, y^c, $z^c \ldots n^c$). The conventional assumption, since these are different sectors with different transfers, is that any "accumulation of transfers" occurs only within that sector, and indeed that the accumulation itself is normally distributed and only rarely amounts to a phase shift or paradigm change. Again, the example of NPM is instructive, precisely because it has a wider scope (potentially the entire public sector), and a more clearly defined set of elements. Pollitt and Bouckaert (2011) nicely summarize this array as a "menu," and point out that transfer recipients were more likely to mix and match offerings from that menu that to adopt the NPM paradigm (or variants) as a whole. But even their analysis, and much of the work on the transfer and diffusion of public management practices, assumes that while major institutional changes might occur (say, in previously communist regimes) that these changes were still contained within the state sector.

If we relax the assumption that the sectors are siloed, and at the same time relax the assumption that the drizzle of transfers is normally distributed (without tipping points or phase changes), we have the possibility of something more interesting and fundamental – the possibility (for resisters it will be seen as the "threat") of a fundamental transformation that is *cross-sectoral* and possibly even *societal*. How could this be? With respect to the policy sectors, even if they appear to be completely different realms, their practices may be seen (within the country) as some sort of expression of national character or national practice. An extreme example that demonstrates this dynamic with stark clarity, is the transformation underway in some Gulf states, particularly in Qatar (Tok, Alkhater, & Pal, 2016). The country now has the highest per capita GDP in the world, generated by vast natural gas reserves and a shrewd development of its LNG industry, making it the world's largest single LNG exporter. It has a native Qatari population of around 300,000 (with the ex-pat labour force, the total population is around 1.9 million). While it had developed its oil reserves starting in the 1950s, it was a relatively small player in OPEC, and its gargantuan gas revenues only began to flow in the mid-2000s. Since then, the country has been on a massive transformational experiment – the *Qatar National Vision 2030*'s goal is: "transforming Qatar into an advanced country by 2030, capable of sustaining its own development and providing for a high standard of living for all of its people for generations to come" (Qatar General Secretariat for Development Planning, 2008). The Vision has four pillars: human development, social development, economic development, and environmental development. These were elaborated in the Qatar National Development

Strategy which contained a summary of programs and projects within them: sustainable economic prosperity (20), human development (73), social development (51), environmental development (10), and developing modern public-sector institutions (16) (Qatar General Secretariat for Development Planning, 2011). This total of 170 projects was extraordinarily ambitious, given the even larger number of specific targets associated with all these projects. These projects have been joined by the blue whale of all development projects – the FIFA World Cup in 2022.

Qatar is undergoing this transformation in the space of one generation, in a country with a tiny Muslim population, that two generations ago was moderately wealthy but could remember its immediate past as a sleepy emirate that had (in the 1930s) depended on pearl fishing for its economy. The pace and scope of change is massive, and is based almost entirely on the transfer – importation – of western standards and practices in every policy realm. Obviously, this has generated debate about national character, Muslim practices, religion and ethics, the role of women and of the family. Policy transfer on this scale is more than the transfer of tools and instruments, and even more than the transfer of policy paradigms – it is a transfer of civilizational practices (the "West" if you will), and quite understandably the debate (and the resistance) has focused on the effects on what we might call the "life world" of Qataris, that connective tissue of norms and practices that make up the lived, everyday social environment. Of course, Qatar is an extreme example, but the idea that the apparently desiccated and technical contents of a policy sector can touch the "life-world" is evident in more developed and stable contexts. As an example, in Canada, agricultural subsidies through supply management (of milk, chickens, eggs, and turkeys) have been defended as protections of the “family farm.” Canadians also regard their health care system with almost religious reverence (partly because it’s better than the US), and see any challenges to the public sector monopoly model as an attack on what it means to be Canadian (Maioni, 2014).

If apparently disparate sectors can be connected and their practices seen as expressions of national character, we can add the point that the apparently disconnected drizzle of policy transfers may have (or be perceived to have) and underlying logic. How could the transfers expressed in *Sector A* $(x^a, y^a, z^a \ldots n^a)$ + *Sector B* $(x^b, y^b, z^b \ldots n^b)$ +*Sector C* $(x^c, y^c, z^c \ldots n^c)$ have anything in common? In the Qatar case, they are routinely framed as expressions of “the West.” Other “packages” have historically been abbreviated this way as well: the “Washington consensus”, “neo-liberalism”, “market friendly.” Seen this way of course, these packages are clearly being characterized by the logic of capitalism, a logic that cuts across policy sectors, and can become viral as it invades and disrupts both policy sectors and “life worlds” more broadly. The long history of resistance to market-oriented reforms (or transfers that can be characterized as nothing more than the invasion of heartless, capitalist principles) can be quite easily understood if we grasp the logic of transfer as non-incremental, potentially disruptive across sectors, and as an assault on “life worlds.” The otherwise (for elites) inexplicable Brexit vote (if we do not simply reduce it to “fear and anger”) makes sense as this type of resistance. For Brexiteers, the EU was a massive policy transfer machine, churning out endless directives and regulations that had an inner *EU logic* that ultimately was rending the fabric of British life (the “life world”) into something ‘not British’. As Nigel Farage, the then leader of the UK Independence Party, put it in his first speech to the European Parliament after the Brexit vote:

> The biggest problem you've got and the main reason the UK voted the way it did is because you have by stealth and deception, and without telling the truth to the rest of the peoples of Europe, you have imposed upon them a political union. …Because what the little people did, what the ordinary people did – what the people who'd been oppressed over the last few years who'd seen their living standards go down did – was they rejected the multinationals, they rejected the merchant banks, they rejected big politics and they said actually, we want our country back, we want our fishing waters back, we want our borders back.[†]

Conclusion

The counter propositions in this article are by no means a rejection of the policy transfer framework. It remains true – perhaps even more so today than when the framework was first developed – that domestic policy making is strongly influenced by external factors and actors. At minimum, there is the ineluctable global integration of transportation, communication, and economic and financial systems. Countries have to interact and (sometimes) cooperate around shared policy problems. The global canopy of international organizations, actors and networks has grown and thickened, and they very much remain in the transfer business. The simple logic of lesson-drawing and learning takes place daily for good, technical reasons – when confronted with policy problem, it makes sense to see what others have done, what seems to work and what mistakes to avoid. Understanding the dynamics of transfer are as important as ever.

[†] "Nigel Farage delivers first post-Brexit speech to the European Parliament," *The Independent*. Available at: http://www.independent.co.uk/news/uk/politics/nigel-farage-brexit-speech-european-parliament-full-transcript-text-a7107036.html

Our point has simply been that the *logic* of transfer is actually liable to generate more resistance (among elites, within institutions, and among populations) than has traditionally been acknowledged. The transfer literature has not been completely blind to this – obviously, it is rarely possible to take a policy or program from Country A and simply export it to Country B. To the extent that the transfer does appear to occur, or that a transfer process is underway, analysts have highlighted ways in which that transfer is mediated in some fashion (through institutions), or “translated” into a local policy dialect. There is of course a mountain of research on failed or blocked transfers, especially in the development field, but not normally within the policy transfer theoretical framework as such. So, despite the acknowledgement of the micro-dynamics of transfer and the translation or transformation that usually occurs, we argued that the core (often unstated) assumptions of the conventional policy transfer framework have conspired to underplay the dynamics of resistance.

From a research perspective, how would this affect research on policy transfer? Corralling some of the implications we drew above, and adding to them:

1. In describing the “what” of transfer, try to understand whether it is a policy instrument, a program, or a paradigm. Obviously, these are not easy distinctions to make (Daigneault, 2015), but if our argument is correct, then the paradigmatic quality of the item being transferred will be an independent variable explaining the degree and perhaps the type of resistance to it, and consequently the degree of success of the transfer. This point extends even in cases where the transfer is about something that seems obviously instrumental, technical or minor. Is there, as we put it, any “paradigmatic DNA” evident? Often we can understand otherwise apparent

over-reactions (resistance) to policy transfer as resistance to these trace elements, not the transfer itself.

2. Consider the potential distributional effects of a policy transfer. Are costs and benefits concentrated or dispersed? Who are the winners and losers? What resources do they have to support or oppose? Are transfer agents aware of the distributional implications, and does the transfer process reflect that awareness (i.e., loss mitigation strategies)?
3. Building on the second point, is the transfer a transfer of austerities, of cuts, of "public bads" in a broad sense? Research is showing that the policy dynamics of austerity measures differ dramatically from those of benefit expansion (Van Nispen & Scholten, 2016). Transfer studies should capture this.
4. Provide a better understanding of the systemic backdrop or context for transfer, of what is considered successful or prestigious enough to be emulated. Sometimes this is coerced – the clearest model was the bi-polar Cold War context where different countries "borrowed" from their respective hegemons. They rarely had a choice, and it was clear that there were competing systems and competing standards. Policy transfer studies came of age, coincidentally, during the period of US and Western hegemonic dominance, of neo-liberalism's finest hour. That hour is far past now, and we are back to a world of competing systems and models, and where there is more open disdain for both the economic benefits of contemporary capitalism/globalization, and even for the political benefits of liberal democracy/pluralism (Diamond, Plattner, & Walker, 2016; Legutko, 2016).

5. Transfer studies should adopt a longer view (similar to the advocacy coalition's "10 year" frame) and a more cross-sectoral one. What looks like an incremental process of transfer within a single policy sector may actually be part of a longer phase shift that coalesces across sectors into something much more significant. NPM reforms are a classic example – they were indeed a "menu" of choices from human resource management to performance budgeting, but the menu had a consistent gastronomical inspiration. The proponents of NPM were clearly dedicated to reform of the entire public sector, one reinvention at a time. It is precisely this long-term process of reform, coupled with its multi-sectoral ambition, that made it more than just transfer-as-usual, and which generated the significant resistance to it.

A final point is that if resistance to policy transfer is indeed to become a sharper theme in global policy making in the next years, then an emergent niche in the field should be the study of the techniques of resistance – how things get blocked and reversed will be as important as how things get translated and adopted.

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