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Deflecting the crisis of education: The COVID-19 pandemic as a missed moment of decisive intervention towards structural transformation

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Abstract

Crises bring about a potential to refocus policy debates and to catalyse decisive interventions (Hay, 1999) towards structural reforms. Comparing the political debates related to education in the COVID-19 pandemic in Hungary and Romania between March 2020 and July 2021, we explored the dynamics of the education policy discourse and how these political narratives approached educational and health-related inequalities brought forth by the crisis. By performing critical frame analysis (Dombos et al., 2012) on policy debates concerning crisis management in education, we show how the crisis first beheld the potential for decisive intervention and how this potential was deflected. The deflection of this potential reinforced the dominance of economic crisis framings that disregarded the educational and/or health needs of the most marginalised in both countries. Thus, the educational and health consequences of the pandemic for the most marginalised subjects in the educational systems were progressively rendered invisible in policy debates. The most marginalised subjects were socio-economically disadvantaged students with little or no access to digital learning infrastructures in Romania and teachers and educational workers with health risk conditions in Hungary. Deflection as a dual movement operated both as a social mechanism of inequitable burden redistribution of the consequences of the pandemic within education, and as a discursive mechanism reproducing the dominance of economic reasoning, limiting potential for transformative educational possibilities.

Keywords: *COVID-19, crisis, crisis management, policy frames, Central and Eastern Europe, equity, education*

1 Introduction

The onset of the COVID-19 pandemic brought about drastic restrictions in face-to-face education across the globe. These measures catalysed broader policy debates between government and non-governmental actors about the responsibilities of ensuring the preservation of the health of citizens and workers in education and equal access to quality education for all. However, several years after the pandemic, these concerns no longer take centre stage in policy debates, despite the potentially ravaging consequences of both the COVID-19 pandemic and crisis management policies for marginalised populations in education. In this paper, we trace the shifts in the policy debates concerning education by looking at how a moment of decisive intervention (Hay, 1999) towards structural transformation emerged and was then deflected, reinforcing dominant economic understandings of crisis and crisis management. Thus, the objective of our enquiry is to contribute to the literature on the transformation of the state during crises as well as to studies on the importance of and policy responses to social inequalities in major crises (Béland and Ramesh, 2022; Capano et al., 2022; Segatto et al., 2022).

While education research typically restricts its focus to the impact of COVID-19 pandemic within the education sector, the novelty of this study is that we aim to highlight the interdependence of the education sector with other policy domains and situate it within broader processes of state formation and crisis management. We do this by looking at how policy debates between non-governmental and government actors evolved during the first three waves of the COVID-19 pandemic in two Central and Eastern European countries, with a special focus on the normative justification of policy proposals and measures. We argue that akin to previous crises within capitalism (Hall et al., 2013, p. 310), the health and equity aspects of the COVID-19 pandemic have been initially timidly recognised publicly as a crisis affecting education, only for this potential to be deflected later on, causing the negative consequences of the pandemic in terms of educational equity and health to be displaced onto marginalised groups. In the two countries studied here, these were socio-economically disadvantaged students and teachers with health risk conditions. This deflection occurred through the circulation of crisis frames that have refocused the policy debate primarily around economic questions and diverted attention away from other crises affecting education.

2 Theoretical framework: Crises as opportunities for structural reform

Pivotal classical theories of Marx (1981), Gramsci (1971) and Habermas (1975) posited crises as critical conjunctures undermining the authority of the state and opening up the opportunity for change. As such, crises are read as 'moments of decisive intervention' (Hay, 1999) that hold the potential for structural transformation and more recently as significant learning moments that shape future processes of government (Jessop, 2018). Reading the COVID-19 pandemic as a crisis in education through the lens provided by this literature signals the possibility for structural transformation. However, recent empirical studies seem to disprove this argument. Discussing the effects of the COVID-19 pandemic on education policy in Landri (2025) has shown that treating this crisis as a 'tame' and not a 'wicked' issue enabled the government to return to previous forms of 'school normality' once the emergency context could be declared to be over and alternative ways of thinking about schooling and expertise soon disappeared. In the same vein on a more general note, Hogan et al. (2022) find that, in most cases, crises tend to be followed by policy continuity and do not result in significant policy shifts. Specifically, when studying post-pandemic education policy and delivery in selected European countries, Zancajo et al. (2022) find that long-term responses in most countries led to partial reforms or new investments in already running programmes and have not constituted path-departing policy change. However, while some collective and collaborative initiatives reorganised day to day schooling and social relations (Safta-Zecheria et al., 2021), these initiatives were mostly short-lived and the acceleration of digitalisation of education (Landri, 2021) became the main way forward. Digitalisation of education systems was a rapidly strengthening policy area before the pandemic. The pandemic served as a catalyst that accelerated pre-existing trends and amplified voices calling for the digitalisation of teaching and learning and teachers' digital training leading to problematic outcomes (West, 2025). These findings suggest that not all crises materialise into structural transformation and that questions of inequality are likely to be ignored in moving beyond initial crisis management measures.

Borrowing Gramsci's concept of catastrophic equilibria, Hay (1999) notes that in cases where there is no decisive intervention, even though crisis symptoms are apparent and widely recognised, crisis is not constructed in the political discourse and decisive interventions are not made. In this vein, Boin et al. (2020) suggest using the 'creeping crisis' concept. According to their definition, in contrast to 'fast-burning' crises, the threat of such slow-burning crises lurks in the background, may be recognised by certain experts or politicians, but for long fails to generate a sense of urgency among the wider public. It plays out in slow motion, its symptoms may be addressed, but its underlying causes escape treatment. Initial reviews point to the fact that learning losses due to school closures have disproportionately affected vulnerable students worldwide (Spiteri et al., 2022). (Cross) national data documenting the changes in educational outcomes have only started to appear recently (Di Pietro, 2023; Gajderowicz et al., 2025; Jakubowski et al., 2025), however, it will most likely take many years if not decades before the inequalities resulting (e.g. in wage-losses of the cohort affected) become truly visible in big data (Blaskó et al., 2022), which makes it easier for both governments and the wider public to ignore the problem of mounting structural inequities in education altogether. Moreover, although aggravating educational inequalities have received more attention and resources in some countries and contexts but in this area, novel policy approaches did not appear. Moreover, even though educational equity questions were addressed in several studies on the COVID-19 pandemic (Darmody et al., 2021; Hill and Reimer, 2023; Mitescu-Manea et al., 2021), bibliometric analysis of COVID-19 related research on education showed that social justice informed research was at best a marginal occurrence (Durrani and Ozawa, 2024). This points to the fact that academic debate has come to mirror, at least in part, the public invisibility of the crisis of equity in education enabled by the COVID-19 pandemic.

In this paper, we want to explore how the potential for a moment of decisive intervention appeared to emerge in policy debates at the onset of the COVID-19 pandemic and how this momentum disappeared from policy debates. This is why, following Knio (2018, p. 12) we read crises as 'processes that unfold through the various attempts at managing them'. Furthermore, following Mellamphy et al. (2022, p. 1), we argue that the (initial) uniqueness of the situation brought about by the COVID-19 pandemic 'rendered traditional crisis narratives inappropriate and led to an ongoing process of narrative construction by a wide range of actors.' Nevertheless, to a significant extent, not all framings have been translated into policy responses. Our work shows how initial potentialities disappeared in attempts at managing the crisis in both countries, reinforcing economically dominated crisis framings.

This call to revisit the pandemic as a significant moment of possibility of structural and systematic change in education is not new, as children's rights scholars (Colucci-Gray, 2022), educational temporality scholars (Landri, 2025) as well as equity scholars more broadly (Cairney and Kippin, 2022) have already pointed to this (lost) potential. What our paper adds to this scholarship is the tracing of both the emergence and the disappearance of this potential in the concrete policy debates in education in two Central East European countries, as well as enabling thought of the movements of crisis recognition and deflection from within to the outside of the field of education.

2 Methodology

We draw on policy debates in Romania and Hungary throughout the first three waves of the COVID-19 pandemic (mid-March 2020 to July 2021). We have chosen these two countries because, despite a similar approach to governing education during the pandemic's first wave

(Mitescu-Manea et al., 2021), later policies strongly diverged, with Hungary choosing to keep schools open for the majority of time, while face-to-face school education remained largely suspended in Romania. In comparing two markedly different contexts of crisis governance, we show how similar dynamics of deflecting the crisis are at work in both contexts. The assumption underlying our enquiry is that an analysis comprehensively addressing these two diverging contexts is likely to offer insight into present discursive transformations in education policy in other countries too.

The research question that informs our enquiry is: *how have crises in education been discursively framed by governments and non-government actors during the COVID-19 pandemic?* To answer this, we analysed policy documents and policy-related statements issued by government and opposition actors, relevant local authorities and school administrators, as well as non-state actors: NGOs, trade unions, parent and student associations, experts and market actors. Our database was compiled manually by searching relevant outlets in the two countries and putting together the information into common hyperlinked excel sheets. By specifically focusing on comparing governmental and non-governmental policy framings of the crisis, the study aims to shed light on how the crisis was being managed, and how non-governmental actors offered a counterpoint to the limitations of policy frames used by national governments, showing how specific issues were raised publicly but never came to be translated into government policies. This allowed us to explore how a crisis of education was both partly and feebly recognised and how it progressively stopped being recognised thus pointing to how and by which means the moments of 'decisive intervention' were missed.

As we chose to focus on publicly visible NGOs, trade unions and other social movement and economic actors, we have likely included in our analysis positions stemming from the direct experience of these organisations with their users and members. Consequently, a notable limitation of the study is that the positions of school-aged children in socio-economically marginalised remote rural communities with no access to NGO services are likely to be absent from our approach but truly significant. However, due to the digital poverty of such communities (that underpins their very educational marginalisation), these accounts would have only been accessible through face-to-face ethnographic or interview research that was largely suspended for much of the timeframe under analysis here. We hope that our argument helps to open a discussion on these topics and situations, despite not claiming to offer a comprehensive account of positions that have been rendered invisible in policy debates.

Following Bacchi (2000)'s understanding of policy-as-discourse, the study aims to problematise the categories and frames that guided education policy debates during the COVID-19 pandemic. We conceptualise individual policies in a similar manner to Ball ([1993] 2006, p.12), seeing them as 'textual interventions into practice' that give rise to reactions and interpretations from sets of actors affected by these policies. We aim to go beyond 'mere' textual analysis into a discursive analysis of policy as 'how [policy] statements are formed and made possible' (Ball, 2015, p. 311). Being primarily concerned with the discursive dimension of policies, we explored how 'policy ensembles, collections of related policies, exercise power through a production of "truth and knowledge", as discourses' (Ball, 1993, p. 14). We have complemented the critical readings of policies with the analysis of framings employed by non-governmental actors, akin to Benford and Snow (2000), we looked at how policy framing is carried out outside of government institutions by NGOs, trade unions and other stakeholders seeking to produce a change in education during this time.

In order to combine these approaches and render a comparative analysis of two national contexts workable, we employed Critical Frame Analysis (Dombos et al., 2012). CFA has its origins in both social-movement framing (Benford and Snow, 2000), and policy-as-discourse approaches (Bacchi, 2000), and was specifically designed with the analysis of gender equality policies in mind. However, recently it has been used to understand the framing of teacher education (Fernández, 2018) and educational (Mitescu-Manea et al., 2021) and health related inequities in education (Safta-Zecheria et al., 2022).

Following the CFA method, we sampled all legislative and policy documents related to compulsory education (laws, decrees), as well as general legislative and policy documents that indirectly impacted education (e.g. declaring a state of emergency) issued in the period between mid-March 2020 to July 2021. Furthermore, extending the method, we included public statements delivered by the government's executive bodies with direct reference to education. Moreover, by conducting a media analysis and analysing the websites and social media communications of non-state actors occurring in the media, open-letters, open access reports containing policy recommendations, press releases, petitions and other policy-related statements by non-state actors and opposition party representatives were also included. The final sample consists of 277 documents in the Hungarian case and 148 documents in the Romanian case. The material was then coded manually. As in CFA, recurrent cycles of inductive coding were carried out to identify common meta-frames related to the construction of crises in the two national contexts. The analysis of meta-frames focuses on 'overarching frames of a higher-level of generality that stretch over different policy issues and can be operationalised as the normative aspects of issue frames', thus enabling us to identify common normative claims across policy issues (Dombos et al., 2012, p. 6). CFA is a particularly astute methodology in bringing out specific relevant aspects of policies, rather than describing these exhaustively, a point also stressed by some of its proponents (van der Haar & Verloo, 2016). In this vein, we looked at how the language of crisis warranted the recognition of certain calls for action while rendering others invisible. The language of meta-frames allows us to see how different calls for action were prioritised over others within policy frames, enabling us to connect different loosely connected policy documents. In this respect, meta-frames allow us to engage with discourses that assemble policies and make them possible, bringing us closer to Ball (2015)'s understanding of policy as discourse.

In our analysis, we identified three main meta-frames that drove the normative underpinning of education policies in the two countries by constructing the COVID-19 pandemic in education crisis as: (a) a *health* crisis *in* education, (b) a crisis *of education,* and *(c) an economic* crisis *connected to* education.

3 Analysis

3.1 The three meta-frames, their relationship and representation in policy documents and policy debates in Hungary and Romania

The onset of the COVID-19 pandemic in early spring 2020 saw the suspension of face-to-face activities in schools as preventive health measure in both countries. As such, the initial policy measures were explicitly directed towards securing the right to health through proclaiming a state of emergency brought about crisis management policies. As shown in Table 1, securing the right to health meta-frame was clearly present throughout the first three waves of the pandemic in both countries. Nevertheless, it came to be articulated differently in concrete policy measures and progressively lost its importance. By the second pandemic wave in both countries, the framing of the context as an economic crisis became prevalent in crisis management and gradually replaced the initial health framing. While first health and then economic concerns dominated the governments' approaches to crisis management, non-governmental actors signalled that a very different crisis was being produced by the pandemic crisis management policies, namely a crisis of education. This crisis never took the central stage in government policy frames, attesting to how the crisis of education came to be regarded as collateral damage in the process of pandemic crisis management (Saito, 2021). However, to a greater extent in Romania, this framing was dominant in non-governmental actors' framing of the crisis in policy terms – pointing to the opportunity of taking the present moment as one of raising awareness about aggravating structural educational and health risk inequities in education. Thus, although crisis management policies in both countries centred first on health and then on economic matters, the policy debate brought the crisis of education in both countries into a new light. In the following, we will engage with each of the identified meta-frames and show how they played out in the policy debates in both countries.

Table 1 Percentage of documents addressing each of the three meta-frames. The percentage is given in relation to the type of document (government / non-government) and the country (Hungary/ Romania)

	government documents		non-government documents	
	Hungary	Romania	Hungary	Romania
Health crisis in education	79%	49%	63%	30%
Crisis of education	6%	22%	34%	90%
Economic crisis connected to education	16%	15%	17%	7%

Source. : Author's compilation.

3.2 Health crisis in education meta-frame

During the initial wave, administrations in both countries stated that strict lockdown measures including school closures were the only measure that could secure the health of citizens. At the time of the following two pandemic waves, both governments promoted a more nuanced approach to opening schools, declaring that they intended to keep them open for face-to-face education as much as possible. However, in Romania, this was barely realised since schools remained closed for long periods, most notably from November 2020 to February 2021, and in April 2021. When schools were reopened it was promoted by the government as an equity measure aimed at ensuring the right to education, until the end of the second pandemic wave when the opening of schools became linked to the reopening of the economy. This was also connected to different measures of economic support for parents that were more readily available during the first two waves of the pandemic.

By contrast, in Hungary primary schools and kindergartens remained open throughout most of the school year (with the exception of April-May 2021), whereas face-to-face secondary education was suspended for several months (mid-November 2020 to early May 2021). Keeping schools open was justified by the government not as an equity- but as an economic measure that enabled 'the economy' to function by ensuring that parents could return to work as soon as possible and avoiding crises at home, where women could feel overburdened by working while caring for children.

Throughout the three pandemic waves, government actors in Romania repeatedly justified keeping schools closed as a health measure. However, by the second pandemic wave, Romania's policy started favouring a relaxation of health-related restrictions for commercial agents, allowing shopping malls to reopen before schools opened for face-to-face education. This marked a turning point, as health measures applied predominantly to restrictions within education (e.g. restricting the reopening of schools for face-to-face education) but not to commercial agents. This pointed to the fact that quality face to face education was readily sacrificed to protect the health of citizens without putting strain on a consumption driven economy.

Governmental actors in both countries downplayed the extent of the public health crisis when permitting schools to open by presenting schools as 'safe' places and urging parents to send their children to school. This often went hand in hand with performative practices aiming at demonstrating schools' safety from a public health perspective. Most notably in Hungary, starting with the second wave and sharply contrasting to the first wave, government communication systematically downplayed health risks. The government was firmly committed to keeping schools open through the 2020/2021 school year as long as possible. Expanding the 'war against the virus' metaphor (Wodak, 2021) to education, the government portrayed schools as the first line of defence (the warranties for the continuity of life and economic production in the hinterland), and schools were expected to implement 'defence operations', sanitary and social distancing measures. This approach to keeping schools open underscores ways in which from the onset of the second wave the economic crisis framing started to predominate in the Hungarian case.

In this context, non-state actors (most importantly trade unions) and oppositional parties also constructively engaged with the health crisis meta-frame. However, these utterances predominantly focused on stressing the health risks of continuing face-to-face education. In this framing, the government, failing to act in time and protect teachers and students with effective measures, was presented as the main threat to teachers' and students' health and safety that should be held responsible for risking human lives. In response, the government applied a 'reversed form of politicisation', any criticism of the government's measures coming from the opposition, experts or non-governmental actors were labelled as 'political' attacks (Bene and Boda, 2021). The Democratic Union of Teachers (PDSZ) in particular, was frequently accused of making false claims to gain political benefits.

In the Romanian case, the national trade union federation in education (FSLI) repeatedly raised the issue of teachers' right to health. Especially during the short periods when schools reopened, they publicly raised the question of how teachers with underlying health conditions were required to teach, requesting special regulations that would allow them to keep working from home. Moreover, before the COVID-19 vaccines became available requested priority for teacher to get flu jabs that were considered to offer some protection. Later, trade unions together with UNICEF requested teachers become a priority group in vaccination, a point that was also translated into policy.

In short, stakeholders in both countries, especially teacher unions, responded with an argument emphasising the health risks of face-to-face education, with the aim of putting the issue of teachers' right to health and safe working conditions on the political agenda. They also raised concerns about the insufficiency of preventive health measures, the lack of human and material resources for effective sanitary measures, and the spatial and physical constraints of social distancing in schools. Most prominently in Romania, this went hand in hand with experts bringing data showing differences in overcrowding and lack of sanitation in schools into the public debate – pointing to decades of growing inequity in sanitary school infrastructures between rural and urban schools. They called for the schools to be opened and for a governmental plan to address educational inequities by investments in sanitary infrastructures and in reducing overcrowding in schools. Hence, while in Hungary, the argument emphasising health risks was used to advocate for closing schools down, in Romania, stakeholders demanded investment in reducing the health risks and open the schools kept closed by the government.

The debate about vaccination priorities starting in early 2021 marked another important moment in the development of the health crisis meta-frame. In the Romanian case, the government presented vaccinations for teachers, educational staff and later school-aged teenagers as essential pathways to returning to face-to-face education and associated economic activity. Nevertheless, these measures were not prioritised either early on or thoroughly enough. Teachers and other workers in education were given second-degree priority in vaccination early on. Yet, the challenge was, as non-governmental actors highlighted, the low vaccination participation that was attributed to the lack of media and science literacy among teachers and school workers. NGOs, in partnership with public institutions, started vaccination information campaigns and media literacy campaigns to debunk COVID-19 -related conspiracy theories. In turn, the government publicly blamed teachers for the difficulties in ensuring a return to face-to-face education. In Hungary, the government refused to prioritise the vaccination of people working in education, not considering them as priority groups until the end of March 2021, and only when vaccinations became widely available did it frame the acceleration of vaccination as the only way to release restrictions arguing that sole lockdown measures were not effective. This was done despite the fact that non-governmental actors argued for the prioritisation of workers in education.

At the onset of the COVID-19 pandemic, governments appeared willing to prioritise health concerns over economic and educational priorities. This willingness faded progressively and was replaced by economic concerns in both contexts. As such, the most obvious consequence was putting at risk the lives of teachers and other educational workers with health conditions, as well as those of students and their families. Mitigation measures such as quick and effective quarantining, regular testing and priority vaccination could have helped to ease the health burden on educational actors. However, these were either put in place in a delayed way or overly focused on individual cases (in Hungary) or proved to be unsuccessful (in Romania). Finally, non-governmental actors that signalled concerns for infringements on teachers' right to health were discursively marginalised by governments through public discrediting, most notably in Hungary.

3.3 The crisis of education meta-frame: a missed moment of decisive intervention?

Non-government actors were the leading proponents of addressing the pandemic as a 'moment of decisive intervention' in education through policies that would start with but also go beyond crisis management. The main concern of such proposals was ensuring educational equity during remote education but also pointing to the structural inequalities in education that would need to be addressed in order to move towards quality digitised education that could also secure basic health rights. Most non-governmental organisations when signalling this crisis pointed out the immediate need to act, while a minority pointed to the potential for structural transformations in the mid- and long term. We distinguish between two aspects of this meta-frame: the ***crisis in education*** (as an ongoing urgent short-term call for action) and the ***crisis of education*** (as a crisis made visible and exacerbated by the pandemic, but by no means reducible to the pandemic context).

In terms of government positions, the meta-frame was underrepresented (see table 1). The Hungarian government entirely denied and neglected the crisis of education. In contrast, in Romania, it only partially or inconsequentially recognised it.

At the onset of pandemic crisis management policies, the lack of governmental recognition of the existence of a *crisis in education* was visible in the reluctance to address the new remote teaching and learning contexts. Neither resources nor guidelines were available for teachers working under special conditions in Hungary. In Romania, the government, at first, misrepresented the existence of a crisis in education by focusing on the extraordinary features of the health crisis – the right to education was suspended and remote education recommended but not set out in terms of concrete practice recommendations. Several weeks into the pandemic, the shift to online education was declared mandatory by the Ministry of Education, despite numerous calls from NGOs, teacher unions, student councils and parents' associations to address the various educational inequities this entailed. The government only recognised and addressed specific adverse unequal effects the shift to online education would generate (such as recognising that students in low-income households would lag behind for lack of access to educational activities) but withheld from addressing structural inequities resurfacing in the context of the pandemic which had the potential to elicit deeper discussions about curricular and educational reforms. For example, in the Romanian case national examinations (such as the National Assessment at the end of 8^{th} grade) have been proven to underscore the reproduction of socio-economic inequalities (especially between urban and rural, as well as between poor and wealthy students) through de facto enabling performance-based segregation (Țoc, 2018). Inequalities were expected to be strongly exacerbated by school closures that would widen the achievement gap and its individual consequences in terms of high school placement and possibility of passing the Baccalaureate at the onset of the pandemic (Florian and Țoc, 2020). This prompted experts to advocate an annulment of these measures for the 2019/2020 school year and a fundamental replacement of these examinations with formative assessments (Florian and Țoc, 2020). Such proposals recognised that the pandemic did not hit education in a vacuum but only underlined already operating trends of educational inequity and used the context to propose more socially just alternatives. However, even though in Romania these proposals were an integral part of the policy debate they never materialised into policies taken up by the government.

Romanian and Hungarian NGOs working with vulnerable groups and marginalised communities, experts and oppositional parties raised concerns about the right and access to education of disadvantaged and Roma communities, and of students with special education needs during remote education. They repeatedly underlined the aggravating equity crisis in education that surfaced as an outcome of the inequitable impact of public health measures on the access to quality education for vulnerable and marginalised groups. During the second wave in Romania, these NGOs continued to problematise the lack of access to online education for the most vulnerable and the problems involved in effectively ensuring physical distancing in the present infrastructure during face-to-face activities, thus pointing to the relationship between a hard to manage health crisis and a de facto equity crisis in education aggravated by the suspension of face-to-face activities in schools.

As suspending face-to-face education was one of the key strategies for managing the health crisis in Romania, the unequal consequences for educational actors remained largely unaddressed and unrecognised by government actors. Exceptionally, access to education was discussed as a critical priority by government actors during the periods in which the decentralised system allowed certain schools to be open. However, once schools were closed, the issue of access to education became secondary to managing health concerns again. Nevertheless, mainly during the third wave, the government took limited, targeted measures to reduce learning gaps. For example, it introduced remedial classes during the summer, a measure that remained largely underfunded.

In Hungary, the government had never planned significant interventions to tackle equity issues or unequal access to education and to support those missing out from education because of 'pandemic education'. While equity concerns were at the centre of the criticism of the government's crisis management during the school closures in the first wave, such concerns were much less emphasised during the 2020/2021 school year when schools partially remained open.

The pandemic opened an opportunity to reveal underlying systemic contradictions in the education sector. In both countries, at the onset of pandemic management policies, experts and NGOs discussed the resurfacing structural inequalities in the educational system, pointing to the possibility of introducing short-term, pandemic-related changes with a long-term beneficial impact on education through systemic transformations. This frame was underrepresented in the overall sample. However, it is of critical importance for understanding how the COVID-19 pandemic could have offered a moment of decisive intervention.

In Hungary, experts and NGOs working in marginalised communities were actively shaping the public debate during the first wave highlighting that remote education will increase the learning gap of disadvantaged and at-risk students and urging the government to plan for long-term action to address these issues. However, after reopening schools in September 2020, such calls for systemic policy interventions faded away.

In Romania, these proposed measures aimed at limiting the spread of the virus in educational settings, alongside achieving different long-term goals, among which increasing equity (e.g. by redesigning national evaluation procedures), access and quality in education (e.g. by decreasing class sizes) beyond the pandemic, implementing blended education on a mass scale, including in marginalised communities, allowing for open sharing of resources between educators using digital platforms. During the second and third waves, alarm signals regarding the growing learning gap continued to appear in policy debates promoted mostly by NGOs working with marginalised students. These calls lost the comprehensive and systemic edge they had during the first wave.

3.4 Economic crisis connected to education meta-frame

Initially, the two governments addressed the relationship between the economy and schooling very differently, yet their framings converged briefly before the third wave. In the Hungarian government's communication, the goal of saving workplaces and mitigating the economic crisis was a paramount concern in relation to education all along. In the first wave, the government communication primarily featured the locus of crisis in family homes. The Prime Minister repeatedly urged parents to use free childcare services offered at educational institutions and posited the lockdown as a source of crisis *in* the family. From August 2020 onwards, the government explicitly proclaimed that its foremost goal was to mitigate the economic consequences of the pandemic. Within this meta-frame, the education system was viewed as an auxiliary to keeping the country's workforce, parents with young children in particular, at work. This was of such paramount importance that even during the total school closure in April-May 2021, daycare was provided in schools in justified cases. Non-governmental actors and oppositional parties advocated for welfare measures, such as paid care and sick leave for parents.

In Romania, during the first two waves of the pandemic, the macro-economic impact of pandemic mitigation measures was not presented as a primary concern neither by the government nor by non-state actors. The government introduced paid care leave for parents staying at home with their children, a policy marred with uncertainties and that focused on tax-paying individuals only. NGOs drew attention to the difficulties experienced by families in securing basic food and hygiene needs and to the growing costs of education for families (that of technological devices, internet connectivity, and, in some cases, the fees of afterschool activities). At the very end of the second wave and during the third wave, the reopening of schools was presented as a vital part of the full re-launch of the economy. Schools were thus, for the first time, related to economic operational capacities rather than access to education and health issues. This continued implicitly during the third wave, when care leave was no longer provided to parents and measures directed at closing schools were organised as exceptions to the rule (e.g. extending the Easter holiday).

In summary, while the economic crisis meta-frame became the main driver and dominant narrative of the Hungarian government's interventions regarding schooling from the second wave onwards, in Romania, the macro-economic impacts of the pandemic only became a core issue by the third wave. While in Hungary, the meta-frame of an economic crisis connected to education was used to justify the continuity of face-to-face education, in Romania, where face-to-face education was suspended for the most time, the government gave exemptions to private providers and thus favoured access to non-compulsory education for children from high-earning households that could afford private afterschool education. Nevertheless, both governments paid special attention to the effects of school closures on the availability of workforce and therefore prioritised opening care services for younger children. While the Hungarian government was concentrating on workfare measures and provided little social protection in a regional comparison (Aidukaite et al., 2021), the Romanian government provided economic support for parents who could not go to work due to childcare responsibilities in the periods when face-to-face education was suspended and increasingly capped this form of protection as the crisis progressed. What is common, however, is that the rationale of these government actions targeted households with tax-paying, working parents, whereas precarious households were much less or not at all supported.

Finally, mitigating the effects of the economic crisis became the main concern of governments in both countries by the third wave. This served to deflect both the focus on securing citizens' health and that of structurally transforming education.

4 Discussion

In this paper, we analysed how the COVID-19 pandemic could be read as a 'moment of decisive intervention' in education policy debates in Romania and Hungary and have shown how the emancipatory potential of the crisis (Jessop, 2018) has been missed.

We found that non-government actors in Hungary and Romania recognised structural health and equity crises in education related to the ways in which the COVID-19 pandemic was managed by the governments. These crises have not been fully acknowledged publicly by either of the two national governments during the first 15 months of the pandemic. Thus, the crisis context failed to materialise as a 'moment of decisive intervention' towards health and educational reforms. Instead, by addressing the pandemic as an economic crisis, the government contributed to the consolidation of the structural health and educational inequality in the educational systems. In Romania, the use of the economic meta-frame involved closing schools as one of the main instruments to controlling the spread of the SARS-CoV-2 virus, in sharp contrast to a more flexible and relaxed restriction policy on economic activity. In Hungary, the government's insistence to keep primary schools and kindergartens open was justified by the need to ensure that parents could continue working and need not remain at home to care for their children. In both countries, the 'economy' was prioritised over education or health concerns, even when this approach endangered fundamental rights or even lives.

In a nutshell our research shows how social justice policy issues, such as educational and health equity in schools, can point to larger structural inequalities that briefly become visible and appear addressable in policy making during the peak of a crisis only to vanish before they become translated into transformative practices. Akin to what Paolo Landri (2025) has described as 'tame problems' educational policies in Italy during the pandemic as problems inscribed with a ready-made solution without transformative potential, in Hungary and Romania health and educational equity in schools were also 'tamed' into a neoliberal outlook on education that emphasizes strictly maintaining as much economic activity as possible as the dominant raison d'être for the state. This overpowering of 'the economy' as an undisputable and unchallengeable priority in dealing with the crises is reminiscent of Massey (2013)'s earlier warning that the ways in which the economy is politically constructed as the creation of wealth through growth have erased imaginaries for calling into question the constitution of social relations. In this case, the reading of crisis as foremost an economic crisis signals the closing of the window for decisive intervention that would allow for a policy otherwise (Clarke et al., 2015); one that would address both educational and health inequities in education and that had, if only briefly, at the onset of the COVID-19 pandemic, opened the space for contesting structural inequities. This opening of policy debates on issues of structural inequities was a crucial moment in creating a space where a new consensus around democratic values and against dominant framings of economic priority could begin to be built. While the moment of decisive intervention for governments may have passed, the creeping crisis may still hold the potential for the emergence of a new consensus if we work to acknowledge the momentary emergence of alternative framings of potentialities for recognising the COVID-19 pandemic as a crisis of education. In this regard, while the present crisis has yet again been ventriloquised (see Clarke, 2023, Chapter 6) by governments to support the political primacy of growth-oriented economic goals, there is still a space open to make the crisis speak on behalf of the needs and interests of marginalised populations.

Nevertheless, governments' denial of a health and equity crisis of education turns the present conjuncture into a creeping crisis on a path towards more structural contradictions and less equity – stabilising what Hay (1999) has termed catastrophic equilibria. This development is visible in the fact that during the winter of 2021/2022, schools in Romania started using remote education as an alternative to heating the schools for face-to-face education because of the rising costs, further aggravating educational inequities associated with digital poverty. In a next step, the austerity measures proposed by the Bolojan government in 2025 were directed at reducing the education budget especially downsizing programmes geared towards marginalised students, restricting access to scholarships and warm meals in school as well as increasing the teaching load of all teachers. These measures can be read as a continuation of the economic crisis framing materialised during the pandemic.

5 Conclusion

Through the over-emphasis of an economic framing of the crisis by governments, corresponding measures were aimed at resolving these crises through interventions. Consequently, the locus of the crisis moved from education to maintaining the capitalist economic structures. Through this, what Saito (2021) has termed COVID-19 related collateral damage in education was perpetuated and solidified in the studied countries. This displacement unequally affects participants in the educational process: teachers with health conditions in Hungary who needed to continue working throughout several waves of the pandemic without receiving priority in the vaccination campaign for months in order to ensure that parents with care responsibilities can continue working through the pandemic, or economically and digitally marginalised rural students in Romania who may not have had de facto access to school for more than a year during the period studied here, who could not return to school in order to prevent health risks despite commercial activities resuming as a priority activity despite the health risks. This discursive shift addresses the crisis symptoms recognised by governments by moving the consequences of the crisis onto marginalised groups that are also discredited in the policy debates (e.g. the teacher union in Hungary that was accused of making false claims for political benefits) – thus the crisis as a moment for decisive intervention is deflected and the most marginalised members of society are left to deal with the unequally distributed consequences of the pandemic on their own while remaining increasingly invisible in the policy debates. Through this deflection, the present contradictions in the education system are rendered invisible and irrelevant, and the transformative momentum of the crisis is lost.

The loss of momentum is connected to the question of how structural transformation towards (health and educational) equity in education is seen by governments and how much of this recognition is translated into interventions directed to practice. In education, as opposed to public health, equity still appears as a contested term by scholars and international actors alike (Cairney and Kippin, 2022, p. 4), the pandemic seemed to bring this debate to the centre stage of educational policy making worldwide, if only for a relatively brief moment. Marking this moment is of political significance for how future crises and their impact on education should be managed. Nevertheless, at present the pandemic seems to have catalysed neoliberal oriented proposals for education (Fleming, 2023), rather than equity-oriented ones. At the same time, in the wake of the pandemic, technology rather than democracy has come to dominate the public education related policy imaginary (Norris, 2023). In view of these points refocusing the potential for structural transformation in education as a reparative modality of post-pandemic future making is of paramount importance.

Whereas Romania and Hungary had a similar starting point at the onset of the COVID-19 pandemic, their crisis management trajectories diverged. This led in turn to different ways in which the unfolding crisis affected different marginalised subjects. Yet, what the two trajectories shared was a reproduction of neoliberal capitalist economy through educational policies to the detriment of educationally or health-wise vulnerable subjects. In future studies, the question of whether the COVID-19 pandemic related crisis management policies worked to reproduce neoliberal economic policies through education and what the local and national particularities of these policies were and how these came about and which actors had to shoulder the unequal consequences of the pandemic, and its management should be investigated. Investigating these questions more broadly could help overcome the limitations of the present study that is focused on a relatively brief period at the onset of the COVID-19 pandemic in two Central and Eastern European countries and offer a more comprehensive overview of how crisis narratives unfolded during the pandemic and which groups are potentially exposed to the unequally distributed consequences of the pandemic. Practically, this approach could help inform transformative interventions in future educational policies, as well as direct reparative efforts.

Finally, from a theoretical perspective in a time of rapidly unfolding crises narratives that have become an instrument of global governance (Aul, 2024) that seeks to govern through anticipation (Elfert and Ydesen, 2024), pointing out how social justice informed transformative policy imaginaries vanish by being deflected to make room for government supported economic measures is of paramount importance.

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Instrument constituencies in the policy process – What makes them unique? A theoretical review

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Abstract

This paper reviews the empirical applications of the concept of instrument constituencies. Instrument constituencies comprise diverse actors (academics, bureaucrats, consultants, and practitioners) whose common interest is the promotion of a particular policy instrument or a set of instruments. Building on the seminal work by Voss and Simons (2014), the paper surveys existing case studies and examines empirical observations that support the propositions associated with the concept. The analysis connects the empirical observations to the propositions associated with the concept and reflects on their distinctiveness relative to other collective entity concepts in the policy process. Through an assessment of the theoretical uniqueness of the empirical predictions, the paper demonstrates that while some case studies identify empirical patterns consistent with the propositions, the confirmatory power of the observations varies. The paper concludes by arguing that future research on instrument constituencies should more consciously focus on predicted observations with stronger discriminatory power in relation to other established concepts. The analysis also demonstrates the general value of assessing the theoretical uniqueness of predicted evidence as described by Beach and Pedersen (2016) for case studies that rely on theories of the policy process.

Keywords: *instrument constituency, policy process, case study methodology, expert networks, theories of the policy process*

1 Introduction

The concept of instrument constituencies is a recent innovation in public policy process scholarship. Instrument constituencies are collective entities comprising diverse actors who share an interest in the development and advancement of a policy instrument. They consist of experts and specialists who are diverse in their roles related to the policy process: they can be academics, bureaucrats, consultants, managers of the implementation, etc. The only attribute they all necessarily share is their special interest in a policy instrument or a set of policy instruments. This common interest fosters cooperation and, over time, leads these actors to form an 'instrument constituency' that exhibits collective actor qualities.

The concept was proposed in the seminal article by Voss and Simons (2014). It can explain some common observations that relate to how preferred policy solutions become attached to various policy problems over time or how expert communities may 'lock in' the usage of their preferred policy instrument for prolonged periods. The presence of instrument constituencies in the policy process can have important implications. The latter's concerted efforts to promote a particular policy instrument can result in the 'oversupply' of that instrument, because as a constituency of experts becomes increasingly focused on advancing a specific instrument, less attention may be devoted to exploring alternative policy solutions.

The concept of instrument constituencies fits within a broader trend in policy process scholarship that focuses on groups or networks that display collective actor qualities. Other theorized collective entities in the literature include advocacy coalitions, epistemic communities, policy communities, and discourse coalitions (Simons and Voss, 2017). Compared to other theorized collective entities in the policy process, the key difference is that for instrument constituencies, the interest in a particular policy instrument is the source of the group's cohesion. For instance, advocacy coalitions are unified by shared beliefs and epistemic communities by common concerns about specific problems. In the case of instrument constituencies, they do not have a shared belief system or clear shared convictions about how to solve a particular problem (Voss & Simons, 2014, pp. 741–742).

Since the seminal articles, the research connected to the concept of instrument constituencies has continued to develop, enabling some new reflections. With new case studies now available, it is now possible to reflect on how prior empirical case studies operationalize the collection of relevant empirical observations. Since a relatively wide array of empirical expectations can be derived from the propositions attached to the concept, it is useful to take a closer look at which of these can provide the strongest inferences that reinforce the explanatory relevance of the concept. This assessment can also include how it is possible to distinguish instrument constituencies from the other relevant collective entity concepts with which they were compared early on in the literature.

To contribute to this aim, this paper addresses the following question: What forms of empirical evidence support the conceptualization of instrument constituencies as a distinct type of collective actor in the policy process, and which observations are most useful in distinguishing them from alternative collective actor concepts?

In order to answer this question in a structured manner, the analysis draws on the concept of the theoretical uniqueness of empirical observations by Beach and Pedersen (2016, p. 182–184). In the analysis, the propositions associated with the concept of instrument constituencies are linked to the corresponding empirical observations from existing case studies. For each proposition, reflections on the theoretical uniqueness of the associated empirical observations are also added to assess which of the associated empirical predictions have stronger discriminating power vis-à-vis other collective entity concepts in the policy process.

In the discussion section, it is noted that while the case studies have established that their findings are in line with empirical expectations and can have important practical implications, a more consistent approach to the case studies could better accelerate the development of the concept.

The conclusion highlights that not all of the empirical expectations related to the propositions can produce observations with the same degree of theoretical uniqueness. Based on the analysis, the propositions by Simons and Voss (2018) that can generate the most theoretically unique expectations are *Proposition 8*, which refers to the disconnectedness of solutions from problems in the policy process, and *Proposition 9*, which refers to the spread of instrument constituency activities across the policy process. Case studies should more uniformly reflect these expectations to produce stronger inferences.

2 Scholarly context

2.1 Theories of the policy process

The concept of instrument constituencies is situated within the broader field of policy process scholarship. Voss and Simons (2014) themselves also located their work within the policy process scholarship, while the concept of instrument constituencies builds upon earlier work on policy instrumentation as well—notably the work of Lascoumes and Le Galès (2007). Policy process scholarship in general seeks to provide better and more detailed explanations for real-world policy outcomes than those offered by functionalist models such as the 'policy cycle'—which tend to depict public policies as calculated governmental responses aimed at mitigating clearly defined societal problems (Weible, 2023, p. 8–10). More developed policy process theories offer theoretical propositions that aim to better capture the inherently complex interactions of policymaking, thereby accounting for outcomes that diverge from functionalist expectations.

The functionalist line of thinking can be traced back to Harold D. Lasswell's works in the 1950s (Weible et al., 2022), yet in the form we are now familiar with, it was introduced in later works such as Brewer (1974). The functionalist approach to policymaking describes a normative ideal: that at each decision function related to a public policy, the processes should conform to the requirement that the decisions support the public policy alternative that best delivers the desired public benefits (Lascoumes & Le Galès, 2007, pp. 2–3). The strong normative appeal of this functionalist approach makes it suitable for public institutions to promote it as a processual goal. We can indeed find the approach in the guidelines issued by public bodies (European Commission, 2021; HM Treasury, 2022)

We can also position the concept of instrument constituencies in relation to earlier literature on the theories of the policy process. Voss and Simons (2014) reflected on some of the observations of John Kingdon, whose seminal work (Kingdon, 2014) established the Multiple Streams Framework, one of the most commonly applied theoretical frameworks in the field. Kingdon recognized that 'policy entrepreneurs' push their preferred policy solution and try to attach it to different problems, an observation that is a key starting point for the concept of instrument constituencies (Voss & Simons, 2014, p. 740). Further connecting instrument constituencies with MSF, Mukherjee and Howlett (2015, p. 70) also theorized that instrument constituencies represent the agency behind the *policy stream* of the framework. This differentiation among the three streams is also used to theorize the relations between instrument-constituency activities and the broader policy process (Simons and Voss, 2018, p. 27–29). The authors also reflect on how other 'types of social formations' in the scholarship relate to instrument constituencies (Voss & Simons, 2014, pp. 740–741). These are notably advocacy coalitions, epistemic communities, discourse coalitions, and other types of theorized collective entities in the policy process that instrument constituencies need to be differentiated from.

2.2 Case study literature

To provide meaningful reflections, in the analysis I follow Beach and Pedersen's logic (2016, pp. 171–176), which details how empirical evidence from within-case studies can differ in its confirming or disconfirming power regarding the tested theoretical explanations.[1] Theoretical weight hinges on the certainty and the uniqueness of the empirical evidence. Theoretical uniqueness describes the 'expected probability of finding the predicted evidence' (p. 182) in the case that a proposition is not true. In other words, theoretical uniqueness describes the discriminatory power of the predicted observation against alternative explanations.

Uniqueness is important because finding theoretically predicted evidence that is also distinct provides stronger confirmation. Causal case studies, therefore, should aspire to find empirical evidence that is also more unique to strengthen inferences. This is why Beach and Pedersen (2016, p. 184) call for 'assessing theoretical certainty and uniqueness for each

[1] Beach and Pedersen (2016, p. 169–171) advocate a 'Bayesian logic' for drawing inferences from case studies. In this understanding, both confirmation and disconfirmation can be understood as ways to make inferences from observations.

proposition'. Assessing uniqueness can help us to understand which properties attached to the concept of instrument constituencies discriminate it from the above-mentioned rival collective entity concepts in the policy process.

2.3 Distinguishing the concept

Situating the concept within broader scholarship also highlights which other theoretical concepts the instrument constituencies need to be distinguished from. The concepts described above are situated on different levels of the 'ladder of theoretical abstraction' (Sartori, 1970); thus, first, some clarifications are necessary in this regard.

The functionalist approach is on a higher level of abstraction than a potential explanation that applies the concept of instrument constituencies. While these two terms are correctly contrasted, it should be noted that the distinction that is made here is in fact between the functionalist approach and *all* the 'more developed' theorized policy process explanations. That is a broader category, and within it, explanations that use the concept of instrument constituencies are only a subset. This is because, while functionalist explanations and instrument constituency explanations are mutually exclusive, they are far from exhaustive together, as there can be many other observable cases that neither explanation can account for.

Since the concept of instrument constituencies is a lower-level concept within the realm of these 'advanced frameworks', whenever a functionalist explanation of an empirical case is proved to be false, that inference alone would still mean the same for all of the 'developed' theoretical explanations. Disproving a functionalist explanation alone has little to say about whether an instrument constituency explanation is true.

To achieve more meaningful distinctions, the analysis needs to focus on that lower level of abstraction where the concepts, including instrument constituencies, can be both mutually exclusive and also jointly exhaustive. This lower level is where the already mentioned discrimination between the different collective entities in the policy process is situated.

Instrument constituencies and other conceptualized collective entities (advocacy coalitions, epistemic communities) are mutually exclusive denotations, in that the same collective entity cannot belong to multiple categories simultaneously. While it can be envisaged that their 'membership' can partially overlap, as a collective entity, they cannot bear the exact same characteristics, because that would make any meaningful distinction impossible. These different collective entity explanations can also be collectively exhaustive in the sense that each group that bears the characteristics of a collective entity must belong to one of these categories. While I do not intend to claim that the existing concepts in the literature are already developed well enough to exhaustively cover all the relevant cases of policy processes in the real world, it is at least theoretically possible to establish such an exhaustive classification.

Following a case study methodology that calls for evaluating the theoretical uniqueness in empirical observations can help to clearly define some important focal points for assessing the relevant case studies. In the following parts of the paper, I detail how theoretical uniqueness can be understood for the observations associated with each proposition on instrument constituencies, and also examine what empirical observations prior case studies have found so far.

3 Analysis of case studies

To review how the concept of instrument constituencies has been utilized in existing case studies, I conducted a structured search of scholarly articles that engaged with at least some of the propositions related to instrument constituencies. The criteria for including articles were

(i) that they contained reflections on one or more of the propositions described by Simons and Voss (2018) and (ii) that they contained a description that could be used to reconstruct how empirical observations were connected to these propositions. The search strategy first involved identifying all articles from the Web of Science database citing either of the two foundational articles by the original authors (Simons and Voss, 2018). To identify articles that treated the concept of instrument constituencies as a main theme of the study, I further narrowed the selection to those articles that contained a reference to the concept in their abstract or title. From this selection, the articles were assessed one by one to identify whether they engaged with the propositions and through what empirical observations. Finally, I included the seminal paper by Voss and Simons (2014), which is a case study that meets the criteria. Through this screening process, 17 articles emerged as detailed case studies that met the criteria. These articles are presented in Table 1.

Table 1 Summary of the reviewed case study articles

Authors	**Year**	**Title**	**Policy Theme**	**Policy Instruments**
Voss & Simons	2014	Instrument Constituencies and the Supply Side of Policy Innovation: The Social Life of Emissions Trading	Environmental Policy	Emissions trading
Béland & Howlett	2016	How Solutions Chase Problems: Instrument Constituencies in the Policy Process	Social Policy	Social insurance, pension privatization
Mann & Simons	2015	Local emergence and international developments of conservation trading systems: Innovation dynamics and related problems. Environmental Conservation	Environmental policy	Conservation trading schemes
Perl & Burke	2018	Does institutional entrenchment shape instrument adjustment?: Assessing instrument constituency influences on American and Australian motor fuel taxation.	Transportation policy / Fiscal policy	Fuel taxation
Foli et al.	2018	How instrument constituencies shape policy transfer: A case study from Ghana	Social Policy	Cash transfers
Zito	2018	Instrument constituencies and epistemic community theory	Environmental policy	Multiple instruments

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Authors	Year	Title	Policy Theme	Policy Instruments
Fitch-Roy et al.	2019	Policy Instrument Supply and Demand: How the Renewable Electricity Auction Took over the World	Environmental policy / Energy policy	Renewable energy auctions
Saguin & Howlett	2019	Policy Transfer and Instrument Constituency: Explaining the Adoption of Conditional Cash Transfer in the Philippines	Social Policy	Cash transfers
Pischke & Wellstead	2020	Reimagining instrument constituencies: The case of conservation policy in Mexico	Environmental policy	Payments for ecosystem services
Blümel	2021	Innovations in Innovation Policy: Reconstructing the Emergence, Legitimation, and Dynamics of Cluster Policies in Germany	Innovation policy	Cluster policies
Grashof	2021	Who put the hammer in the toolbox? Explaining the emergence of renewable energy auctions as a globally dominant policy instrument	Environmental Policy	Renewable energy auctions
Nicholls & Teasdale	2021	Dynamic persistence in UK policy making: the evolution of social investment ideas and policy instruments.	Regional/ local development	Social investments policy
Simons & Schniedermann	2021	The Neglected Politics Behind Evidence-Based Policy: Shedding Light on Instrument Constituency Dynamics	Public administration reform	Evidence-based policy('meta-instrument')
Strassheim	2021	Who are behavioural public policy experts and how are they organised globally?	Public administration reform	Behavioral policy

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Authors	Year	Title	Policy Theme	Policy Instruments
Falkenström & Svallfors	2022	The Knowledge-Management Complex: From Quality Registries to National Knowledge-Driven Management in Swedish Health Care Governance	Health care policy	Evidence-based policy
Svallfors et al.,	2022	Networked reports: Commissioning and production of expert reports on Swedish health care governance	Health care policy	Multiple instruments
Ekstedt & Lundstedt	2024	Wanted Refugees: The Forming of an Instrument Constituency for Refugee Resettlement in the European Union	Immigration/ refugee policy	Third-country resettlement system

Articles that did not include clear descriptions of how empirical observations were connected to specific propositions were excluded from further analysis, even if they contained some reflections on the concept of instrument constituencies. Some of these articles connected policy diffusion to instrument constituencies (Béland et al., 2018; Demirbilek et al., 2020), while Weible (2018) offered primarily theoretical reflections. A recent study that applied collective entity theories to analyze public administration reform networks in Italy (Capano et al., 2024) reflected on an instrument constituency explanation as well, yet the text did not contain much detail about the relevant propositions, as the study's findings did not support the presence of an instrument constituency.

The number of case studies that relied on the concept of instrument constituencies is still limited. Nevertheless, despite the literature's slow development, it continues to attract interest. The majority of articles were published in journals with a general public policy orientation, but articles have also been published in journals with more specialized thematic orientations. The case studies have covered different policy themes, such as social policy, environmental policy, immigration policy, administrative reform, fiscal policy, transportation policy, and innovation policy. Most case studies have focused on a single case, but Béland and Howlett (2016) analyzed two cases (social insurance and pension privatization), and Perl and Burke (2018) compared two parallel cases—motor fuel taxation policies in the United States and Australia. In terms of policy outcomes, most case studies focused on national-level analysis covering a diverse range of countries—including various European nations, the United States, Australia, the United Kingdom, Ghana, and the Philippines. Additionally, there are case studies that focus on policymaking at the level of the European Union (Ekstedt and Lundstedt, 2024), and others that focus primarily on the transnational dimension of instrument constituencies (Béland and Howlett, 2016; Grashof, 2021). Furthermore, Blümel (2021) reflected on regional and federal aspects of policymaking through the analysis of regional cluster policies in Germany.

4 Theoretical propositions and empirical observations

After its initial introduction into policy process scholarship, the concept of instrument constituencies was further clarified by the original authors. In their 2018 article, Simons and Voss provided additional details by identifying ten distinct propositions. This structured presentation of the key mechanisms is a valuable guide for further work on instrument constituencies. Detailed empirical expectations can be derived from these propositions in a structured manner and can be examined in detail through case studies.

In the following sections of the paper, I provide an overview that reiterates each of the propositions outlined in the Simons and Voss (2018) article, supplemented by my own reflections on their existing and potential empirical operationalizations in case studies. In line with the case study methodology of Beach and Pedersen (2016), I pay special regard to the theoretical uniqueness of the different empirical expectations.

4.1 Emergence of a social life and prospective structures

Simons and Voss (2018) proposed that following the introduction of a new policy instrument, a distinct 'social life' can emerge around it. The involved actors begin to interact and start to form interdependencies in their work, laying the foundation for an instrument constituency characterized by collective actor qualities. The empirical expectation associated with this proposition is that during the initial phase of a novel instrument, one should observe the emergence of a new social network—a network assembled around the instrument itself. The group does not need to be 'entirely new', as it can contain members from a previously existing collective entity, yet they must display changes in their characteristics. Zito (2018), for example, noted that an epistemic community can transform into an instrument constituency over time. Even if the instrument constituency has some sort of predecessor, there needs to be a marked shift in the focus of the network, and changes in the participating actors can also be expected. The second expectation is that this social life should be linked to the instrument, distinguishing these networks from those whose cohesion stems from other factors. The uniqueness of the empirical evidence that supports this proposition is dependent on whether it can prove that the observed social life is 'instrument-centered'.

The second proposition posits that the design of a new policy instrument includes prospective structures that align the interests of different actors (Simons and Voss, 2018). The technical design of the policy instrument can lay down the foundations of new practices in the implementation and analysis of public policy. These can later create opportunities in the form of new institutional arrangements, new appointments, new consultancy or analytics opportunities, etc. Promoting a particular policy design thus becomes in the interest of those who expect that a new instrument will lead to desirable developments.

The observation of prospective structures alone provides limited uniqueness for instrument constituencies. It is the relative importance of these prospective structures for the group's cohesion and the group's heterogeneity that can provide stronger inferences, helping confirm the characteristics of instrument constituencies. Relative importance can be observed through the lack of other factors that could align actors' agency. A lack of shared convictions among actors can increase confidence that an observed 'nascent' collective actor is an instrument constituency rather than an advocacy coalition or an epistemic community. The heterogeneity of the available prospective structures is another factor that can increase confidence in an instrument constituency explanation. If the prospective structures are located across different policy domains and ranges of functions across the policy process, this is a more unique observation, as other theorized collective entities are expected to be active in a narrower, more specific policy setting (Weible, 2018, p. 65).

The first two propositions about the emergence of instrument constituencies were among the most consistently analyzed and largely confirmed in the case studies. The latter found evidence of emergence dynamics as well as the heterogeneity of the actors brought together by a newly forming instrument constituency. Perl and Burke (2018, p. 93) described the beginning of the US fuel tax instrument constituency, pointing out how it consisted not only of road engineers but also of automobile manufacturers and members of the industry. The study by Falkenström and Svallfors (2022) about the Swedish health-care knowledge management complex is another good example for describing this aspect in detail. The authors highlighted both the heterogeneity of the actors and the factors that brought them together: 'Since the instrument constituency is so heterogeneous and potentially unstable, efforts have to be made to ensure some semblance of coherence' (p. 1061).

Zito (2018, p. 51) also used the diversity of the forming instrument constituency for the 'Energy Star' ecolabel as evidence to support the claim that the observed network is an instrument constituency rather than an epistemic community. When Foli and Fenwick (2018, p. 113–114) described a group of transnational actors who emerged as an instrument constituency around conditional cash transfer programs, they also demonstrated that while the first members were mostly international organizations, research institutions also became involved in the constituency at the national level.

4.2 Connecting modelling and implementation

'Proposition 3' reflects the connectedness of modelling and implementation (Simons and Voss, 2018). Policy instruments are grounded in 'abstract functional models' which are 'blueprints' and guide the implementation of policies. Instrument constituencies connect modelling and implementation, with members involved in both. Once they gain agency, instrument constituencies are expected to actively nurture linkages between these functions. The creation of models, guidelines, supporting studies, and related materials is done by the same interconnected network of experts. Since the degree of connection between the actors in modelling and implementation can be 'trivial,' the theoretical uniqueness of evidence here hinges on the intensity and exclusiveness of these linkages. A narrower, 'myopic' focus of the theoretical modelling that is closely related to the implemented instrument and largely disregards alternative solutions as relevant alternatives can yield stronger observational evidence. In that scenario, the strength of evidence can also depend on the observations made about what is 'left out' from the models. A detailed inclusion of alternative solutions in the discussion, framed as viable and reasonable, can even bear disconfirmatory power in this case.

Saguin and Howlett (2019) detailed how the transnational instrument constituency around conditional cash transfers produced important 'knowledge products' near the beginning of the implementation, reflecting also the connectedness of modelling and implementation. They also found proof that the design of the cash transfer program was largely influenced by these (Saguin and Howlett, 2019): 'The resulting design of the Philippine CCT program highly resembled the stories codified by the instrument constituency' (p. 360). The close connectedness of modelling and implementation was also analyzed by Blümel (2021, p. 549) in the case of cluster policies in Germany, and for evidence-based policy by Simons and Schniedermann (2021, p. 518). In the case of behavioral public policy, a related subject, this was also reinforced by the analysis of Strassheim (2021): 'They establish a kind of politico-epistemic interlinkage in which actor groups, behavioural evidence[…] and practices of validating and implementing indeed exist "for and by" (Voss & Simons, 2014: 4) behavioural instruments' (p. 12).

4.3 Source of stability: Structural promises

The original authors of the concept differentiated between the functional and structural promises of the instrument constituencies (Simons and Voss, 2018). They argued that while functional promises—expectations about the policy instrument's societal benefits—are valued by those outside the policy community, structural promises provide stability for the instrument constituencies. While constituency members may be driven by both types of promises, structural promises offer distinct incentives to promote and sustain the instrument. These are manifested as specialized institutional arrangements for planning, analysis, and implementation of the instrument, a demand for specialized expert services, or the expansion of research related to the policy instrument.

What I have noted about the empirical testing of the initial prospective structures also holds true for this proposition. The existence of structural promises alone does not strongly rule out other explanations. The additional observation that members of the instrument constituency actively promote arrangements that support and maintain these structures can increase confidence in the explanation. Although such effects may be difficult to observe directly, qualitative 'confessionals' obtained through interviews might reveal that certain structures were created or maintained even when not necessary from a functionalist perspective. The heterogeneity of the structures can also strengthen the uniqueness of the related observations. Some of the prior case study observations focused on this aspect. Perl and Burke (2018, p. 92) described the 'highway beneficiaries' as a diverse group that formed the instrument constituency advocating for fuel taxation earmarked for building roads. Blümel (2021, p. 547–548) gave a detailed description of the proliferation of new roles and tasks connected to the implementation and modelling of cluster policies created in Germany, both at the level of project consortia and at the federal executive agency that oversaw implementation.

4.4 Sources of strength: Functional promises, reflexive coordination, and socio-material infrastructure

Simons and Voss (2018) grouped three propositions together as sources of strength for the instrument constituencies. These three propositions also share the characteristic that related empirical observations are associated with relatively low levels of theoretical uniqueness. Most of the empirical expectations derived from these propositions also hold for other collective entities, such as advocacy coalitions and epistemic communities. To make stronger inferences in a case study, more unique evidence first needs to show that the observed collective entity can be treated as an instrument constituency, and only then can these propositions be interpreted in a way that supports an instrument constituency explanation for the concrete case.

'Proposition 5' is connected to the functional promises that create acceptance for the instrument by the public and the decision makers (Simons and Voss, 2018). The instrument constituency relies on these functional promises for necessary external support that backs the instrument. Functional promises were not always addressed in case studies, but there are some good examples for the observations. Saguin and Howlett (2019, p. 361) described how the functional promise linked to the conditional cash transfer was not just to support the short-term alleviation of dire needs but also to contribute to the long-term eradication of poverty. Foli and Fenwick (2018) detailed how the studies created by members of the instrument constituency influenced expectations associated with the instrument concerning the provision of sufficient backing:

As the minister in charge of social protection at the time mentioned during an interview, several publications, including by the DFID, the World Bank and other international organizations, provided critical information on cash transfers and the Latin American experience. This was used to support the argument that the program would 'contribute to economic growth and [was] not a disincentive' (p. 118).

'Proposition 6' asserts that instrument constituencies over time can display active coordination, which is also another process that makes them stronger (Simons and Voss, 2018). Following their initial evolution, these constituencies begin to exhibit reflexive collective-actor qualities with a nontrivial degree of coordination. Empirically, this implies that one should observe specific activities—such as organizing events, creating platforms, forming associations, or holding meetings—that foster joint action in favor of the instrument. The empirical expectations here are relatively straightforward, and the proposition indeed was widely confirmed by the case studies. Foli and Fenwick (2018, p. 117) described the 'transfer project' as a platform that was developed in relation to conditional cash transfers to disseminate information and connect actors. They also gave details of the international conferences that were organized by the World Bank that promoted cash transfers as an instrument (Foli and Fenwick, 2018, p. 119).

Simons and Schniedermann (2021, p. 518) described how the instrument constituency around evidence-based policy (understood as a 'meta-instrument') fostered the creation of its own journals and the formation of the 'Evidence-Network' that linked researchers and practitioners worldwide. Nicholls and Teasdale (2021, p. 805–806) noted that the establishment of the 'Social Investment Task Force' in the UK marked the birth of an instrument constituency that promoted social investment in a changing political landscape over the next 20 years. In this case, the instrument constituency was found to be more formalized from an early stage and was not just a loose network but one with a clear agenda and reflexive activities.

'Proposition 7' concerns the development of 'socio-cognitive' and socio-material infrastructures fostered by the instrument constituencies (Simons and Voss, 2018, p. 25–26). Socio-material infrastructure contains those structures that emerge from the implementation of the instrument, such as databases, metrics, technical infrastructures, trading platforms, specialist software, legal structures, etc. These non-argumentative elements, on the one hand, can provide additional work for members of the instrument constituency, and beyond that, they can also exacerbate the path dependence associated with a given instrument (Voss and Simons, 2014, p. 742). The production of specific statistics, metrics, or scorecards, for example, might significantly reinforce prevailing interpretations in public policy. Furthermore, the material infrastructure may be tangible, reinforcing the reliance on the cognitive constructs developed by the instrument constituency, such as models, guidelines, or evaluations. This may be particularly evident in cases where transnational or federal initiatives foster the development of shared infrastructure across different jurisdictions, reinforcing a particular kind of interpretation of policy activities and policy outcomes.

Mann and Simons (2015, p. 328–329) described the emergence and spread of conservation trading, including the development of the extensive financial-legal infrastructure that is required for these trading schemes. Ekstedt and Lundstedt (2024) offered a detailed account of the socio-material infrastructure of a policy instrument, which also took form in the 'resettlement support facility in Istanbul' as a form of physical infrastructure (Ekstedt and Lundstedt, 2024, p. 383). While this paper did not offer details on the evidence for the more distinctive expectations associated with instrument constituencies (independence of solutions, heterogeneity of the constituency, etc.), it nonetheless provides a good example of what can be considered socio-material infrastructure.

4.5 Relationship of instrument constituencies with the policy process

A central proposition related to the concept of instrument constituencies is that they advocate for their preferred policy solutions independently of specific problems (Simons and Voss, 2018). This means that in order to sustain or expand the implementation of a policy instrument, an instrument constituency is expected to actively try to attach its favored solution to different policy problems as circumstances change.

Empirically, one would expect that a mature instrument constituency—one that has existed for an extended period—has already adjusted the framing of its instrument at some point to attach its solution to new problems that became salient over time. This can be observed through the changed framing of the instrument's rationale over time by the instrument constituency. Stronger evidence for this proposition can emerge from confessional accounts provided by participants in the policy process, detailing how certain actors have deliberately reattached their preferred solution to varying problems over time.

Evidence that the constituency actively tried to attach the solution to different problems is important for its higher levels of theoretical uniqueness. Béland and Howlett (2016, p. 394–396) offered detailed reflections on the theoretical relevance of problem independence, reflecting on how instrument constituencies differ in this regard from advocacy coalitions and epistemic communities. On the other hand, if there are no attempts to reframe solution-problem connections over a longer period of time and amidst changing conditions in the 'problem stream' (of a multiple streams framework understanding), this may weaken the relevance of an instrument constituency explanation.

The case studies provide good examples of this point, which is important, as 'solution independence' is one of the most distinctive empirical predictions of instrument constituencies. Nicholls and Teasdale (2021) provided detailed reflections on how social investment in the UK over time was reframed by the instrument constituency: 'However, it soon became apparent that the policy instruments remained remarkably consistent. Instead, change concerned the meaning of social investment (the policy solution) and the policy problems to which social investment became a response to' (p. 805).

Blümel (2021, p. 551) described how assigned problem definitions have changed in the case of Germany's cluster policies, as the regional economic development rationale was replaced with internationally competitive research as the ultimate goal of the programs. Pischke and Wellstead (2020, p. 375) also convincingly presented how, in Mexico, the payments for the ecosystem services program's goals changed over time. While the policy instrument initially had an environmental focus, it later shifted to poverty alleviation, a markedly different problem. In a different approach, Svallfors et al. (2022) emphasized the vague and elusive nature of problem definitions in the analyzed Swedish health-care reports: 'What is being pushed in this networking of reports are instruments, particular policy solutions—such as "knowledge management" or "person-centered care"—while problems are often ill-defined backgrounds to the real issues in the reports' (p. 588).

'Proposition 9' posits that instrument constituency activities are expected to extend to all of the different parts of the policy process (Simons and Voss, 2018). In addition to their roles in modelling and evaluation, instrument constituencies are expected to be active across other phases of the policy process—often simultaneously in multiple venues—thereby creating 'trans-local and trans-temporal linkages' (Simons and Voss, 2018, p. 29). Their activities can cross many boundaries, and they can become active in different policy domains, promoting their favored instrument.

This proposition is also distinctive for instrument constituencies. This is because, in advocacy coalitions, coalition activities are not expected to span multiple policy subsystems and different stages (Weible, 2018, p. 63). Empirical observations thus can be theoretically unique as long as they reinforce that suspected members of the constituency are active across different policy domains in relation to the same policy instrument. Simons and Schniedermann (2021, p. 517–522) provided a detailed analysis of how the evidence-based policy constituency spread in the UK and internationally, also describing how it became connected to different stages of policymaking. Béland and Howlett (2016, p. 399–401) also provided good examples analyzing the trans-locality of instrument constituencies by describing the international spread of social insurance as well as pension privatization. Foli and Fenwick (2018, p. 118) described how the transnational instrument constituency actively promoted conditional cash transfers across several different countries to diffuse the instrument, and the same phenomenon was also detailed by Saguin and Howlett (2019, p. 359–360).

The last proposition addresses the instrument constituencies' relationships with politics (Simons and Voss, 2018). Instrument constituency activities can effectively 'black box' the discussion around the instrument into a technical framing to steer the political discussion away from it. Constituency members, in pursuit of broad support for the instrument's application, are expected to shape their activities in ways that promote and reinforce this 'depoliticization'. A more technical and less political discourse can decrease the possible contestation of the instruments' implementation. As Simons and Voss (2018) phrased it: 'The technical framing of policy solutions works to carve out apparently "apolitical spaces" of policy design that provide room for maneuver in political negotiations between antagonistic camps' (p. 17).

Nonetheless, it remains challenging to determine whether such broad political support was actually influenced by the actions of the instrument constituency, since the instrument constituency's emergence itself may also have been supported by a pre-existing, less politicized environment. Given that depoliticization is endogenous to this mechanism, it is difficult to establish to what degree the depoliticized nature of a discourse is a precondition for or a consequence of the instrument constituencies' existence.

Empirically, we can expect to find that an instrument constituency will keep a distance from overt politics to avoid interpretations that heighten political tensions or render the application of the instrument more partisan. We can expect the instrument constituency to seek cross-party support whenever possible. Keeping the language of discussions *overly* technical and treating different political sides as 'equally distant' can be the observed manifestation of such activities. Even if these expectations are confirmed, the observations still remain only moderately unique, as they may be true of other kinds of actors as well, like epistemic communities (epistemic community influence on decision makers in Zito, 2018, p. 47)

Concerning the relative difficulty of empirical operationalization, it is not surprising that detailed demonstrations of this proposition were not available in all the case studies, but there are exceptions. Simons and Schniedermann (2021) offered an in-depth analysis of how the technical framing of 'evidence-based policy' practices helped the instrument constituency to spread its preferred meta-instrument. Perl and Burke (2018) provided insights about the politics of fuel taxation, connecting the parallel activities of an advocacy coalition and an instrument constituency: 'A bipartisan advocacy coalition espoused user fees as a legitimate and preferred solution to meeting America's transportation needs. Ideas about mobility, finance and de-politicized expertise melded easily across subsystem participants' (p. 94). The authors found that the initial technicalized framing contributed to the lock-in of the instrument. They also demonstrated that, while the issue was largely depoliticized in the United States, it was surrounded by greater political conflict in Australia, yet the instrument constituency grew significantly stronger in the United States. It can also be noted that not all of the observations that are related to politics are necessarily connected to this proposition. While Nicholls and Teasdale (2021, p. 803) also analyzed the bipartisan support for social investments in the UK, their evidence is more related to shifting problem definitions than to 'black-boxing' and technical framing.

5 Discussion

5.1 Case study findings are broadly in line with empirical expectations

The reviewed case studies found various empirical evidence that supports propositions associated with the concept of instrument constituencies. The relevance of the concept was confirmed across diverse policy domains, providing evidence for the emergence and influence of different instrument constituencies. Studies corroborated the emergence of a network with collective actor qualities, centered around a policy instrument or set of instruments. Theoretically, more unique empirical expectations, such as problem independence, the 'trans-locality' of instrument constituencies, and the heterogeneity of constituent actors and their motivations, also receive support in most of the case studies.

5.2 More consistent case studies could help theory development

The case studies reviewed here do not uniformly address each proposition; instead, they typically focus on some propositions in much more detail than others. While a narrow focus can be justified, it makes it somewhat difficult to compare them and draw inferences about the advancement of theory. As not all the empirical predictions connected to the propositions are unique to instrument constituency explanations, case studies should more consistently reflect on those expectations that are theoretically more unique in order to strengthen their findings. It would also be desirable for case studies to reflect on how their findings differ from functionalist explanations and from other explanations that rely on collective-entity concepts in policy process scholarship. Differentiating the concept from other collective entities can yield more robust theoretical inferences, and comparisons with a functionalist approach can further strengthen the practical relevance of the findings, as functionalist interpretations are widely used in policy-making.

Analysis of the case studies also raises questions about whether the emergence of an instrument constituency is contingent on certain characteristics of a policy setting and how different kinds of collective entities might prevail in different contexts. Recent work in policy process scholarship points towards the so-called 'toolbox' usage of different policy process theories (Weible, 2018, p. 71). In this understanding, different theorized collective entities can provide useful explanations for different policy outcomes. This can also be an important future direction for research that can benefit from nuanced comparisons between instrument constituencies and other types of conceptualized collective entities.

5.3 Practical implications: Oversupply of instruments, locked-in solutions

Most of the analyzed case studies had clear ambitions to apply the concept to provide a useful explanation for their cases, as well as to generate practical implications. In many cases, they reinforced the existence of negative consequences that instrument constituencies can generate. The activities of instrument constituencies can be associated with overinvestment in certain policy instruments that then induce path dependence. As Falkenström and Svallfors (2022) noted: 'Substantial resources in terms of tax money and time are now invested in "knowledge-driven management," resources that could have been used for other purposes' (p. 1054).

Others have reached similar conclusions; for example, Pischke and Wellstead detailed how the activities of the instrument constituency likely crowded out more effective conservation programs in Mexico (Pischke and Wellstead, 2020, p. 371). Perl and Burke (2018, p. 93) described in detail how instrument constituency activities locked in a solution that, over time, became increasingly less effective at serving its purposes in the U.S. They compared it with the Australian situation, where the instrument constituency did not have a similar success in locking in its preferred solution.

Svallfors et al. (2022, p. 593) also presented another kind of risk that is associated with instrument constituencies. The coalescence of actors into an instrument constituency that produces most of the available expert reports can also provide opportunities for special interests to infiltrate this network. Special interests can thus more effectively divert the instrument away from its originally intended purpose. The authors' notion points to the need to better understand how instrument constituencies relate to specific interests and lobbying.

Regarding the mitigation of potential negative effects, Zito (2018, p. 48) noted that the production of epistemic knowledge and influence can be enhanced when the instrument inherently incorporates processes of reflection and revision into its implementation. If the design of the instrument needs to be evaluated from time to time in such a way that alternative solutions are also broadly considered, this can increase the possibility that evaluations remain more independent and induce better reflections on instrument effectiveness.

6 Conclusion

This article has provided an overview of how the concept of instrument constituencies was applied in empirical case studies and what it is possible to say about the theoretical weight of the empirical evidence they found. To date, the application of the concept of instrument constituencies has been a slowly growing research theme. While case studies are not numerous, they have already confirmed the causal relevance of instrument constituencies across various policy topics, including environmental, social, health care, evidence-based, innovation, immigration, and fiscal policy. These cases all offered evidence for assessing the key propositions of the original authors of the theoretical concept (Simons and Voss, 2018). The case studies have also reinforced the important practical implication that the presence of an instrument constituency can lead to path-dependent policy outcomes, resulting in overinvestment in preferred policy instruments and neglect of other viable alternatives.

Looking at the propositions and the case studies in detail, it can be seen that not all associated empirical expectations and observations have the same degree of theoretical uniqueness, as not all of them are exclusive to explanations that rely on the concept of instrument constituencies. The confirmatory power of the case studies depends on whether the more distinctive expectations have proven true. The propositions by Simons and Voss (2018) that can generate the most theoretically unique expectations are *Proposition 8*, concerning the disconnectedness of solutions from problems, and *Proposition 9*, concerning the spread of instrument constituency activities across the policy process (trans-local and trans-temporal qualities of their activities). Other observations with relatively high theoretical uniqueness, like evidence about the heterogeneity of the instrument constituency and the clear neglect of other policy solutions as viable alternatives, can further strengthen inferences about the emergence and activities of instrument constituencies.

Some of the case studies have provided strong evidence for these expectations, with a higher degree of uniqueness, along with convincing descriptions of how instrument constituencies influenced policy outcomes. On the other hand, not all case studies establish equally well how the observations are different from the expectations of other relevant alternative theoretical explanations. A more consistent approach to reflecting on the propositions and empirical observations can accelerate the development of theory and advance the broader field of policy process scholarship. This paper also shows that assessing the theoretical uniqueness of predicted evidence, as described by Beach and Pedersen (2016), can be fruitful for case studies that rely on theories of the policy process and add clarity to research in this line of scholarship.

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Navigating between meaningful ideas and meaningless practices: Experts' views on youth public participation in Finland and Poland

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Abstract

This article examines the participation of young people in public life. Drawing on expert interviews and policy analysis, the study explores how institutional frameworks, political culture, and societal norms shape youth participation mechanisms and influence their ability to move beyond tokenism. In Finland, the Nordic welfare model, high institutional trust, and established youth policy frameworks create favorable conditions for engagement, yet reliance on formal representative structures often limits its responsiveness to spontaneous or grassroots initiatives. In Poland, the post-socialist legacy of low institutional trust, political polarization, and weaker traditions of structured civic dialogue contributes to the marginalization of youth voices. The findings highlight common barriers in both countries, including an overreliance on representative mechanisms, insufficient feedback loops, and the exclusion of marginalized youth. Theoretically, the study reaffirms the relevance of the 'invited' versus 'invented' spaces framework for cross-national analysis and underscores the need for intersectional approaches to youth participation. Practically, it offers recommendations for policymakers, educators, and participation facilitators, emphasizing the need to diversify participatory opportunities, broaden the scope of youth influence, and foster intergenerational dialogue.

Keywords: *youth participation, experts' views, local governance, recommendations, Poland, Finland*

1 Introduction

The contemporary generation of young people is confronted with a constellation of complex and interrelated challenges arising from global political instability, armed conflicts, and the enduring effects of neoliberal capitalism. These dynamics have contributed to heightened levels of precarity, forced migration, and identity disruptions, as youth navigate increasingly uncertain life trajectories. The neoliberal paradigm, characterized by the valorization of individualism, economic competition, and consumerist logic, has profoundly shaped the structural conditions under which youth transition to adulthood (Butler and Coward, 2024). The COVID-19 pandemic has further exacerbated existing inequalities and vulnerabilities, particularly in relation to mental health and socio-cultural development (Radzik-Maruszak and Szulc-Wałecka, 2025). Within the European context, young people face additional ongoing difficulties such as labor market insecurity, delayed economic independence, and diminished prospects for self-sufficiency and psychosocial stability (Berry and McDaniel, 2022; Haikkola et al., 2022; Honkatukia and Rättilä, 2023; Jaatsi and Kymäläinen, 2023; Mrozowicki and Kajta, 2021). These conditions have prompted an intensified scholarly and policy-oriented focus on youth well-being and social inclusion, underscoring the necessity of integrating youth perspectives into broader socio-political frameworks and decision-making processes.

There is a growing consensus that young people must be heard and actively engaged in matters that directly impact their lives. However, the recognition of the right of non-adults to express their opinions on issues affecting their quality of life has been a protracted process. The United Nations Convention on the Rights of the Child (UNCRC), established in 1989, formally acknowledged the right of children to participate in societal affairs. The concept of youth participation encompasses a broad spectrum of interpretations, forms, and opportunities. Interestingly, while some countries adopt a formal approach by developing public policies and legal frameworks to facilitate youth participation, others favor informal solutions and democratic experiments (Juusola and Varsaluoma, 2023; Weiss, 2020).

Young people's experiences of public participation cannot be understood without taking into account the broader societal and cultural contexts in which they are embedded. This article examines experts' views collected during focus group interviews on youth participation in two different settings – Poland and Finland – with particular emphasis on the *instruments for* and *areas of* youth engagement in public life. The experts' opinions are crucial in this context because they provide informed, evidence-based insights that can critically assess and shape effective strategies for enhancing youth participation in public governance, ensuring that such initiatives are both meaningful and impactful. Additionally, they provide data to link macro- and micro-level analyses of youth engagement (Von Soest, 2023, p. 278).

Finland and Poland were selected for this study because they represent markedly different yet comparable contexts for analyzing youth local participation. Finland, as a Nordic welfare democracy, combines a long-standing culture of citizen engagement, high levels of institutional trust, and well-developed youth policy frameworks (OECD, 2021). Poland, by contrast, is a transition democracy still in the process of institutionalizing participatory mechanisms, with lower levels of institutional trust and more fragmented youth policy arrangements. Despite these structural differences, both countries maintain formalized mechanisms for youth engagement, such as youth councils, yet face similar challenges in ensuring that these mechanisms move beyond tokenism to have meaningful influence. This contrast–similarity dynamic makes Finland and Poland a valuable comparative pairing for examining how political culture, institutional design, and societal norms shape the level and nature of youth participation.

The paper is structured as follows: first, we discuss the concept of youth participation in public governance, presenting arguments both for and against the involvement of non-adults in (local) decision-making processes. We then provide an overview of the youth participation instruments available in Finland and Poland. Subsequently, we introduce our data, methods, and research findings. We conclude that, while youth participation is officially promoted in both countries, its practical implementation frequently adheres to conventional and conformist forms of engagement, resulting in ambiguous outcomes. In the context of these findings, we propose several practical recommendations for policymakers and facilitators of participatory processes.

2 Youth engagement in public matters: Overcoming the hurdles

While participation has been a focal point of research for several decades, the study of youth participation is a relatively nascent field. The issue of public engagement among youth remains neither universal nor a leading topic in public discourse (Bessant, 2004; Tsekoura, 016b). Non-adults are often regarded as peripheral participants in participatory processes and are less frequently recognized as full-fledged actors in decision-making. Several critical issues arise within this context. First, it is frequently acknowledged that formalized decision-making processes, predominantly based on representative democracy, permit legitimate democratic participation only to individuals who meet certain criteria, such as age, experience, or specific types of knowledge. Consequently, the political agency of youth is often excluded, as their opinions are not deemed politically relevant according to adult-centric standards (Bosco, 2010; Häkli and Kallio, 2019; Tisdall and Davis, 2004). Second, as a corollary of the above, young people are often perceived as laypersons lacking the requisite social and political background to effectively articulate their views (McKay, 2014).

Some scholars argue that young people cannot fully exercise rights until they are capable of assuming responsibility (Matthews et al., 1999, p. 136). This perspective positions them as *objects* rather than *subjects* of policymaking, as evidenced by the fact that most public authorities and NGOs work *for* young people rather than *with* them (Lehtonen and Radzik-Maruszak, 2024). Consequently, inclusive governance is significantly constrained. Conversely, involving non-adults in governance necessitates the careful design of instruments and methods that enable their meaningful incorporation into decision-making. However, this poses substantial challenges for elected officials, bureaucrats, and adult citizens, often resulting in a participatory agenda that is built on pseudo forms of involvement, such as manipulation, decoration, or tokenism. In such cases, young people have little or no control over their participation (Arnstein, 1969; Hart, 1992).

In recent years, there has been a notable shift in the approach to youth participation. The influence of international organizations, which have fostered a trend toward the involvement of young people by grounding their right to participate in public life within the framework of fundamental rights, has been particularly significant. The academic literature offers numerous arguments in favor of involving youth in decision-making processes. As Mannermaa (2007, p. 140) notes, 'A person has to train to be a player in democracy at an early age. Each generation has to study the principles of democracy and civilization right from the basics' (Gretschel et al., 2011, p. 15). It is unreasonable to expect young people to acquire civic knowledge and skills without practical experience (Hart, 1992). Therefore, fostering citizenship and creating meaningful forms of involvement are essential for the development of future civil society (Biesta and Lawy, 2006; Mannermaa, 2007). Young people should have opportunities to express their views, effect change, and approach issues differently from adults (Matthews et al., 1999).

Early inclusion in decision-making processes can contribute to the empowerment, competence, and connection between non-adults and adults (Zeldin et al., 2007). Additionally, youth participation may increase their interest in and propensity for community service, political action, and other forms of public engagement (Bessant, 2004). Youth should be recognized as a valuable resource for policymakers and regarded as experts who offer unique perspectives and insights. Moreover, they possess knowledge and competencies that can be crucial for the formulation, implementation, and evaluation of local policies (Sińczuch, 2015). Furthermore, youth engagement can lead to more efficient and effective policies, enabling communities to implement lasting improvements that youth will support (Collins et al., 2016; Frank, 2006;

Mitra, 2005). Conversely, disregarding the potential of young people as stakeholders in the public sphere and questioning their role as '*experts*' in public affairs can adversely affect the quality of public services and their alignment with young people's expectations. Additionally, undermining their social rights may result in the long-term disengagement of this demographic from public affairs, leading to an irreversible loss of social capital that, if untapped, may accumulate in other areas of public life.

Similar to adult practices, youth participation can manifest in both formal and informal modes (Bherer et al., 2023). Formal participation is typically associated with institutional arrangements that are imposed top-down, formalized, and embedded within a specific political and legal framework. As Juusola and colleagues (2023) observe, most available forms of participation are tokenistic and, simultaneously, unattractive to young people. According to these authors, formal participation often serves as a 'bypass' to draw attention to particular groups – most frequently those who are marginalized, underrepresented, ignored, or diminished. The objective is to create institutional settings, referred to as 'invited spaces' within public arenas that address adolescent issues (Cornwall, 2004; Kersting, 2013). The rules governing these spaces, the degree of openness to young citizens, and, consequently, the potential for youth to influence the public sphere, are determined by the authorities. As a result, the functionality of these spaces and the role of young people within them are contingent upon the context and the perception of participation by public authorities (Cornwall, 2008; Tsekoura, 016a).

Therefore, despite the formal existence of participatory institutions for youth, their role in public life can be diminished or even reduced to a mere facade. Tsekoura asserts that institutions of participation dedicated to young people often replicate the issues found in adult participation. They largely 'copy' solutions characteristic of representative democracy, allowing only a select few young people who can navigate formal rules to participate in these formalized and institutionalized spaces (Tsekoura, 016a, p. 329). Cornwall (2008, p. 278) emphasizes that 'being involved in a process is not equivalent to having a voice'. The mere existence of institutional arrangements is insufficient to guarantee meaningful participation in decision-making processes; political will on the part of decision-makers is also essential. Conversely, informal participation occurs outside the official channels sanctioned by the state, providing an alternative to institutionalized forms that are often perceived as unwelcome or unfamiliar by youth. In this way, 'invented spaces' emerge from bottom-up initiatives that are widely accepted and preferred by young people. These spaces can encompass a range of activities, including protests, various forms of resistance to established institutions, and the everyday routines typical of youth (Kersting, 2013, p. 271). However, Juusola and Varsaluoma (2023, p. 96-97), drawing on Finnish experiences, note that informal participation, while favored by youth, is often viewed unfavorably by decision-makers.

3 Youth participation in local governance: The experience of Finland and Poland

Finnish and Polish self-governments represent distinct governance models: Nordic, and Central and Eastern European, respectively (Loughlin et al., 2012). These models differ in terms of values, traditions, and experiences related to citizen involvement in public affairs (Bäck and Kestilä, 2009; Lasinska, 2013). These differences are also evident in the realm of young people's participation.

Like other Nordic states, Finland has been at the forefront of incorporating youth perspectives into public administration, exemplified by the establishment of the Office of Ombudsman for Children (Law on the Ombudsman for Children 21.12.2004/122). Interest in youth participation has been prominent in Finland for the past 20 years, driven by two main justifications. First, the United Nations Convention on the Rights of the Child *(United Nations, 1989)* grants young people the right to be heard in decisions that affect them. Second, it is believed that participation experiences at a young age strengthen democratic values and equip young people with the skills needed to influence politics. Currently, Finland's structures for youth participation are outlined and governed by several laws. One of the most significant regulations is the Youth Act (1285/2016), which seeks to enhance young people's engagement in society based on guiding principles such as transnational interaction, cultural diversity, healthy lifestyles, sustainable development, and environmental respect. The Act mandates the preparation of a cross-sectoral program for youth work and youth policy, detailing four-year goals (Juusola and Varsaluoma, 2023). Other laws guarantee the voice and involvement of young people in welfare and other social activities, including the Basic Education Act (628/1998, 47a§), which affirms children's rights to express their views on education, and the Early Childhood Education Act (36/2016, 7b§), which emphasizes the importance of hearing children's opinions in the planning, implementation, and evaluation of early childhood education (Vlasov et al., 2019). Additionally, the Child Welfare Act (417/2007, 5§) prioritizes the child's own opinion (Pösö and Enroos, 2017). Young people also have the right to voice their opinions and participate based on the Land Use and Building Act 132/1999 and the Local Government Act 410/2015. Moreover, the Finnish Government is required to adopt a specific youth policy development program every four years (Council of Europe, 2011). The National Youth Work and Youth Policy Programme 2020–2023 (VANUPO) outlines the diversification of instruments for youth participation and direct democracy for young people (Ministry of Education and Culture, 2020).

In Poland, the concept of young people's participation emerged alongside the democratic transformation and the ratification of the UNCRC in 1989. Numerous initiatives, including the establishment of the Ombudsman for Children, have focused on the public rights of children and young people, although not specifically on their participation in public life (Brzozowska-Brywczyńska, 2021). Unlike Finland, despite the growing emphasis on youth inclusion and actions taken, for example, by the EU, Poland has lacked strategic solutions and youth policies that would support public participation (Gąsior-Niemiec and Kotarba, 2014). This omission was also evident in the National Action Plan for Children 2004-2012, 'Poland for Children', adopted by the Council of Ministers in 2004 (NPD, 2004). The document did not address the participation of young people in public life but rather focused on the protection of their rights, including the right to life and health, education, poverty prevention, and addressing familial and other life-related risks (Podlewska et al., 2019). Public participation issues were also only minimally addressed in the State Strategy for Youth for 2003-2012 and the Government's Youth Social Activity Program for 2015-2016, 'Active Youth' (Gąsior-Niemiec and Kotarba, 2014; Kochman, 2022; Zielińska, 2009). Slight changes became visible in the second decade of the twenty-first century when Poland finally developed institutions dedicated exclusively to young people or co-created by them (Rodziewicz, 2016). These include the Council for Dialogue with the Young Generation, the Youth Climate Council, the Youth Justice Council, and the Government Plenipotentiary for Youth Policy (Kochman, 2022). In 2022, the Polish government adopted the first national program to promote youth community and public activity, as well as bottom-up youth initiatives – the Government Youth Fund Program for 2022-2033 (Rada Ministrów, 2022).

In practice, youth participation in both countries takes on various, yet at the same time, similar forms. Finnish and Polish local authorities are required to establish formal participatory institutions that enable young people to engage in local matters. In both countries, youth councils (YCs) are the most common and strongly legislated instruments that allow youth to influence local decision-making. In Finland, YCs represent young people's views and ensure their opportunity to influence the planning, preparation, execution, and monitoring of activities related to the well-being, health, education, living environment, housing, or mobility of the municipality's residents (Section 26, Local Government Act 410/2015). In 2017, it was estimated that 80 percent of Finnish municipalities had such bodies (Valtiovarainministeriö, 2017). In Poland, youth councils have been operational since the early 1990s. However, in 2021, the regulations concerning these councils were amended, granting them slightly more powers. Currently, they consult, advise, and initiate actions at the local level. It is estimated that around 500 YCs operate across Poland (Wyrzykowska and Zapolski-Downar, 2021). Furthermore, in both Finland and Poland, many municipalities are experimenting with other democratic innovations dedicated to young people, including youth and school participatory budgeting (Lehtonen and Radzik-Maruszak, 2024).

4 Methodology

This study employs a comparative qualitative approach to analyze expert perceptions of youth participation in Poland and Finland. The research is based on two virtual focus group interviews with eleven experts from both countries, specializing in youth participation, governance, and public policy (*Appendix*). The study follows the Most Different Systems Design (MDSD) approach, selecting Finland and Poland for their contrasting political cultures, historical legacies, and governance models (Anckar, 2008). While Finland, as a Nordic welfare democracy, has a well-established participatory culture, Poland, a post-socialist democracy, continues to face challenges in institutionalizing youth engagement.

For the purpose of this study, 'experts' are defined as key informants in the field — individuals responsible for investigating, developing, implementing, and evaluating policies, strategies, or solutions related to youth participation (Meuser and Nagel, 2009). Their extensive experience and specialized knowledge provide critical insights into youth engagement in decision-making processes. This research intentionally focuses on their perspectives to uncover the complexities and nuances of youth participation, offering a critical evaluation of existing approaches.

The expert focus group interviews were conducted as an initial phase of the project, serving as a preliminary exploration before engaging with other stakeholder groups involved in youth participation. By consulting external specialists (Kallio et al., 2016), the research team aimed to test and refine initial assumptions, ensuring a well-grounded analytical framework. Each focus group discussion was structured around two core themes: 1) forms of youth participation – assessing both formal mechanisms (e.g. youth councils, participatory budgeting) and informal engagement (e.g., protests, digital activism); and 2) youth autonomy and decision-making power – examining the extent to which young people influence governance structures.

Experts were selected using purposive and snowball sampling, ensuring representation from academia, policymaking, and civil society organizations.[1] Each session lasted 90 minutes, was transcribed verbatim, and analyzed using qualitative content analysis with MAXQDA software. The coding process involved an initial set of predefined categories derived from the literature (e.g., institutional vs. non-institutional participation, youth

[1] To enhance transparency, an anonymized list of experts, including their country of residence and research field, is provided in the Appendix.

autonomy, decision-making power) and was supplemented by inductively generated codes emerging from the data (e.g., perceptions of tokenism, political engagement, inclusion and exclusion of marginalized youth). To ensure comparability and reliability, coding was double-checked by independent researchers from both country teams. Given the scope of this article, only selected excerpts from the expert interviews are cited in the following sections to illustrate key findings[2].

5 Results and discussion

5.1 Forms of youth public participation

The creation of participatory instruments is determined by the nature of the political system, the level of institutional trust, the experience of societies in using democratic mechanisms, as well as other contextual factors (Hruška and Balík, 2025; Willems et al., 2020). At the same time, experiences across many countries indicate that youth public participation often mirrors the forms of engagement seen among adults, such as youth councils and participatory budgeting. The analysis of the interviews revealed differences in the experts' approaches to those issues, which translates into different understandings of participation and the use of participatory institutions.

Experts from both countries agreed on the need for combining formal and informal instruments of youth public participation. In Finland and Poland, youth councils are the primary, formal mechanism for involving young people in public affairs. At the same time, though the formalization and institutionalization of participatory instruments may be essential in democratizing societies, this approach raises questions and doubts. First, one of the Polish experts drew attention to the purpose of setting up institutions and their role in society. He asked:

> What is the role of the participatory institution designed for young people? Is it meant to be part of the community or simply a clique that serves to get its foot in the door?
>
> (E2/FGI/PL)

The Poles additionally underline different reasons for creating institutional arrangements.

On the one hand, youth public participation is driven by bottom-up, spontaneous initiatives supported by local community leaders, teachers, or local authorities (Vromen and Collin, 2010). On the other hand, top-down and instrumental activities (with political inspiration) can be observed. Additionally, contrary to Finland, the problem is a lack of a coherent youth policy in Poland, as one of the experts stated.

> In the case of Poland, it is difficult to pinpoint the reasons for institutionalizing participation mechanisms because there is a de facto lack of a youth policy that addresses participation issues.
>
> (E2/FGI/PL)

Therefore, there are doubts related to the factual motivation for institutionalization. Second, as one Finnish expert pointed out, well-known, formal instruments such as YCs attract only some 'types' of young people. He addressed this problem in the following way:

> I also saw that for many people, participants, youth participation actually only accumulates privileges because they are already very competent young people. They're very active citizens, they're engaged in NGOs, in school, student councils, and so forth … For them, access to

[2] Excerpts from interviews cited in this paper have been quoted verbatim, without corrections or editing.

> another channel of participation just means that they're accumulating political capital, and social capital and further developing their competences.
>
> (E2/FGI/FI)

In this context, formal public participation includes youth that is already active and excludes those individuals who are unable to smoothly navigate among established rules and those who are withdrawn, shy, or come from vulnerable groups and backgrounds (Bečević and Dahlstedt, 2022). Additionally, formal mechanisms can be dominated by a small group of the most active adolescents, who use them to pursue their own goals rather than those of the community. Importantly, experts cautioned against treating youth as a homogeneous category. Both in Finland and Poland, formal mechanisms of public participation tend to attract young people with higher levels of social and cultural capital — those from more affluent backgrounds, with supportive families, or with prior civic experience. Young people from working-class backgrounds, rural areas, or those identifying ethnic minority communities often face additional barriers to engagement, including limited access to information, financial constraints, and experiences of discrimination. Without targeted outreach and support, participatory processes risk reinforcing existing inequalities by privileging those already empowered to navigate formal structures. From this perspective, institutionalized forms of public participation may not perform the task for which they were created, e.g., by polarizing youth, excluding some individuals or groups. Moreover, the institutionalization of forms of public participation of young people is apparent. Although the number of participatory instruments is increasing, young people are not involved in decision-making. Youth public participation thus does not often expand beyond the voicing of opinions. Finally, experts from both countries are also concerned about the ineffectiveness of institutionalized participatory instruments. The instruments are often created for young people without genuine involvement, leading to their passivity and a lack of youth interest in public issues (Huttunen, 2021). One Finnish expert pointed out in this context:

> In some cases, when such venues or activities fail to engage young people, they position themselves as spectators of society, assuming the role of outsiders.
>
> (E2/FGI/FI)

The above statement pertains to instances in which individuals signal their disapproval of institutions that they perceive as misaligned with their interests or values. According to Finnish experts, this dynamic can be observed in the context of electoral cycles: relatively low voter turnout among young people may, on one level, constitute an act of dissent or resistance (Antila, 2019; Huttunen, 2021), while on another, it may represent a deliberate and strategic mode of engagement with public affairs, expressed through the conscious choice of non-participation (E3/GFI/FI). The search for other, non-formal, and institutionalized forms of participation may also indicate a lack of agency and the perception that institutional activities do not produce any results. Another reason is that young people rarely have a chance to control the outcomes of formal, institutional participation. At the same time, what was particularly stressed by Polish experts is that both institutional and non-institutional activity is a prerequisite for young people to be engaged in public life. According to one expert:

> If there is no space for activity – institutional or non-institutional – it is hard to look for activism, or we will simply conclude that young people are not present, disengaged, and they just do not exist in the public space.
>
> (E2/FGI/PL)

Finally, the distinction between 'invited' and 'invented' spaces provides a useful lens for comparing both countries. Invited spaces — formalized arenas such as consultations or youth councils — are structured and regulated by public authorities, often reflecting top-down agendas. Invented spaces, by contrast, emerge from youth-led initiatives outside institutional control, including protests, social media campaigns, and grassroots community projects. Finnish experts noted that municipal authorities occasionally attempt to integrate invented spaces into formal decision-making, for example, by inviting climate strike organizers to policy discussions. However, these invitations tend to be selective and often channel activism into predefined, less confrontational formats. In Poland, experts emphasized that invented spaces are more likely to be ignored or even stigmatized by authorities, particularly when they involve contentious political issues. This divergence highlights the differing political cultures and degrees of openness to bottom-up civic energy in the two countries.

5.2 Areas and autonomy of youth participation

The research indicates that not only are forms of participation important, but also the matters in which one can have a say. In theory, especially in Finland, the legal framework allows for involving young people in 'serious' public affairs. In reality, youth councils have the right to be *heard* in various areas of public affairs, rather than influence them (Council of Europe, 2011; Henriksson, 2020). The analysis of experts' statements indicates, however, that in both Finland and Poland, young people are mainly involved in trivial matters. They do not participate in city planning or designing neighborhood areas, but rather in creating local playgrounds, planning menus in school cafeterias, or buying equipment for teaching rooms. One of the Finnish experts addresses this issue in the following way:

> We should be able to look more critically at those sectors that young people are able to influence. Are they the immediate surroundings of young people? Such as schools? And how well they can influence other issues, for example, urban planning? These are critical issues. There are limits to what young people can do.
>
> (E1/FGI/FI)

The mentioned Finnish expert added:

> I've interviewed mayors [about youth participation], and they usually mention skate parks, which is an obvious example that young people have expertise in them. But critically speaking, we have talked about skate parks for 15 years. Maybe it is time to talk about other things as well, such as urban planning, social and health services, museums, and cultural services.
>
> (E1/FGI/FI)

An expert from Poland made similar observations:

> If you look at the UN documents on children's participation, these say that the child has the right to have a voice. That doesn't mean 'childish' things like playgrounds and so on. But in all matters like architecture and transportation as well. These are also issues that affect children. They influence them as citizens, so it's quite obvious that children should be included. But here, there are cultural issues and ideas about the child's place in society, limiting them to only what they need. So, we limit this participation only to playgrounds. And this is also important. But that's not all.
>
> (E3/FGI/PL)

The adult architects of public participatory processes conceive that young people can only be involved in less important matters (Achremowicz, 2020; Juusola and Varsaluoma, 2023; Kopińska, 2018) or even discourage them from engaging with public issues (Feldmann-Wojtachnia et al., 2010). The lack of support for youth participation is expressed, however, in the immediate environment of young people, such as by family members or teachers. One Finnish respondent addressed this issue in the following way:

> School rules might say that young people can have an influence. But in practice, teachers might say that, well, you know it's really important that you participate, but look, we have the mathematics exam, and you need to study for math. So please don't do that [get involved in public matters] and [just] come to the mathematics lesson.
>
> (E1/FGI/FI)

Against this background, experts from both countries emphasize that adults still dominate the process of youth public participation. In the Polish case, it was additionally stressed that this is culturally determined, as the division between the worlds of youth and adults has long been a feature of the country. Such an approach does not build young people's confidence or strengthen their sense of agency or ability to influence public affairs. The analysis of expert interviews also indicates the importance of ensuring the autonomy and transparency of institutions that allow youth to be involved in public affairs (Jarosz, 2016). One Polish panelist emphasized that young people cannot be invited or 'used' only when adults need them. In this form, the participatory process serves only adults and is instrumental and a sham. She addressed this issue in the following manner:

> Sometimes, we think we cannot be participatory enough because we do not involve youth at all levels. That's OK. We don't have to involve them from A to Z. But we must be transparent about this. We cannot say: "We need your insights." And then we don't use their opinion. It is not fair. It's fair to say "we need your insights because we want to broaden our perspective and see things from more than one perspective".
>
> (E3/FGI/PL)

As Finland has a longer experience of youth participation (Aalto, 1975), experts from that country highlighted different aspects of the relationship between youth and adults. The panel interview analysis indicates that the problem is the lack of cooperation with young people and the inadequate communication between local authorities and youth. Young people expect feedback on the activities they have participated in or initiated. They lose trust and interest in public matters if such information is not returned to them. As an illustration, one of the experts provided the case of the construction of a local sauna.

> Children in early education wanted a sauna in the kindergarten. Moreover, it took ten years to organize the sauna. And then they were invited to the opening. It was ten years! So, when we talk about participation, we need to find a way to communicate with young people and think about the timeframe for activities. It is about interaction and how young people are informed about what happens when they say something and try to make an impact.
>
> (E1/FGI/FI)

6 Conclusions, implications, and further research

In recent decades, youth participation has increasingly been presented as a 'good thing' – something to be promoted and considered beneficial for all members of society (Tisdall, 2008). This issue appears even more relevant today, as young people and adults face numerous social, economic, and political challenges. The results of our study indicate, however, that despite more 'friendly' rhetoric and a growing number of instruments designed to promote youth involvement in public matters, engagement still encounters substantial barriers. These challenges are visible both in well-established democracies, such as Finland, and in countries with a turbulent past, such as Poland.

The first problem identified by experts concerns the prevailing approach to the organization of youth participation. Instruments dedicated to youth are largely based on representative mechanisms, with all their inherent weaknesses and drawbacks, including the tendency to involve those who are already active and engaged (Kiilakoski, 2014). In the view of experts, both countries lack spontaneous, one-off forms of engagement that differ from permanent, institutionalized solutions. At the same time, as Kersting (2013) observes, the pace and character of modern life often lead people to prefer short-term, spontaneous forms of activation rather than long-term solutions requiring sustained commitment. In both countries, a critical gap identified from a practical perspective is the insufficient attention given to the organization of the youth participation cycle and to the communication of its outcomes. Experts emphasized that young people often expect visible, immediate results from their involvement, reflecting their desire for tangible impact. Yet this expectation is frequently unmet within formalized participatory structures, such as youth councils, which typically operate with longer decision-making timelines. Without clear feedback mechanisms and transparent follow-up processes, youth engagement risks becoming superficial and tokenistic, ultimately undermining the motivation to participate in future initiatives.

According to experts in both Finland and Poland, young people tend to focus on areas traditionally associated with them, such as skate parks or school menus. The analysis, however, shows differences between the two countries. Finland, having implemented a youth policy many years ago, tends to involve young people in more substantial matters, although actions are still limited by institutional conformism and attachment to representative mechanisms. In Poland, shaped largely by its historical development, young people and their participation are not always taken seriously. Those under 18 are often perceived as being in a 'waiting room' on the way to adulthood. Moreover, a gap exists between civic and political activity: while the former is generally accepted and encouraged, the latter is often regarded by decision-makers as an area unworthy of investment.

From these findings, three main takeaways emerge. First, there is a persistent gap between the rhetoric of youth empowerment and the reality of participation, which remains constrained by structural and cultural barriers. Second, existing participatory structures often favor already active youth, leaving marginalized groups excluded and reinforcing inequalities (Augsberger et al., 2024; Cushing and van Vliet, 2017; Wyness, 2009). Third, thematic limitations restrict youth influence to narrow, age-specific topics, rather than enabling full participation in broader, more politically significant areas.

Additionally, from a theoretical perspective, our study reaffirms the relevance of the 'invited' versus 'invented' spaces framework for understanding youth participation in cross-national contexts, showing how political culture, governance traditions, and institutional trust shape opportunities for engagement and the reception of bottom-up activism. It also highlights the importance of adopting an intersectional lens, recognizing that youth are a heterogeneous group whose participation is influenced by socio-economic status, gender, ethnicity, disability, and geographic location. From a practical perspective, our results indicate the need for a paradigm shift in youth participation, moving beyond tokenistic involvement toward more inclusive and impactful engagement. While formal structures such as youth councils remain valuable, they should be complemented by more flexible, project-based, and informal opportunities capable of engaging a wider range of young people. Youth should be invited to contribute not only to matters seen as 'youth issues' but also to significant policy areas such as urban planning, education reform, climate action, and social services. Effective participation requires transparent communication and robust feedback loops, ensuring that young people's contributions are visibly acknowledged and acted upon. Without visible outcomes, there is a risk of disillusionment and disengagement. Capacity-building initiatives, including civic education and leadership training, are essential for equipping young people with the skills and confidence needed for meaningful engagement. Finally, a cultural shift in adult–youth relations is required, challenging adult-centric attitudes and fostering intergenerational dialogue based on mutual respect (Lehtonen and Radzik-Maruszak, 2024).

In conclusion, while Finland and Poland have taken important steps toward institutionalizing youth participation, significant work remains to ensure that young people are engaged not merely as symbolic actors but as equal partners in governance. Achieving this will require structural reforms, cultural change, and a sustained commitment to inclusivity, transparency, and mutual respect, enabling youth participation to become a transformative democratic practice that strengthens legitimacy and contributes to sustainable community development.

At the same time, certain limitations of our study must be acknowledged. The article presents only a portion of the collected research material and focuses primarily on expert perspectives. While the viewpoints of local authorities, officials, and young people themselves are indispensable for a comprehensive understanding of participation processes, they are not explored here and will be addressed in future publications. Future research should therefore include a wider range of stakeholders, expand the comparative framework to additional countries, and apply mixed-method approaches to capture both the depth and breadth of youth participation dynamics.

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Appendix:

Experts from Finland

(FI1) This expert is a researcher and practitioner affiliated with Tampere University. His work focuses on youth participation, democracy education, and the development of inclusive public policies for young people. He has extensive experience in both academic research and policy evaluation, with a particular interest in how institutional frameworks and educational practices can promote meaningful engagement and civic empowerment among youth.

(FI2) This expert is a researcher affiliated with the University of Jyväskylä, specializing in democratic education and youth participation. Her work focuses on the state and development of democracy education in schools, with particular attention to how educational practices can foster civic competencies and active citizenship among young people. She has contributed to both national and international projects examining participatory school cultures, student voice, and the role of education in sustaining democratic values.

(FI3) This expert is a researcher affiliated with Tampere University. She has research expertise in youth studies and social policy. Her work addresses issues of social inclusion, marginalization, and young people's encounters with institutions, often combining qualitative research with participatory methods. She has led and participated in numerous interdisciplinary projects exploring the intersections of youth, gender, migration, and social justice.

(FI4) The expert is a university researcher at the University of Helsinki, specializing in disability studies, inclusive education, and youth transitions. Her research focuses on the lived experiences of young people in education and employment, particularly those facing structural barriers to participation. She has extensive experience in qualitative and participatory research methods and has contributed to national and international projects on equality, accessibility, and inclusive policy development.

(FI5) This expert is a researcher affiliated with Tampere University. His research focuses on political sociology, youth and citizen participation, and the dynamics of democratic agency. A key work examines outcomes of institutional youth participation, identifying pathways such as transformation, accumulation, and exit among young participants in municipal youth councils and participatory budgeting processes.

(FI6) The expert is a senior researcher based at Tampere University. Her academic expertise focuses on youth engagement, media literacy, and inclusion, with particular emphasis on participatory media methods that support marginalized or at-risk youth. Over recent years, she has led and contributed to action-oriented research exploring participatory photography, multiliteracies, and creative media production as tools to foster agency, social inclusion, and critical engagement among young people.

Experts from Poland

(PL1) The expert is a practitioner, researcher, and lecturer at the University of Łódź, specializing in social pedagogy, youth participation, and civic education. Her academic work focuses on the empowerment of young people, participatory methods in education, and the development of inclusive spaces for civic engagement. She has been involved in national and international projects promoting democratic competencies among youth and has published on issues related to educational innovation and participatory practices in local communities.

(PL2) The expert is a political scientist and senior researcher presently based in Germany, specializing in local governance, public participation, and democratic innovation. His work examines participatory budgeting, citizen engagement in municipal decision-making, and the design of deliberative processes. He has coordinated and contributed to numerous European research projects on participatory democracy and has published extensively on institutional frameworks and best practices for fostering inclusive, transparent governance at the local level.

(PL3) The expert is a professor of social pedagogy at the University of Silesia in Katowice, specializing in children's rights, child protection, and the social participation of young people. Her research focuses on the implementation of the UN Convention on the Rights of the Child, mechanisms for safeguarding children's welfare, and the role of education in promoting civic engagement from an early age. She has served as an expert and consultant for governmental and non-governmental organizations, contributing to national and international initiatives on child protection and participatory rights.

(PL4) The expert is a cultural anthropologist and university lecturer at the Adam Mickiewicz University Poznań, with expertise in youth studies, migration, and identity formation. Her research examines the everyday experiences of young people in diverse cultural contexts, including issues of mobility, belonging, and intercultural dialogue. She has been involved in interdisciplinary projects combining anthropology, sociology, and education, and has published widely on topics related to youth, culture, and social change.

(PL5) The expert is an Associate Professor at the University of the National Educational Commission in Kraków, specializing in political science, civic education, and youth political participation. His research explores the political socialization of young people, democratic attitudes, and patterns of civic engagement, with a particular focus on comparative and longitudinal perspectives. He has participated in numerous national and international research projects on youth, democracy, and political culture, and his work has been published in peer-reviewed journals and edited volumes.

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The 'Uneven and combined development' of elderly care in Central and South-East Europe

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Abstract

The article examines the development dynamics of elderly care in countries along the core–semi-periphery–periphery axis. The geographical scope of the study is framed by international migration flows, focusing on four countries in Central and South-East Europe: Bosnia and Herzegovina, Slovenia, Austria, and Germany. The article demonstrates that, although their development trajectories vary, these countries together exemplify what Trotsky termed 'uneven and combined development'. In addition to the analytical study, we use two variables (from Eurostat and the World Bank) to illustrate how the social economies of core, semi-periphery, and periphery countries are related. The two variables indicate that, while the relative differences between the countries are decreasing, the absolute differences are increasing. The 'snowball effect' helps explain the region's uneven and combined development, in which inefficient and wasteful social economies – particularly in the core countries – play a role in addition to economic disparities between countries.

Keywords: *long-term care, institutional elderly care, labor migration, uneven and combined development, Central and South-East Europe*

1 Introduction

The shortage of care workers in the core countries of Europe is drawing labor away from the semi-periphery and the periphery (Arrighi and Drangel, 1986; Vieira, 2018; Wallerstein, 1976). This is extending the 'crisis of care' to the periphery (Fraser, 2017). Transnational labor migration thus inevitably entails institutional and developmental adjustments in countries where crises of care have newly emerged. This article examines the development dynamics concerning elderly care between the core, semi-periphery, and periphery in Central and South-East Europe, focusing on four countries in the region: Bosnia and Herzegovina (BiH), Slovenia, Austria, and Germany. These states are linked by inter-state migration in elderly care as sending or receiving countries, or both.

The analysis draws on previous comparisons of social care systems that examine tendencies, inconsistencies, and developmental trajectories rather than rigid national cross-sections (Albertini and Pavolini, 2017; Bettio and Platenga, 2004; Daly and Lewis, 2000; Saraceno and Keck, 2011; Simonazzi, 2009; Verbakel et al., 2023). They analyze social care systems at the intersection of the state, market, and family and consider various support instruments (cash and in-kind benefits for care), forms of care (either formal or informal), types of labor markets (formal, precarious, informal), as well as the public and private provision of services. This led Daly and Lewis (2000, p. 291-293) to identify two main paths of change in Europe: first, the market is assuming a greater role than before, and second, cash benefits are becoming a substitute for formal care. Simonazzi (2009) similarly exposes the two changes—the shift from institutional to home-based care and the shift from public to private procurement of services—and connects them with the emergence of informal labor markets in elderly care. When assessing public policies from the perspective of gender equality, Saraceno and Keck (Saraceno and Keck, 2011; Verbakel et al., 2023) also classify social policies along the lines of (de)commodification and (de)familiarization.

Of the four countries under consideration, studies frequently examine Germany and Austria, rarely Slovenia, and even more rarely Bosnia and Herzegovina. The Austrian and German care models are presented as unique in that they involve a private care model with public funding (Bettio and Platenga, 2004, p. 101) and cash benefits as a substitute for formal care (Daly and Lewis, 2000, p. 293) or an incentive for self-support (Simonazzi, 2009). Their care models have been observed to facilitate familiarization and only marginally decommodified defamiliarization (Saraceno and Keck, 2011; Verbakel et al., 2023). In contrast, Slovenia is only briefly mentioned in a group of countries with mixed policies, some of which support defamiliarization and others familiarization (Saraceno and Keck, 2011, p. 395). Bosnia and Herzegovina is not considered.

The article presents the perspectives of semi-peripheral and peripheral countries, which are often overlooked in comparisons of European care models. This approach involves an examination of care models on the core–semi-periphery–periphery axis. It implies that we are not simply interested in comparing the four mentioned countries and their care models. Our focus is on internal sectoral developments, coupled with the dynamics of development among countries affected by transnational migration. The concept we use to capture both aspects, the comparison and the dynamic processes, is *uneven and combined development* (Trotsky, 2017). This will help us understand the (re)shaping of care systems on Europe's margins.

In addition to comparative studies, researchers have produced many reports on social care changes in four countries. Their descriptions and analyses point to different development paths and outcomes in the countries studied (Blank, 2020; Bosch, 2015; Filipovič Hrast and Rakar, 2020; Hegelich and Meyer, 2009; Jusić and Obradović, 2019; Kolarič et al., 2009; Obradović, 2021; Obradović and Hirose, 2022; Österle, 2013; Österle and Heitzmann, 2020; Theobald and Hampel, 2013; Trukeschitz and Schneider, 2012; UN Women, 2023; Zuchandke et al., 2012). It can also be concluded that the modernization of the social care sector is being spearheaded by leading countries, with others following suit. Similar to comparative studies, country reports indicate that these changes have resulted in the emergence of welfare markets, suggesting that the private sector is becoming a significant force in the development of elderly care. Moreover, the four countries form a migration chain in which Bosnia and Herzegovina is a sending country, Slovenia is a receiving and a sending country, and Germany and Austria are receiving countries (Melegh, 2013, 2023).

Two questions emerge from these conclusions. Do institutional changes create a need for labor migrants (Hrženjak, 2019)? That is, are institutional developments responsible for labor shortages in the care sector, not only the usual suspect of a demographic crisis? Second, emigration and immigration link national welfare systems and inevitably require certain adjustments to be made between the systems. This raises the question of the direction of regional development in elderly care. Does it aim to reduce or increase uneven development between countries?

To answer these questions, the article draws on secondary sources and material collected during the *Transnationalisation of Care for Older People* research project. Interviews with stakeholders, including policymakers, care home directors, and trade unionists in Slovenia and BiH (19 interviews), as well as interviews with migrant workers in Slovenia (16 interviews), provided valuable information. Fieldwork was conducted in 2022 and 2023. Interviews lasted between 30 and 90 minutes and were conducted with the informed and signed consent of participants. All interviews were recorded, transcribed, and subjected to thematic analysis.

The investigation proceeds as follows. The study commences with Slovenia as a point of departure for the description of regional labor migration patterns in elderly care, given its intermediate position. The delineation of migratory patterns furnishes the geographical framework, encompassing four countries: Germany, Austria, Slovenia, and BiH. The group includes core, semi-periphery, and periphery countries. This characteristic makes the region a promising site for applying the concept of uneven and combined development. We then explain the models of elderly care in Germany, Austria, Slovenia, and BiH. Finally, we delve into the dynamics of regional development and substantiate our argument by analyzing statistical data on health and social protection spending. In the conclusion, we discuss the interlinking of care systems in the region.

2 Migration flows between South-East and Central Europe

We begin our description of regional migration flows in elderly care with Slovenia, where the financial crisis has triggered the emigration of care and health workers. In 2012, the sovereign debt crisis prompted the hasty implementation of austerity measures (Breznik and Furlan, 2015). These measures had a significant impact on the public sector (Hrženjak, 2018), resulting in wage cuts and a freeze on new hirings. This led many health and care workers to seek job opportunities abroad, particularly in Austria and Germany. By 2018, the expansion of private care homes and the withdrawal of austerity measures had turned the problem of surplus labor into a chronic shortage. Instead of increasing wages to attract new staff, care homes have filled their vacancies with foreign workers. Within a few years, by 2023, the share of foreign nationals had expanded to 7.8 per cent (Hrženjak and Breznik, 2024).

Among migrant workers, 60 per cent of foreign nationals working in care homes were citizens of Bosnia and Herzegovina. This was a result of emigration from BiH in the decade prior, when over 400,000 BiH nationals were looking for permanent or temporary work abroad,[1] mostly in Slovenia, Germany, Croatia, and Austria (Čičić et al., 2019; Domazet et al., 2020; Efendić, 2021; Jakovljević et al., 2021). As Slovenian employers generally employ men in the construction, manufacturing, and transport sectors, care homes started to recruit the wives of foreign workers who had come to Slovenia for the purpose of family reunification. Furthermore, they incentivized their employees to encourage relatives and friends to immigrate to Slovenia. With the help of the Employment Service, they organized job fairs in the countries of South-East Europe. The statistics already show results of these efforts: the share of women among those obtaining a work permit has risen rapidly, from 1.5 per cent in 2017 to 5.1 per cent in 2019 (Jakovljević et al., 2021, p. 10). This coincides with the growth in the proportion of female migrant workers in social care.

However, Slovenia is competing with high-wage countries for ‘labor reserves’ from Eastern Europe (Melegh, 2023, p. 174). In 2013, Germany concluded the Triple Win agreement with Serbia and Bosnia and Herzegovina to recruit nurses and technicians. By 2020, when Serbia cancelled the agreement, 800 nurses had left Serbia for Germany, and 600 from Bosnia and Herzegovina, where the agreement remains in force, by 2021. Many more left the countries individually or via intermediaries. Domazet et al. (2020, p. 147) estimate that 1,000 doctors, 200 specialists, and 2,500 nurses and technicians have left BiH in the last five years alone,

[1] World Bank, SM.POP.NETM (indicator), period 2011–2021.

primarily heading for Germany and Austria.

This brief outline gives an overview of the movement of labor between countries. To summarize, the emigration of health and care workers from Slovenia to Austria and Germany has caused a labor shortage. These workers are being replaced by migrants from BiH and other former Yugoslav republics, who are migrating in large numbers to Slovenia, Austria, and Germany. It is commonly believed that ageing societies draw care workers from less developed countries with younger populations. Although the proportion of people over 65 in the overall population varies from country to country, these variations are not that significant and are decreasing due to migration. By contrast, we will examine care systems closely to establish whether institutional arrangements themselves generate a need for labor in elderly care. Before proceeding, we offer some notes on the conceptual framework.

2 The concept of 'unequal and combined development'

The concept of uneven and combined development was developed by Leon Trotsky to explain why a proletarian revolution was possible in 1917 in a Russia that had neither the material prerequisites nor full capitalist development. Trotsky linked uneven development (of sectors within the state or of countries) to the law of combined development in the introductory chapter of *History of the Russian Revolution*. Here, Trotsky explains that while backward countries imitate advanced countries, they do not have to go through all of the stages of development and can skip some (which is why backwardness can also be a privilege). On this basis, 'a peculiar combination of different stages in the historic process' (Trotsky, 2017, p. 24) emerges; that is, 'an amalgam of archaic with more contemporary forms' (Trotsky, 2017, p. 25). Some 'contemporary forms' may be highly developed, but these aspects are dialectically complementary to the backwardness in other parts of society.

Even though Trotsky left only an introductory chapter and a few short passages, he opened up a new field of research. This theoretical potential was taken up by Latin American dependency theorists who, like Lenin and Trotsky before them, were confronted with the problems of peripheral capitalism. They recognized that they could only understand the situation of the periphery if they started from the position of capitalist world development as a structure of the whole into which the peripheral state is integrated via subordination.

This theoretical problem was addressed by early Latin American authors such as Raúl Prebisch, Celso Furtado, Osvaldo Sunkel, and others (Kay, 2011). The historical study by Fernando Cardoso and Enzo Faletto on the development of Latin American countries after they had freed themselves from colonialism and become independent states suggests that the external links with the world capitalist system (for example, the global demand for agricultural and mining products) determine the nature of the economy in peripheral economies (Cardoso and Faletto, 1979). According to their line of reasoning, external influences appear as internal forces, which shape national developments. Ruy Mauro Marini further defines the conditions of subordinated development, or 'development of underdevelopment' as famously coined by Frank (2009). He describes it as 'a relation of subordination between formally independent nations, in the framework of which the relations of production of the subordinate nations are modified and re-created to ensure the expanded reproduction of dependency' (Marini, 2022, p. 117). In our field of research, this means that national social care systems are developing interdependently, while external influences, such as cross-border labor demand for care workers, manifest as endogenous forces. These forces are rearticulated in many different forms but often create an 'expanded reproduction of dependency'.

However, they are not necessarily articulated in this way. Justin Rosenberg, who developed a new field of study based on the concept of uneven and combined development, showed the opposite with the case of 'Chinese shock' (Rosenberg and Boyle, 2019). The authors examined Western neoliberal economic policies of deindustrialization and China's rapid industrial and technological growth. The uneven and combined development of these two poles led to negative trade balances, labor polarization, growing inequalities, and, finally, two dramatic events in 2016: the election of President Donald Trump in the United States and the United Kingdom's withdrawal from the European Union (Brexit). Therefore, uneven and combined development is not unidimensional.

In applying the concept to our analysis, we must explain the method that can be derived from it. Analyses of social care systems should not be limited to institutional cross-sections that are frozen in time. Uneven and combined development concerns a structure that produces unintended results and unfolds over time. We can grasp the influences, reactions, and adaptations if we situate them in a temporal dimension, where they begin to act in dynamic (dialectical) processes. This is necessary because our aim is to achieve a complex unity of 'structural causality' (Althusser, 2015).

We proceed with the examination of the institutional arrangements for elderly care in four countries: Germany, Austria, Slovenia, and BiH. Our focus is on the specific arrangements and overall development dynamics.

3 National long-term care arrangements

3.1 Public support for demand: Germany and Austria

Germany introduced a welfare state in the 1880s to counter the growing popularity of the socialist movement (Hegelich and Meyer, 2009). The German and Austrian systems are considered to be conservative, based on the male breadwinner family model (Österle and Heitzmann, 2020, p. 23). While after the Second World War Germany developed an 'inclusive welfare state' (Bosch, 2015, p. 176), in the mid-1970s it turned away from the 'social market economy' (Hegelich and Meyer, 2009, p. 122). In the 1990s, it concentrated obsessively on reducing non-wage labor costs to below 40 per cent to boost the economy's competitiveness (Blank, 2020, p. 112). Further reforms introduced a multi-pillar pension system (2001), deregulated the labor market through the Hartz reforms (2002-2003), and raised the retirement age to 67 (2007).

The doctrine of New Public Management aims to reduce public spending and increase private funding. It has created a welfare market, including through the privatization of public institutions (Zuchandke et al., 2012, p. 215). In 1995, long-term care insurance was introduced in Germany (Hegelich and Meyer, 2009, p. 122). Everyone in need of care is entitled to it, regardless of their income (Zuchandke et al., 2012, p. 217). Beneficiaries can choose between home and institutional care, although the benefits vary depending on the type of care and do not cover all costs. This means that families must finance a considerable share of care costs (about 50 per cent for residential care), a figure which is increasing as benefits have not been adjusted for inflation. Private insurance companies have caused additional inequalities. Private insurers generate surpluses, whereas public insurers incur deficits since they insure individuals with lower incomes and greater health risks (88 per cent of the population) (Theobald and Hampel, 2013, p. 121).

Historically, the German welfare state has prioritized cash transfers, leaving the provision of social services to charitable organizations (Bosch, 2015, p. 181). Recent reforms abolished the privileges held by non-profit organizations and opened up the provision of services to for-profit companies (Theobald and Hampel, 2013, p. 127). This has encouraged private sector investment and even the emergence of multinational companies (KPMG AG Wirtschaftsprüfungsgesellschaft, 2021, p. 188). While non-profit (religious) organizations dominated before the reform, in 2019, 51 per cent of care recipients were in for-profit homes, 48 per cent in non-profit homes, and two per cent in public homes (KPMG AG Wirtschaftsprüfungsgesellschaft, 2021, p. 186). In general, families prefer home care (KPMG AG Wirtschaftsprüfungsgesellschaft, 2021, p. 184) due to the high co-payments for institutional care. If they cannot provide care themselves, they resort to the use of undeclared work by migrant women, especially from Eastern Europe, who provide 24-hour home care. An estimated 500,000 migrant workers are working in households, 90 per cent of them informally (Safuta et al., 2022, p. 311). Working conditions in institutional care are also difficult, resulting in an above-average employment rate of 18 per cent for migrants, compared to a national average of seven per cent (Theobald and Hampel, 2013, p. 130–131). Despite an enormous influx of migrant workers, the system has not alleviated the chronic labor shortage, with a reported shortage of 130,000 workers in the elderly care sector (KPMG AG Wirtschaftsprüfungsgesellschaft, 2021, p. 191).

As in Germany, Austria's welfare system developed in the 1880s, with social security also depending on employment status. By the 1990s, the range of social entitlements had expanded (Österle and Heitzmann, 2020, p. 21). Although social dialogue and the welfare state are still strong, 'welfare chauvinism' has curtailed the social rights of migrants.

In 1993, Austria was the first country to introduce a universal care allowance. Despite trade unions and employers' organizations being against it (Österle, 2013, p. 164), a 'cash-for-care' system was introduced. The state pays a care allowance that everyone is entitled to, regardless of income, if they need more than 60 hours of help per month. People in need of care can choose between care at home or in an institution. The majority remain at home (57 per cent in 2019), with far fewer opting for institutional care (Österle, 2013, p. 165). Public care homes continue to dominate institutional care (52 per cent).

The care allowance stimulates demand (Trukeschitz and Schneider, 2012, p. 194), like in Germany. Given that the care allowance only covers some of the costs, substantial co-payments are required, except for the poorest, who are entitled to social assistance. As the care allowance has not been adjusted for inflation, the co-payments for institutional care are growing. The system thus encourages the hiring of migrant women for 24-hour care in the home. Since the mid-1990s, and especially since 2000, households have engaged carers from Slovakia and Romania, as well as from the Czech Republic and Hungary, to provide 24-hour care in the home, with migrant women taking turns every two or four weeks. Private agencies often act as intermediaries (Aulenbacher et al., 2024). In 2006, there were an estimated 30,000 female informal carers (Österle, 2013, p. 167). One year later, the status of 'personal carer', who can be self-employed or employed, was legalized. While 27,000 female 24-hour carers were registered in 2011, by 2015 the number had already risen to 56,000 (Österle, 2013, 2018) because this is the cheapest option (Österle and Heitzmann, 2020; Trukeschitz and Schneider, 2012). As in Germany, the labor shortage has worsened, and it is expected that 75,700 new job vacancies will be created by 2030 (KPMG AG Wirtschaftsprüfungsgesellschaft, 2021, p. 44).

3.2 Public support for the supply: Slovenia

After it broke from Yugoslavia in the early 1990s, Slovenia's first reform was the centralization of social services, transferring them from the local 'self-managing communities of interest' to the state. At the same time, a 'dual model' was introduced, featuring a 'neo-corporatist' social dialogue and a welfare state (Bohle and Greskovits, 2012; Stanojević, 2015). Since the dual-earner model prevails, family reproduction is supported by an extensive public network of kindergartens, schools, and care homes (Filipovič Hrast and Rakar, 2020; Kolarič et al., 2009).

In the early 1990s, the trade unions succeeded in temporarily suspending the privatization of social services. At that time, there were 53 public care homes in Slovenia with more than 11,000 beds (Hlebec and Mali, 2013, p. 31). As early as 1992, the Social Security Act permitted private care homes, while in 1999, the Ministry of Labour began to actively promote the private provision of services through concessions. Between 2001 and 2015, this led to a rise in the number of private care homes from five to forty (Hlebec and Rakar, 2017, p. 39). In 2020, private homes had 5,476 beds, whereas public homes had 13,501 beds. Over thirty years, the number of beds has increased by 70 per cent, mainly due to private investment.

Private investments are largely financed by clients, who must bear more than half of the costs of care. Private care homes are considered to be part of the public network as they must obtain a concession and comply with standards and norms. The state also sets prices. However, weak regulations give them considerable freedom in manipulating prices for services that go beyond the standard, allowing them to charge the same costs multiple times (Court of Audit (Računsko sodišče), 2019, p. 103). The monthly cost of institutional care has been higher than the average pension since 2010 (source: SSZS), making the service less affordable.

The growth of the private sector had a wider impact on long-term care. As the state largely stopped investing in elderly care, public care homes had to raise their own funds for investments. Between 2008 and 2021, public institutions accounted for 61 per cent of investments, compared to ten per cent from the state and 29 per cent from the private sector (source: SSZS). The need to generate surpluses has inevitably influenced the behavior of public institutions, causing them to act like profit-oriented companies. The entry of private, profit-oriented actors into residential care has impacted the public sector itself, spreading the effects of commodification throughout the entire field.

Financial surpluses were primarily achieved through reductions in labor standards and care quality, which were borne by users and workers alike. The Court of Audit (Računsko sodišče) (2019, p. 53) found that staff are overworked. In social care, one person looks after an average of 50.6 users, with only 9.5 minutes allocated to each person. In healthcare, one person looks after an average of 11.4 users, with 40 minutes available for each. Long-term care institutions are becoming increasingly dependent on migrant workers as working conditions deteriorate. As of 2019, care homes were reporting a chronic labor shortage. The Ministry of Labour estimates that an additional 10,000 employees will be needed by 2030 (Ministry of the Interior (Ministrstvo za notranje zadeve), 2023, p. 14).

3.3 Minimum social security: Bosnia and Herzegovina

The Dayton Peace Agreement created a fragmented state administration in BiH, leading to 13 different social policies. Not only the political entities of the Federation of BiH, the Republic of Srpska, and the Brčko District, but also the ten cantons of the BiH Federation have their own social security system (Obradović and Hirose, 2022, p. 13). People thus have uneven access to social rights across different entities and cantons.

BiH spends less than 20 per cent of its GDP on social security, which is below the EU average but comparable to Eastern European EU Member States (Eurostat, ESSPROS).[2] Consequently, many older people depend on help from family members as services are unavailable

[2] But even this modest share is a cause for concern for the World Bank and other international institutions. They are calling on BiH to cut its social spending (OSCE Mission to Bosnia and Herzegovina, 2012). Although social spending in the Western Balkans is far below the EU average, Jusić and Obradović report that the EU is requesting 'cost containment' and 'better targeting' in the accession negotiations (Jusić & Obradović, 2019: 43).

or unaffordable, and few women are employed (around 30 per cent). The low employment rate of women is also a consequence of poor institutional support, ranging from meagre support for families to the poor network of kindergartens (fewer than 20 per cent of children are enrolled) (Obradović and Hirose, 2022; UN Women, 2023).

The modest supply of public care homes has been supplemented in recent years by private homes, capitalizing on the fact that many expatriates working abroad need institutional care for their parents. In the expanding private sector, up to 80 per cent of capacity is occupied by parents whose care is paid for by children living abroad (UN Women, 2023, p. 46). This factor has driven the price of care far above the purchasing power of the local population. While the average monthly pension is less than €400, monthly care in public homes costs between €410 and €460; it is 50 per cent more expensive in private homes, where a single room can cost up to €770 (Obradović and Hirose, 2022; UN Women, 2023). While the state covers all or part of the costs for poor people (28 per cent of care recipients), others must bear the full costs themselves (Obradović, 2021, p. 12).

BiH has had a low labor force participation rate and high unemployment, noting that the latter has fallen in recent years mostly due to emigration. Only one in three persons has a job, and just one in four has a formal job with social security (UN Women, 2023, p. 15). Due to the high unemployment rate, BiH concluded bilateral employment agreements with Slovenia, Qatar, and Germany. Economic hardship and political insecurity encouraged 5,000 nurses to emigrate to Germany and 50,000 drivers and construction workers to emigrate to Slovenia in the period 2013–2019 (Efendić, 2021, p. 21). Following the large-scale emigration, BiH experienced labor shortages in industry, hospitality, and healthcare (Obradović, 2021, p. 11).

We examined four development trajectories, including their mutual effects, incentives, responses, and unexpected outcomes. Germany and Austria can afford to support consumption with care allowances while leaving supply to the market. The result is that many care recipients opt for the cheapest home care and thus depend on low-wage migrant labor from Eastern and Southeastern Europe. In contrast, Slovenia supports the provision of long-term care. Having abandoned investment in the public sector, it now encourages private investment through guarantees and favorable pricing rules. The result is that public sector providers have also begun to behave like market players. This has worsened care and working conditions and made the sector increasingly dependent on migrant labor. Finally, BiH provides basic social security and is a country of emigration. The result is the emergence of private homes for parents whose children live abroad and can afford the exorbitant prices for care. This contributes to increasing inequality, which encourages further migration and the circulation of labor between countries.

So far, we have analyzed the development of long-term care systems in four countries, including the increasing intertwining of these systems through cross-border labor migration. In the following section, we will compare public spending on healthcare and social care in these countries.

4 Social economies compared

While comparing social spending between the European center and the (semi-)periphery, studies attempt to determine whether it is falling, stagnating, or rising (Böröcz, 2016; Katona and Melegh, 2020; Mause, 2020; Melegh, 2023). Although there is agreement that social spending in Western and Eastern European countries differs significantly, there is no consensus among researchers as to whether spending is falling, stagnating, or rising, and how these trends vary among countries in the center, semi-periphery, and periphery.

We tested these questions with our group of countries from Central and South-East Europe, to which we added Croatia and Serbia for further checking. The comparison was made using two indicators: World Bank data on government health expenditure and Eurostat data on social protection expenditure.

We commence by considering healthcare expenditure (Figure 1), which is at a much higher level and growing faster in Germany and Austria than in the semi-peripheral and peripheral countries. In addition, the periods of stagnation and decline are longer. Nevertheless, it cannot be denied that these countries have succeeded in narrowing the *relative gap* since 2000. For example, Slovenian healthcare expenditure in 2000 was 33 per cent of Austria's and had risen to 41 per cent by 2020. In the same period, Croatia's expenditure went up from 19 to 21 per cent, and that of BiH from three to ten per cent.

Yet, while the semi-peripheral and peripheral countries have managed to narrow the relative gap with richer countries, the absolute gap has clearly widened. In 2000, the difference between Austria's and Slovenia's expenditure was US$ 1,114; in 2020, it had grown to US$ 2,511. In the same period, the gap for Croatia widened from US$ 1,367 to US$ 3,369 and from US$ 1,629 to US$ 3,855 for Bosnia and Herzegovina. In short, while the countries of the semi-periphery and the periphery are narrowing the gap with the European center in relative terms, the absolute gap between them is growing. In Figure 1, the red arrows at the beginning and end of the data series display a kind of snowball effect.

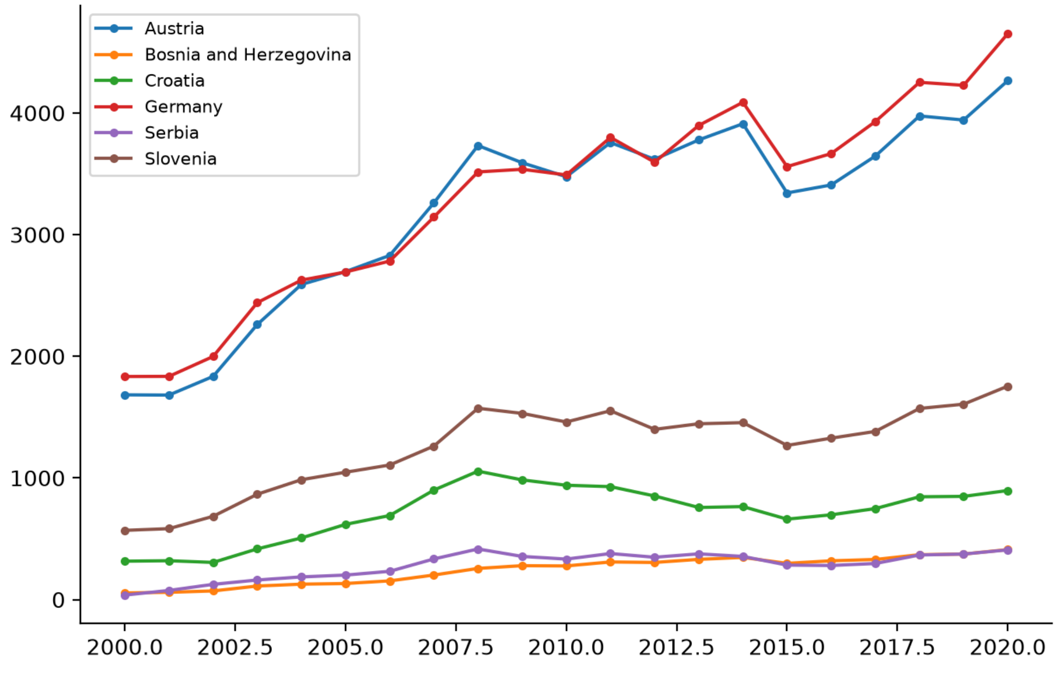

Figure 1 Domestic general government health expenditure per capita (current US$) (World Bank)

Source: World Bank, World Development Indicators, SH.XPD.GHED.PC.CD indicator.

Similar results are obtained when comparing Eurostat's social protection expenditure (Figure 2). Here too, expenditure is growing fastest in Austria and Germany, while the periods of stagnation are longer in the semi-periphery and the periphery. Moreover, the latter countries have reduced the relative gap between 2000 and 2021: compared to Austria, Slovenia has managed to reduce the expenditure gap from 35 to 42 per cent, but at the same time, the absolute gap increased from €4,827 to €8,709. The same applies to Croatia, Serbia, and BiH, for which only shorter data series are available. In 2021, Croatian expenditure was only 22 per cent of Austrian expenditure, which corresponds to a difference of €11,651. Serbian expenditure was 11 per cent, and the difference was €13,362. The two arrows again show a snowball effect.

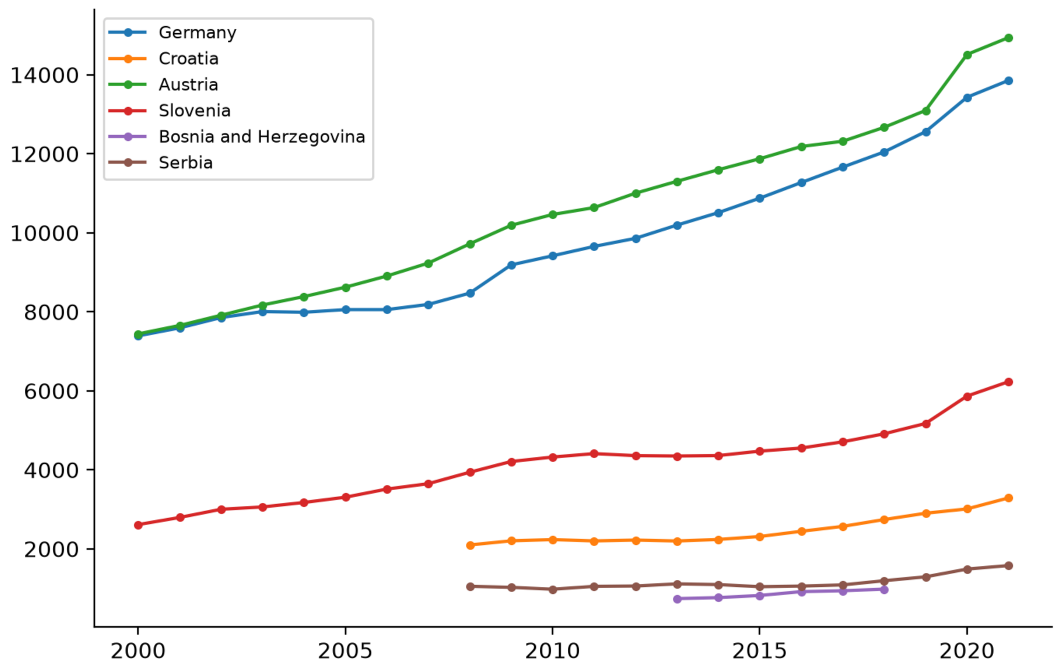

Figure 2 Total Expenditure on Social Protection per Capita (EUR) (Eurostat)

Source: Eurostat, ESSPROS, Total expenditure on social protection per head of population.

Note that when comparing social spending in constant prices, adjusted for inflation, the differences are smaller, yet the same trends are observable. There are many possible explanations for the 'snowball effect'. While greater economic growth provides an additional source of social spending and helps semi-peripheral and peripheral countries narrow the relative gap (Katona and Melegh, 2020, p. 13), these countries are reducing tax revenue and other contributions in order to compete with low-cost countries for foreign direct investment (Melegh, 2023, p. 183). This, coupled with the fact that these countries are net exporters of financial capital, profits, and property income extracted by foreign owners, contributes to the steady increase in the absolute differences between countries (Novokmet, 2017). These and other factors produce the results shown in Figures 1 and 2. They show that the proportions of social and healthcare spending vary across countries. Moreover, when combined, they reveal paradoxical temporal movements. While (semi-)peripheral countries are narrowing relative differences with more developed countries, they are falling further behind as absolute differences increase.

Having shown the uneven and combined development of long-term care in the selected countries, we return to our first research question in the concluding section: Have changes in national care systems triggered cross-border labor mobility?

5 Conclusion

Bringing the presented analyses together, we may conclude that the private sector plays a crucial role in the region’s ‘uneven and combined development of social care’. This adds weight to the conclusions of the scholars mentioned in the introduction (Daly and Lewis, 2000; Saraceno and Keck, 2011; Simonazzi, 2009), as well as the Eurofound study (2017), which states that the private, for-profit sector has experienced the greatest increase in the number of beds over the past decade. This is also an expected outcome of EU policy, which aims for cost-effectiveness and a reduction in public spending, ultimately strengthening the private sector. We thus ask what the expansion of the private for-profit sector means for care workers and care needs.

Germany and Austria have introduced a universal care allowance that requires considerable co-financing of care services by families. On the other hand, both countries (notably Germany) have largely outsourced the provision of services to the profit-driven welfare market. The result is that workers are being squeezed by both households and care homes. Workers are responding by fleeing institutional care, which is increasingly reliant on migrant labor. Still, the cash-for-care system has given rise to another segment of the private sector – around-the-clock co-resident migrant minders. If households cannot afford to buy services on the market, they must provide care for their elderly by themselves or hire carers in informal labor markets. This has led to a considerable expansion of the one-to-one personal care sector, which is the most inefficient way of organizing care, as it substantially increases the aggregate social cost of care and the demand for workers.

In BiH, private homes have capitalized on the market opportunity that children living abroad are willing to pay a lot to support parents who can no longer care for themselves. Demand from clients with high purchasing power is driving up the price of institutional care, making it less affordable for people working and living in BiH. This is further exacerbating disparities in access to care in the region. For instance, while users of institutional care pay 50 per cent of the cost of care in Germany and 60 per cent in Slovenia, most people in BiH must pay the full price. Weakening social security contributes to emigration, alongside poor working conditions, such as insecurity and fear of unemployment, ‘wage theft’ by employers who fail to pay overtime and/or social contributions, ‘envelope wage’ practices, a large informal sector, and the prevalence of fixed-term contracts among young employees. It is worth highlighting the following example, which illustrates the poverty trap in which the country is trapped. While many BiH citizens work abroad temporarily, they are still classified as unemployed in BiH. This classification grants them access to social security and healthcare, which the country provides to the most vulnerable temporary workers. The paradox is that BiH ends up subsidizing the demand for temporary migrant labor in wealthier countries. This example helps illustrate the snowball effects shown in Figures 1 and 2.

In this paper, we have shown that the demand for workers is not only propelled by the increasing need for care but also by institutional changes. The private sector, the driving force in the development of elderly care, has generated an inefficient and *wasteful social economy*. There are two central arguments for this. First, there has been a major increase in live-in home care, accounting for 64 per cent of demand in Germany and 57 per cent in Austria, which has created stronger demand for care workers. With a shortage of labor, providing one-to-one personal care is not an efficient way of organizing social services and entails a significant waste of labor. Second, the profit-driven nature of institutional care puts pressure on labor costs and worsens working conditions. This has led to the creation of low-end jobs that local workers tend to avoid, making the industry reliant on migrant workers. This system cannot survive unless it is embedded into the uneven and combined development of social care, with labor continually sourced from the (semi-)periphery. Wasteful social economies must therefore have a counterpart in countries such as Bosnia and Herzegovina, where deteriorating working and living conditions lead to emigration.

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BÉLA JANKY*

Bringing culture back: Towards a new social theory? – A review essay

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Abstract

The starting premise of the following review essay is that recent research in cultural evolutionary theory has laid the ground for a new paradigm in social theory. The aim of the paper is to briefly present the basic tenets of this new paradigm based on some recent monographs and other related publications. Followers of this new paradigm posit that cultural evolution has been dominated by biological adaptations and individual rational optimisation in shaping individual behaviour and social structure throughout human history. This review first briefly outlines what economic theory and evolutionary psychology, perhaps the two most influential theoretical paradigms of recent decades, have to say about human nature. Then it discusses recent empirical evidence related to the assumptions of these two paradigms, and offers an introduction to the basic tenets of the culture-based social theory currently under construction. The study also presents some specific conclusions from the new paradigm that could be relevant for the interpretation of contemporary social problems, and discusses a few points of concern related to agency, direction of evolution, and the role of rationality in cultural change.

Keywords: *social theory; cultural evolution; human evolutionary ecology; review essay*

1 Introduction

A well-attended book launch was held at the London School of Economics on 18 September 2023. Michael Muthukrishna, a young professor of economic psychology, presented his book *The Theory of Everyone* (Muthukrishna, 2023). Shortly before, in early September, the third Graeber Memorial Lecture was held, also at the London School of Economics. The topic was *The Dawn of Everything*, published in 2021 by the cultural anthropologist who died in 2020 (Graeber and Wengrow, 2021).

Perhaps the most important link between the two ambitious volumes is not the prestigious London university that the authors were affiliated with. Muthukrishna like Graeber and Wengrow, draws many of his important examples from the findings of cultural anthropological research. And, in contrast to the most influential social theories of recent decades, an important thesis of both volumes is that the characteristics of human societies cannot be directly deduced from the properties of human nature. And the authors of both books agree that this is mainly because human nature is crucially influenced by the particular culture in which individuals live.

Ambitious titles alone do not imply volumes of great significance. However, we know that Graeber is one of the most important cultural anthropologists of the twenty-first century. And, according to Google Scholar, *The Dawn of Everything* had already been cited in 1,500 scholarly works within a few years after its publication. In the case of *The Theory of Everyone*, there are as yet no signs that it will have a significant impact on social science discourse. However, Muthukrishna has published high-profile papers in leading journals in recent years. Several of them are co-authored with Joseph Henrich, who heads the Culture, Cognition, Coevolution Lab at Harvard University and is currently one of the most cited social scientists in the world (Henrich, 2024; Henrich and Muthukrishna, 2021; Muthukrishna and Henrich, 2019; Muthukrishna et al., 2021).

The starting premise of the following review essay is that the ambitious titles cited above are justified. The volumes relate to foundational research of a new line of inquiry that could lay the groundwork for a new paradigm in social theory. And the scientometric data show that this new line of research is having a significant and growing impact on contemporary social research. The aim of this paper is to briefly present the basic tenets of this new line of research based on some recent monographs and other related publications.[1] This essay does not provide a summary and general critique of any of those books. Insightful book reviews have already been published about all of them.[2]

The basic tenets of the new approach presented here are published in Henrich's *The Secret of Our Success* (Henrich, 2016). Muthukrishna's above-described book is both a popular introduction to the theses already put forward by Henrich and an attempt to embed the theory in a broader evolutionary framework. Henrich's and Muthukrishna's research can be subsumed under the growing disciplines of (evolutionary) cultural anthropology, cultural psychology, and human behavioural ecology. Currently, Henrich is considered the leading researcher in this emerging field. Besides Muthukrishna, perhaps the other most promising young researcher is Manvir Singh, a postdoctoral researcher at the University of Toulouse (Fitouchi and Singh, 2023; Singh, 2018, 2022,?).

Along with Michael Tomasello (2005, 2009), Cecilia Heyes, a professor of psychology at the University of Oxford, plays the most important role in establishing a new theoretical paradigm in cognitive science. She summarised her decades of research in her book *Cognitive Gadgets* a few years ago (Heyes, 2019).[3]

It falls outside the scope of a social science-focused review, but in the context of the psychological foundations, Feldman Barrett (2006), who developed the constructionist theory of emotions, should also be mentioned. She has also summarised her research in monographs in recent years (Feldman Barrett, 2017, 2020).

We will only briefly refer to Feldman Barrett's findings, as we will also only briefly refer to the research that laid the foundations for a general theory of cultural evolution (Boyd and Richerson, 1988; Cavalli–Sforza and Feldman, 1981), as well as to the recent book by Tomasello (2022) and a journal article coauthored by Robert Boyd and Pete Richerson (Richerson et al., 2024), members of the previous generation of students of cultural evolution.

The new approach has also proven fruitful in empirical studies. For example, many applied research studies have been conducted using the W.E.I.R.D. concept and the constructivist theory of emotions. These applications clearly demonstrate the significance of this new line of research, but I will not discuss them in this essay.

There is no direct link between the authors of *The Dawn of Everything* and the above-

[1] The Author's research was supported by the National Program for Sustainable Development and Technologies (FFT NP) of the Hungarian Academy of Sciences (subproject: "Economic and social aspects of sustainability", PI: Szalmáné Csete Mária).

[2] See e.g.: Appiah (2021), Clarke and Heyes (2017), Dickins (2024), Fagan and Durrani (2021), Heyes (2019), Kelly and Hoburg (2017), Roige and Carruthers (2019).

[3] Heyes is also concerned with the systematisation of the culturalist approach from the perspective of cognitive science (Heyes, 2023).

mentioned group of researchers. However, I consider Graeber and Wengrow's contribution to the construction of a new culture-focused social theory to be essential. At several points, they formulate alternative hypotheses to the claims of mainstream researchers of cultural evolution, highlighting problematic aspects of the current version of the theory under construction.

In the last fifteen years, a cultural theory-based approach to social research has (re)come to the fore within sociology as well (Lamont et al., 2017; Small et al., 2010). It is also centred at Harvard University, where the Culture and Social Analysis Workshop, affiliated with the Department of Sociology, provides the institutional framework for research in this area, and Michèle Lamont and Orlando Patterson are the leading researchers in the field (Lamont et al., 2014; Patterson, 2014). This review does not cover developments in cultural sociology, as current research in this field, which is very important in many respects, is less relevant to the specific modelling issues discussed here.[4]

This paper first briefly outlines what the two most influential theoretical paradigms of recent decades have to say about human nature. Then it discusses recent empirical evidence related to the assumptions underlying these two paradigms. This will be followed by an introduction to the basic tenets of the culture-based social theory currently under construction by Henrich and his fellow researchers. I will also present specific conclusions from the new approach that could be relevant to the interpretation of contemporary social problems. The review also discusses a few points of concern – mainly by comparing the positions of mainstream scholars with those of Graeber and Wengrow's alternative approach. The paper concludes with an open question which, in the author's view, poses a key challenge for a potential new theoretical paradigm in construction.

2 Modelling human nature to understand society: Two popular approaches

One of the classic questions in social theory is whether we can better understand social phenomena through concepts and laws that relate to the individual (vs. the social structure). By the end of the twentieth century, this debate seemed to have been settled. The paradigms that most influenced scientific thinking and public discourse placed individual choice at the centre of social research. The representatives of these theoretical frameworks believe that the way to understand social phenomena is through understanding individuals' decision-making processes (Arrow, 1994; Coleman, 1990; Elster, 1982; Udehn, 2002).

By the end of the century, the main cleavages between influential paradigms had developed around assumptions about human nature in general and rationality and instincts in particular. Namely, the mechanisms by which humans respond to environmental variables that affect their well-being became a key issue in theoretical debates.

One obvious adaptation mechanism is the natural selection for biologically inherited traits. The other basic mechanism is the optimisation of individuals' choices based on their life experiences (Muthukrishna, 2023). There is also a third mechanism that builds upon the life experiences of an individual's peers and ancestors. This latter is cultural adaptation. Assumptions about the weights of these basic mechanisms formed the basis of the *nature vs. nurture* debate in the twentieth century (Heyes, 2019). In the twentieth century, different disciplines tended to specialise in the study of one of those mechanisms. Here, we mention two disciplines that focus on the first two mechanisms, as they dominated the scholarly discourse on human behaviour in the last century.

[4] The author of this paper has previously devoted a separate review essay to the foundations of the new sociological theory of culture (Janky, 2016).

Economics. The fact that aggregate behavioural patterns of firms in modern markets respond quickly and well to key, well-measured incentives (Alchian, 1950) was a major contributor to the success of economics in the second half of the twentieth century. The well-quantified and well-measured associations observed in markets encouraged economists to develop sophisticated formal optimisation models. The application of mathematical models increased the prestige of economists, both within academia and among the wider public. Economic theory thus increasingly came to be seen as the basic science of human behaviour (Buchanan, 1969; Frey, 2013; Stigler, 1984). By the 1990s, economists had become perhaps the most important experts and pundits on a wide range of social issues (Szelényi, 2015). [5]

Evolutionary psychology. For many decades, so-called behavioural economics has sought to refine the model of individuals responding optimally to a rapidly changing environment (Kahneman and Tversky, 1979; Simon, 1972). However, the role of rational choice theory in influencing social and political discourse has been most challenged by the growing popularity of evolutionary psychology over the last three decades (Buss, 1995). Proponents of evolutionary psychology emphasise the dominant role of adaptation through natural selection (Barkow et al., 1992; Pinker, 1994, 2003; Tooby and Cosmides, 1990). As they put it, '*our modern skulls house a stone-age mind*' (Cosmides and Tooby, 1997). Behaviour that quickly produces an optimal response to certain stimuli in the environment is also the result of natural selection and presumably only applies to certain domains of life.

Certain theses of evolutionary psychology have become important reference points, particularly for conservative opinion leaders in the increasingly intense debates surrounding the gender issue (Somcutean, 2024). At the same time, the discourse of wellness, which influences individual consumption, has increasingly drawn on certain theses of evolutionary psychology. In particular, the distinction made in those theories between naturalness and civilisation.

At the same time, evolutionary psychology has not only challenged rational choice theory. These theses also offer a biological foundation for a model of intelligent, rational humans who can often respond optimally to the environment. For they assume that, in addition to many domain-specific instincts, humans also have a high level of improvisational intelligence. That is, we have very good on-the-fly problem-solving ability and can quickly put together causal models (Cosmides & Tooby, 1994). According to its critics, evolutionary psychology sees homo sapiens as an extremely clever chimpanzee (Henrich, 2016).

The classical model of culture. Culture was also recognised by the dominant paradigms described above. Evolutionary psychology assumes that human intelligence reached a level in the last 100,000 years that enabled it to build complex civilisations. Since then, culture has undoubtedly been important in human life. The classical model of culture, recognised by economists and evolutionary psychologists, is based on the analogy of genetic inheritance. Behavioural patterns are transmitted from individual to individual through vertical,[6] oblique,[7] and horizontal[8] transmission (Heyes, 2019).

The dominant view of economics and evolutionary psychology is that culture is 'good'

[5] A striking example is the Moving to Opportunity programme, a large-scale American social experiment on neighbourhood effects, where the testing of policy proposals based on ethnographic research in the 1970s and 1980s was ultimately left mainly to economists, who ignored the warnings of their sociologist colleagues when interpreting the data (Ludwig et al., 2013). Only later did they change how they measured and interpreted their tests to be consistent with the sociological theory of culture (Chetty et al., 2016; Clampet–Lundquist and Massey, 2008; Rothwell, 2015; Small and Feldman, 2011).

[6] From a member of the parental generation to a member of the children's generation.

[7] From one member of the parental generation to several members of the children's generation.

[8] Taking place between members of the same generation.

if it allows human nature to prevail. In this line, evolutionary psychologists argue that the main problems of civilisation are runaway processes. The physical and social environment has been changed too quickly in recent millennia, with no time for genetic adaptation. From this perspective, the tensions created by runaway processes can be seen as the price of the material wealth and physical security that modern civilisation has generated (Pinker, 2011). Economists tend to see the major problem of civilisation as the fact that collective choices are often less optimal than rational individual behaviour (Kavka, 1991).[9] Most mainstream economists typically envisage the path of civilisation's development as moving towards market institutions that ensure individual freedom of choice.

3 Culture and human nature: Some recent evidence

Theories in evolutionary psychology are based on three basic assumptions about human nature: improvisational intelligence, domain-specific instincts, and the general instinct to cooperate. In the last decade and a half, however, a number of research findings have emerged that are incongruent with these assumptions. Results on improvisational intelligence also concern the applicability of rational choice theory.

Intelligence. In the last two decades, a number of papers have been published that undermine the superintelligent chimpanzee model (Henrich, 2016). Biologists and psychologists have conducted several experiments comparing the intelligence of humans and primates. In these experiments, they used a design in which language and school knowledge could not be relied upon. This not only affected the tasks, but also the research subjects. Humans were typically children under school age (Tomasello, 2009). Nevertheless, these experiments aimed at investigating intellectual skills measured by human intelligence tests. In particular, they tested the understanding of spatial, causal, and quantitative relations.

Perhaps the most significant study is the Leipzig human-primate comparison experiment, which tested cca. 100-100 children and apes (Herrmann et al., 2010). In the intelligence tests, humans performed very similarly to chimpanzees and orangutans (among whom cubs perform as well as adults). Only in social learning did they perform better than the apes. Hence, it seems that human children do not have outstanding on-the-fly problem-solving abilities.

Along with a large body of research on the schooling effect, intelligence tests conducted among the Himba people bisected by the border river between Namibia and Angola show that the increase in intelligence during childhood and adolescence is primarily a cultural product (Muthukrishna, 2023, p. 110–111). In a natural experiment, some members of the tribe (who live on the Angolan side of the river) do not attend school at all. Among them, 18-year-olds have the same IQ as 6-year-olds living on either side of the border.

Specific instincts. Several results from cross-cultural psychology weaken the assumptions about domain-specific instincts. Recently, many human traits that were thought to be universal have been found to be primarily characteristic only of people living in modern Western societies (Henrich, 2020; Henrich et al., 2010). The term 'W.E.I.R.D.' (Western Educated Industrial Rich Democracies), which has now become a basic concept in academic and folk psychology, is a warning that the external validity of a large part of the findings on human nature in the twentieth century is fairly limited (Henrich, 2024).

[9] This is somewhat simplistic in this form. The thesis that collective wisdom transcends individual intelligence has also emerged in economic thought. For example, this is emphasised in the context of the power of price signals to organise the economy (Hayek, 1945). But importantly, this argument also points towards the free market, towards individual freedom. Namely, allowing autonomous individual choices to prevail.

These results, however, do not refute the general hypothesis of the existence of domain-specific instincts. They merely undermine specific, middle-level theories. A deeper and somewhat more general cognitive science critique, on the other hand, is provided by the constructivist theory of emotions (Cameron et al., 2015; Feldman Barrett, 2017). The theory assumes that individuals label the co-occurrence of certain situations and physical sensations in a culture- and life-experience-specific way. This culturally shaped label is the emotion that, in turn, helps one to react optimally to the stimuli. The same physical feeling can be interpreted either as '*I am excited*' or '*I am very scared*' – with contrasting behavioral consequences.

Feldman Barrett points out that the same facial expression can be associated with different emotions, and that it is very difficult to recognise individual emotions from facial expressions (Ekman and Keltner, 1970; Feldman Barrett, 2017). The results of experiments show a mixed picture, although over time they tend to weaken the universal emotion-expression thesis (Feldman Barrett et al., 2019; Reisenzein et al., 2013; Tcherkassof and Dupré, 2021). At the same time, cross-cultural research on the diversity of emotional concepts lends strong support for the constructivist theory of emotions (Dewaele, 2014; Jackson et al., 2019). Nonetheless, these results cannot refute the assumption that universal affects, with universal behavioural consequences, underlie culturally diverse emotions (Jackson et al., 2019).

Instincts for cooperation. The results of intercultural psychology on cooperation clearly weaken the third pillar of evolutionary psychology. Research on cooperation preferences was one of the most successful areas of behavioural economics in the 2000s. At the time, it seemed that some moral motivation would be an accepted part of the rational choice model. This further converged rational choice theory and evolutionary psychology (Thaler and Sunstein, 2009); for an early link, see Cosmides & Cosmides and Tooby (1994) and Hoffman and Smith (1998).

The most promising models have been based on the concept of fairness (Fehr and Schmidt, 1999). Fairness preference theories assume that people prefer a 50-50 distribution of goods and obligations. However, Henrich's research on the fairness preferences of South American Indians raised doubts about the universal applicability of the model even in the early years (Henrich, 2000). A later systematic study of 15 small-scale societies showed that the preference for 50-50 distribution tends to be more specific to modern Western societies. Members of small-scale societies tend to be more selfish and more accepting of others' selfishness in distributive situations than people living in modern Western countries (Henrich et al., 2001). Currently, after a good number of models and many empirical tests have been presented, we arrive back at the same point as at the end of the twentieth century: there is no empirically well-supported model of universal moral preferences (Cameron et al., 2015).

Cognitive science of human nature. Cultural evolutionary psychology, a new branch of cognitive science, digs deeper and challenges the theses of evolutionary psychology at the level of brain micro-mechanisms. Moreover, it offers alternative explanations for the evolution and function of the big brain. Cecilia Heyes, the leading researcher in the field, acknowledges that humans have both specific cognitive abilities and universal cognitive traits that could be considered part of human nature (Heyes, 2019). However, she argues that many of these are learned and passed on through culture. She also argues that brain growth has not been associated with the development of domain-specific abilities, but with an increase in general computational capacity (Cantlon and Piantadosi, 2024). Quantitative growth without genetic (but with culturally assisted) specialisation may have been an easier evolutionary path.

Her own main empirical research area is imitation, the copying of physical movements (Heyes, 2019, 2023, 1993). This is very much considered a basic human ability. However, recent findings, including carefully designed experiments with large sample sizes, show that while parents imitate their children's facial expressions intensively very early on, infants only start imitating their parents later (Heyes, 2019, p. 129).

Heyes hypothesises a general statistical estimating mechanism behind imitation that is also present in animals. This statistical estimation mechanism links the individual's own muscle movement to the image of the other individual (Heyes, 2019, p. 129-136). Human infants are ultimately able to imitate exceptionally well because, on the one hand, they are greatly aided by older humans and, on the other hand, they quickly figure out the statistical correlations necessary for imitation due to their brains' large computational capacity.

The most controversial hypothesis in cultural evolutionary psychology concerns the cultural origins of language skills (Heyes, 2019; Tomasello, 2005). This hypothesis is reinforced by research that has found a correlation between the technological complexity of cultures and their linguistic complexity (Henrich, 2016). However, there is unlikely to be conclusive empirical evidence for or against this hypothesis in the foreseeable future.

The relevance of the cognitive model offered by cultural evolutionary psychology is underlined by the heated debate in AI research between developers who advocate the importance of specific (programmed) machine skills and those who rely on general-purpose models and brute force (Sutton, 2019). According to one view, machines will be truly smart when they can not only see statistical relationships but also handle the domain-specific information behind raw data (Pearl and Mackenzie, 2018). This view is somehow analogous to what evolutionary psychology thinks about the importance of domain-specific cognitive skills.

At the same time, however, developers are achieving increasingly spectacular successes with general statistical estimation models by radically increasing computational power. The recent successes of generative artificial intelligence have led more and more people to believe that it is not programming-specific theoretical knowledge but increasing computational capacity that leads to more intelligent machines. As computer scientist Rich Sutton put it in his widely cited short pamphlet *The Bitter Lesson*: '*AI researchers have often tried to build knowledge into their agents...but...in the long run...breakthrough progress eventually arrives by an opposing approach based on scaling computation by search and learning*' (Sutton, 2019).[10]

4 A theory of the cultural species

The results described above suggest that culture plays a larger role in shaping human behaviour than most influential contemporary social science theories assume. Even if we accept this implication, the question remains: is there a coherent alternative model of behaviour based on culture on which to base a distinct new social theory?

In what follows, I summarise and interpret the views of a group of researchers who argue that there is such an alternative model, and one that is more consistent with our empirical knowledge of human behaviour and social dynamics than the current dominant theoretical paradigms.[11]

Dominance of cultural learning. To understand the rationale for this alternative theory, consider first the model described above of three mechanisms with which humans respond to environmental stimuli (individual learning, cultural learning, and biological adaptation). One can see that there may be environmental changes that are both too rapid for a given

[10] Sutton and most of his AI developer colleagues believe – in contrast to Heyes' cognitive model – that a development path based on expanding general-purpose computational capacity distances AI from human nature.

[11] For the antecedents of this line of research, which I will not discuss here, see e.g. Boyd and Richerson (1988), Cavalli–Sforza and Feldman (1981).

species to biologically adapt to and too complex to permit solving the adaptation problem on the fly.

Such environmental changes may open the way to cultural adaptation for organisms with certain cognitive abilities. In cultural evolution, it is neither biological changes nor the rational decisions of individuals that lead to adaptation. Instead, individuals learn from each other what a good response to a given challenge is.

Even animals with very simple brains learn from others. Animals with large brains learn much more and in more sophisticated ways from their peers (e.g., whales, elephants, primates). It is not only the proponents of cultural animal theory who think that humans are particularly effective social learners. However, supporters of this theory believe that the primary function of the big brain is to process cultural information.

Thus, the big brain does not directly lead to particularly good problem-solving abilities (see the primate-human comparisons cited above). Instead, it helps to store, structure, and recall information that facilitates the solution of difficult problems.

But there is more here: According to culturalist theory, humans have a special ability to solve problems that are completely opaque to them. This is what makes possible the cumulative culture that only human groups have. This is a culture where new generations can build on the improvements made by earlier generations. Other animals cannot do that. This ability is the key to the development of complex technologies. As Henrich (2016, p. 323) puts it, '*We stand on the shoulders of a very large pyramid of hobbits*'. But if one describes the model of evolutionary psychology as superintelligent chimps (Henrich, 2016), one should rather say that '*we are average chimps who stand on the shoulders of a very large pyramid of average chimps*'.

We do not know how long humans have been using technologies that are opaque to them. In any case, recent empirical research suggests that even today's foraging people do not understand technologies (e.g., weapon-making or food processing) that seem simple to us (Henrich, 2016, p. 99) – technologies that they use to great effect in their everyday lives and that are key to their survival.

Classical theories of culture imply that cultural learning is primarily limited to solutions, algorithms, and skills derived from genetically inherited basic skills. According to this view, logical, linguistic, and representational skills have been shaped by biological evolution. We learn specific mathematical, linguistic, and drawing rules throughout our lives based on these basic skills. Most adherents of the new cultural theory, on the other hand, believe that many basic skills may also have cultural origins. Their acquisition is facilitated by the biologically inherited ability for social learning (Henrich, 2016). There are even more radical views. Heyes (2019), for instance, hypothesises that we also learn basic learning mechanisms in the early years of our lives.

One can conclude that the large human brain, by building and using a cumulative culture, can respond to rapid and complex changes in the environment in the absence of *a)* appropriate bodily changes and instincts, and *b)* individual superintelligence. Indeed, the human brain grew significantly specifically during periods of high climate volatility (Muthukrishna, 2023; Richerson et al., 2024).

Note that when culture provides thinking tools, it also shapes on-the-fly problem-solving optimisation processes. Rational reasoning is a set of learned rules of logical thinking (Muthukrishna, 2023) that is subject to cultural evolution (Hong and Chen, 2024). Some sociologists have long argued that rational behaviour can also be the result of normative pressures (Lindenberg, 2008). This idea has also emerged in economics following the work of Rubinstein, although it is far from mainstream (Rubinstein, 2006, 2012).

The proponents of the new cultural theory do not deny that the pursuit of self-interest is part of the biologically inherited nature of human beings (Henrich, 2016, p. 109). But they dispute that the capacity for sophisticated rational optimisation is innate. Or rather, the separation of rationality and culture becomes meaningless when we *learn* to be rational.

Dominance of cultural evolution. Much more than the relationship between rational choice and culture, the new cultural theorists are concerned with the impact of culture on biological evolution. An important and classic thesis of the movement, which can be traced back to its founders, is that culture does not simply adapt to certain biological environmental constellations because it can exert strong selective pressures on biological traits (Boyd and Richerson, 1976) – in some cases, much stronger than most environmental factors.

This thesis of gene-culture coevolution is not easy to grasp, and the books reviewed here do not help by providing formal models or convincing informal arguments. However, there are a number of empirical findings that support the thesis. We know of several civilisation-linked, hyper-fast biological changes. These include rapid changes in skin and hair colour and certain features of the digestive tract, causing large intra-species variation (Henrich, 2016). The dual inheritance theory, which postulates parallel biological and cultural evolution, is a major pillar of the new cultural theory.

The fact that culture significantly influences both biological and on-the-fly optimisation could render the rational-versus-instinctive-behaviour controversy meaningless, potentially undermining the foundations of the two mutually reflective paradigms described above.

The question is, of course, whether culture complements or dominates the other two adaptation mechanisms in the case of humans. Henrich and colleagues argue that culture is the dominant adaptation mechanism, directly and indirectly. Two lines of related evidence are mentioned here.

First, theoretical models and laboratory experiments show that the efficiency of information acquisition increases with group size (Henrich, 2016, p. 224). The models also show that the efficiency of information transfer and retention is higher in distributed group information sharing than in peer-to-peer (vertical, oblique, or horizontal) information transfer assumed in classical culture models (Heyes, 2019, p. 204).

Second, a stronger, more direct argument for the dominance of culture emphasises the lack of adult humans' inborn skills for surviving in non-civilised environments. Henrich presents tragic cases from the *Lost Explorers' File* almost with relish (Henrich, 2016, p. 26). He recounts stories from this 'file' in which vital European explorers fail to survive in a natural environment rich in resources readily used for survival by locals. And the obligatory example used in all pop-science books, articles, and podcasts on the subject is the lack of a fire-starting instinct in humans. This seems particularly puzzling because our stomachs have adapted to processed food for a very long time. Without processed foods and therefore without fire, survival is very difficult for humans. And since we have learnt to use fire, many of our physical characteristics have changed (mostly due to cultural changes, according to cultural animal theory), but still, the biologically inherited ability to start fires has not evolved.

Human groups as superorganisms. Here we come to an important point. For if human survival is fundamentally dependent on culture, and culture exists in groups, then human evolution could be fundamentally dominated by selection between cultural patterns and the groups that carry them. If the cultural species hypothesis is true, then the agent of evolution is the cultural pattern that characterises the group.

Indeed, Henrich (2016) argues that human communities form so-called superorganisms (Maynard-Smith and Szathmary, 1995). A superorganism is a strong alliance of biological entities that has become so strongly interrelated that it forms a common entity with its own agency. And as Henrich puts it, just as cells make up the individual organism of a living being, so humans make up the agents of a cultural group (ibid., p. 318, Davison et al., 2021). Henrich sees this as a new type of species, which is why he speaks of a 'cultural species'.[12] According to Muthukrishna, the emergence of this new cultural species fits within the complexity-growth process described by Maynard-Smith and Szathmary (1995), which is a general tendency of evolution.

Then the question arises whether social processes can be understood directly through models of either rational or instinctive individuals. This reopens a debate about methodological individualism that was considered largely closed in the dominant social theoretical discourse by the end of the twentieth century.

5 Some implications of the theory

In the following, I would like to discuss two claims that might influence our view of important social problems, and that follow specifically from the cultural species model.

Fragility of civilisations. Some scholars in this line of research point out that human civilisation is very fragile (Heyes, 2019; Muthukrishna, 2023). Namely, after a shock that has somehow interrupted the transmission of culture, there is nothing to build on. This is because the technological knowledge that we have built our civilisation on over thousands of years is not in our genes.

Henrich gives several examples of civilisational regression from the records of cultural anthropological research. Civilisations can lose important technologies very quickly, resulting in a decline in their livelihoods and population. One example is an epidemic in the 1820s that wiped out most of the elders among the Polar Inuit (Henrich, 2016, p. 211) – the best bearers of technological knowledge in the absence of written information. The group thus lost important hunting and kayaking technologies from one year to the next. Their hunting area and group size were radically reduced in a very short time. If one accepts Heyes' theory that even learning is learned to a large extent, the prospect of some kind of disruption in the system of cultural transmission is particularly frightening.

The authors cited here do not discuss it, but it is plausible to conclude that the devaluation of the knowledge and skills related to the humanities in today's late-modern Western civilisation may also undermine technological development in the narrow sense, along with the social technologies that hold complex societies together. We do not know, of course, whether this is so, because we do not understand the contribution of each type of knowledge to the maintenance of our civilisation. But this not knowing means that we cannot rule out this possibility.

Group selection and individual welfare. Another important theoretical claim lacks systematic analysis in the books reviewed here. Namely, that the physical and mental well-being of the human individual is sometimes paradoxically influenced by selection between groups bearing cultural patterns. Situations in which cultural patterns that cause suffering to many people succeed cannot be excluded. The problem of such a paradoxical type of development was raised many decades ago in relation to the agricultural revolution (Sahlins, 1972).[13] Moreover, recent research has led to a more complex, less idealised view of small-scale societies themselves (Edgerton, 1992; Singh, 2022; Singh et al., 2017). Graeber and Wengrow (2021),

[12] The idea that the individual is not the agent of evolution in the case of humans is gradually gaining ground in biological theory (Andersson and Törnberg, 2019; Davison et al., 2021; Waring and Wood, 2021). We will return to this at the end of the paper.

[13] The thesis has recently been popularised by Harari (2015).

considering the internal opposition to the new cultural theory, place particular emphasis on the problem of individual well-being as separable from collective success.

What is clear is that the process of cultural evolution does not guarantee that human development will lead to greater individual happiness. As an extreme example, imagine a civilisation that becomes a strong military power that defeats other civilisations by (also) exploiting its own population.

As noted before, evolutionary psychologists also emphasise that civilisation can cause human suffering. But in their approach, this tends to be a psychological side-effect of material gain (due to, e.g., so-called runaway processes). The new cultural theory is less concerned with the mental conflict between human nature and civilisation because it assumes that our cultural brain is highly flexible. However, group selection may result in the very physical deprivation of many individuals living in evolutionarily successful cultural groups.

6 Some open questions

In this section, we discuss some of the important hypotheses of *The Dawn of Everything* that differ from the claims of cultural animal theory. Graeber and Wengrow do not belong to the close-knit network of authors discussed above. Rather, they belong to the mainstream of contemporary cultural anthropology. However, they draw very similar conclusions about the power of culture to the authors mentioned above. Furthermore, their alternative hypotheses are somehow related to the basic tenets of cultural animal theory and thus can be well understood within the framework of the new theory developed by Henrich and his colleagues. A critical comparison of some of the above claims with Graeber and Wengrow's alternative hypotheses could point to important challenges this field of research faces and show why this is not an integrated theory yet.

Agentic vs. blind forces of cultural evolution. Henrich and Muthukrishna do not believe that individual rationality is a key factor in making the decisions necessary for survival and flourishing. They transpose the concept of the *blind watchmaker* (Dawkins, 1986) to the field of cultural evolution. Henrich's illustrative example is the South American Indians' processing of cassava, which reduces the plant's cyanide content (Henrich, 2016, p. 97). This example is striking because the potential effects of cyanide in this context are significant only in the long term, and when adverse symptoms occur, the Indians would not be able to identify what substance had made someone sick, much less where it came from in the first place. In addition, the Indians have no idea that certain steps in their food processing procedures reduce the presence of certain substances in cassava. At least that's what Henrich claims.

Muthukrishna, instead, gives examples from the history of scientific and technical innovation in modern Western civilisation. As he puts it, the persons to whom we associate the milestones of the scientific-technical revolution were not in fact lone geniuses, but mostly lucky and diligent experimenters who were the first of many inventors trying at the same time to identify the processes that would ultimately prove best (Muthukrishna, 2023, p. 145).

These are important examples, but they do not exclude the possibility that in some situations rationality also plays an important role in optimisation. We may not be better *by nature* than primates at solving problems on the fly, but we are no worse either.[14] And primates are highly intelligent improvisational problem-solvers compared to most animals

[14]Actually, Henrich – based on the premise of the tendency for blind rule-following among humans, supported by the theory and some human-primate experiments – tends to accept that non-human primates have the highest inborn on-the-fly problem-solving intelligence.

(Tomasello, 2022). Moreover, as noted (and as Henrich and Muthukrishna also emphasise), in certain cultural contexts, we learn the tools of rational thinking.

In cumulative culture societies, of course, many problems are not comprehensible in their full complexity. But simpler sub-problems can be optimally solved with a culturally enhanced chimpanzee brain. And rational optimisation could also include rational (vs. blind) experimentation. Graeber and Wengrow argue strongly that humans are indeed capable of seeing through problems and solving them rationally (including solution by systematic experimentation). Notably, Boyd and Richerson, who laid the ground for cultural animal theory, also highlight the potential importance of agentic (vs. blind) forces in cultural evolution (Richerson et al., 2024).

Contrary to the individualist theories cited in the first half of this paper, and in line with the theory of the cultural animal, Graeber and Wengrow emphasise the power of group rationality. According to Henrich and Muthukrishna, however, group rationality is evolutionary rationality: the individual cannot understand why the solution that has evolved in the group is optimal. Graeber and Wengrow, in contrast, emphasise the power of collective wisdom, in which individuals can potentially understand the group's dilemmas through deliberate discourse (Richerson et al., 2024).

Henrich, Muthukrishna, Graeber, and Wengrow interpret public debates in pre-modern societies on technical and social issues through their own perspectives. *The Dawn of Everything* cites descriptions of deliberative, rational debates – primarily from observations by missionaries among North American Indians (Graeber & Wengrow, 2021, e.g., p. 39, 45, 473). Henrich, on the other hand, cites Polynesian anthropological observations that describe battles of esoteric arguments that are not relevant to the problem as far as we know in today's science, and argues that '*humans are terrible at designing institutions*' (Henrich, 2016, p. 174). He stresses that, in the end, it is usually bargaining power that determines what the community ultimately decides.

Nonetheless, Henrich assumes a kind of bounded rationality in the form of prestige bias. All kinds of habits of successful groups are readily adopted by communities in crisis (using all kinds of esoteric arguments as a rationale).

Effectiveness of cultural evolution. Henrich and Muthukrishna are, in fact, borrowing the concept of the *ever-clever* blind watchmaker from biological theory. This means that suboptimal solutions do not last long. Note that biological theory is also divided on the question of the optimality of natural selection. With reference to the mechanisms of evolution, some theoretical biologists argue that nature is full of easily accessible suboptimal solutions (Gould, 2010). Note also that the so-called Paris School of cultural evolutionary research also argues that it is not always the most optimal, but often the most easily learnable pattern that is spread in society (Buskell, 2017; Sperber, 1985, 1996).

Henrich and Muthukrishna also make more specific claims than the optimisation hypothesis. Namely, in the process of optimal adaptation to the environment, the dominant pattern of human societies, in the long run, inevitably moves towards increasing complexity. Perhaps the most emphatically stated thesis of *The Dawn of Everything* is a flat denial of this. The authors argue that both cultural attractors (which the book does not actually discuss) and local optimisation often work against growth in complexity. Where Graeber and Wengrow agree with Henrich is that complexity and group size are not deterministically related to the mode of production. Hunter-gatherer societies can also achieve relatively large sizes, and the dominance of agriculture does not necessarily lead to large, stratified societies.

Rational revolutions vs. incremental cultural evolution. Henrich and Muthukrishna draw most of their examples of cultural evolution from the narrowly defined field of technological innovation. Graeber and Wengrow, on the other hand, are much more interested in strategic issues: the choice of the mode of production and the social order.

This distinction is not in itself a theoretical conflict, but it is consistent with the mechanisms of cultural evolution that these authors consider important. When a process can be modified in small, low-impact increments, individuals and groups can experiment. And it can be assumed that small differences in efficiency across procedural modes will take many generations to have an effect through selective diffusion. In contrast, for high-impact discrete decisions, the returns to carefully developing and deliberately discussing hypotheses about the effects of alternatives are increased.

The reason why Graeber and Wengrow find different mechanisms of cultural evolution more important than Henrich is perhaps that they examine and select archaeological, historical, and anthropological evidence from different perspectives. Henrich and Muthukrishna examine the success of cultural animal groups. Graeber and Wengrow, on the other hand, are most interested in the well-being of individuals of the 'cultural animal'. They specifically look for examples of when individuals and groups have 'hacked' evolution for their own well-being. Somehow, those individuals shake off what many (but not Graeber and Wengrow!) see as developed (but the former feel oppressive) social arrangements. In contrast, Muthukrishna presents the assertion of nested interests within the group only as a harmful process (Singh et al., 2017).

7 Concluding remarks: Bringing nature, the individual, and the critical perspective back (again)

Theories organised around the concept of culture have always played an important role in the social sciences (Alexander, 2003; Lamont et al., 2014; Mead, 1928). However, earlier culture-focused theories typically distanced themselves from biologically based theories of human behaviour. At the same time, they recognised the independent validity and even fundamental nature of these biological theories.

In contrast, the new theoretical framework that places culture at the centre is embedded in the general science of living systems. The biological foundations of its theses sharply distinguish it from earlier cultural theories. Moreover, this new approach based on natural science does not assume that biological, psychological, and social aspects build on each other. In this theoretical framework, the evolutionary logic of living systems acts together on biology, psyche, and culture. And these factors are also interrelated. The concept of the cultural animal, for example, implies that culture can influence biological characteristics. Thus, a potential new paradigm based on the theories presented here could blur not only the boundaries between existing social science disciplines, but also the cleavages between the natural and social sciences.

At the same time, however, we cannot yet speak of a unified new theory (as suggested by the title of Muthukrishna's book), but rather of a cluster of interrelated theories.

One of the main questions in the general theory of living systems is the relationship between individual biological entities and collective entities (Maynard-Smith and Szathmary, 1995). This is also one of the ancient questions of the social sciences. An important open question in the new paradigm is the level of cultural selection.

The position of members of civilisations with a complex division of labour can indeed be modelled in part by analogy with the specialised cells of living organisms (Davison et al., 2021; Henrich, 2016). However, this analogy – as I see it – is far from perfect. Advanced cultures also impart advanced thinking and communication abilities to their individuals, who inherit the instinct for pursuing self-interest and high primate intelligence. They also have imaginative powers that allow them to consider untried alternatives. Graeber and Wengrow emphasise the power of imagination particularly strongly. In addition, human individuals are not physically locked into their functional position in the same way as the cells of other biological organisms (Davison et al., 2021, cf.). Many factors may determine the extent to which the cultural evolution of different patterns in a given context is determined by adaptive competition between societies (vs. subgroups or individuals within societies).

To the best of my knowledge, the study of the level of selection in the theory of cultural evolution is still in its early stages (Nichols et al., 2024). Yet models that address this would be needed to build a new social science paradigm on the promising foundations discussed here. And note that the examination of the relationship between the fitness of cultural communities and individual well-being is inherently normative in nature. It points to the potential conflict between evolutionary optimality and normative optimality. Thus, it paves the way for a critical analysis of social systems – as we clearly see in Graeber and Wengrow (2021).

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A comparative critical discourse analysis of president Vladimir Putin's inaugural addresses (2000-2024)

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Abstract

This article examines the rhetorical evolution of Vladimir Putin's inaugural addresses from 2000 to 2024 through a comparative matrix and critical discourse analysis. By analyzing five speeches across his presidential terms, the study identifies consistent rhetorical strategies (commonly emphasizing unity, national pride, and tentative optimism) alongside significant ideological shifts. While early speeches foreground democratic legitimacy, openness, and transition, later addresses increasingly sacralize national identity, invoke civilizational mission, and emphasize moral order. The role of the citizen transforms from co-responsible partner to ideological bearer of tradition and sacrifice. This rhetorical development reflects and reinforces broader shifts in Russia's political landscape, from transitional democracy toward a conservative, post-democratic model of authority. The study contributes to understanding how political discourse legitimizes power, reconfigures the public, and naturalizes ideological transformations. It offers a case study of how language functions as a tool of governance and symbolic control in contemporary authoritarian regimes, with implications for the study of political rhetoric and publicness in post-Soviet contexts.

Keywords: *Critical Discourse Analysis, Putin's inaugural addresses, Russian political discourse, media control, Russia.*

1 Introduction

Inaugural addresses are among the most significant discursive events in a political leader's career, and are consequently often examined by scholars (Chung and Park, 2010; Ericson, 1997; Kubát and Cech, 2016; Munday, 2018). They set the tone, clarify the agenda, and establish the rhetorical style for the forthcoming term. Often, they carry enormous symbolic weight, being more than just political statements, but testaments to the leader's vision for the future. This study employs Critical Discourse Analysis to delve into the five inaugural addresses of President Vladimir Putin, one of the most influential figures on the global political stage, who has served as the key figure of power in Russia for over two decades, defining Russia in the twenty-first century, prompting scholars to even talk about 'Putinism' (Applebaum, 2013; Fish, 2017; Kragh and Umland, 2023).

Vladimir Putin, serving as the President of the Russian Federation across multiple terms, has made a series of intriguing (and evolving) inaugural addresses. These speeches have been rife with various discursive strategies, reflecting Putin's political philosophy and the dynamics of power and ideology in Russia. By employing CDA, we aim to dissect these discursive strategies and shed light on the socio-political foundations of Putin's rhetoric. The choice of Putin's speeches as the subject of our analysis is not arbitrary. Putin's political career, marked by his ascendancy from the KGB to the Kremlin, has been a topic of intense global as well as academic interest (Dyson, 2001; Edele, 2017; Knight and Ruble, 2000; Mareeva et al., 2022; Weiser, 2018; Yudin, 2019). His speeches serve as a window into his political mind and the state of Russian society. Moreover, Putin's rhetorical style, characterized by its assertiveness, simplicity, and appeal to traditional values, provides a rich site for discourse analysis.

This study, we hope, has significant implications for our understanding of political discourse in Russia. By analyzing the discursive strategies in Putin's speeches, we can gain insights into the power dynamics, ideologies, and social practices in contemporary Russia, as well as how they have evolved over the course of a quarter of a century. Furthermore, our findings could contribute to the broader literature on political discourse, offering a unique case study of a prominent political leader's rhetoric.

2 Literature review – Ideological underpinnings of Putinism and elite discourse in Russia

The study of political discourse in Russia, particularly under Vladimir Putin's leadership, has garnered significant scholarly attention. We shall now proceed to review key contributions to understanding the ideological underpinnings of Putinism and elite discourse in contemporary Russia, with particular attention to recent scholarship that illuminates the discursive strategies employed in Putin's public communications.

2.1 Theoretical approaches to political discourse

Political discourse analysis has evolved significantly in recent decades, with scholars employing various theoretical frameworks to examine how language constructs and reflects power relations. Van Dijk's (2015, 2019) sociocognitive approach emphasizes the interplay between discourse, cognition, and society, providing a framework for understanding how political speeches both reflect and shape social attitudes and beliefs. Fairclough and Fairclough (2013)'s dialectical-relational approach examines how discourse is embedded in social practices, while Wodak (2001)'s discourse-historical approach considers the historical contexts that inform political communication.

These approaches have been productively applied to the study of political rhetoric in post-Soviet contexts, where discourse plays a crucial role in legitimizing new political arrangements and constructing national identities (Chung and Park, 2010; Kubát and Cech, 2016). As Munday (2018) notes, inaugural addresses are particularly significant discursive events that establish the rhetorical foundation for a leader's term in office.

2.2 Ideological foundations of Putinism

Recent scholarship has significantly advanced our understanding of the ideological underpinnings of Putin's regime. As Fomin argued, 'the role of ideology in the Kremlin's discourse was not the same in different periods of Russia's recent history. Moreover, it has varied even throughout the history of Putin's rule' (Fomin, 2025, p. 65). Fomin (2023, 2025) also provides a detailed analysis of how Putin's ideology is configured for different purposes, identifying what he terms 'two statisms' in Putin's rhetorical approach. According to Fomin, Putin's discourse strategically deploys different ideological configurations depending on whether the audience is domestic or international, and whether the context is one of stability or crisis. Particularly relevant to this study is Fomin's examination of how Putin combines references to 'rights and freedoms' with other ideological concepts, revealing the complex interplay between liberal democratic rhetoric and more authoritarian political practices (Fomin, 2023).

Laruelle's comprehensive analysis of Russia's ideological construction in the context of the Russo-Ukrainian War offers important insights into how the Putin regime has evolved from liberal conservatism to radical conservatism (Laruelle, 2024, p. 16-17). Her work demonstrates how the regime's ideology functions as a 'relatively consistent and coherent global view of its political project' (Laruelle, 2024, p. 7), challenging simplistic views that Putin's Russia lacks ideological foundations. Laruelle's multi-method approach to analyzing the 'ideological production process' provides a valuable framework for understanding how Putin's speeches contribute to broader ideological narratives that legitimize the regime's actions both domestically and internationally.

Engström (2014)'s research on Russian messianism and conservative intellectual milieus offers complementary insights into the cultural and religious dimensions of contemporary Russian political discourse. Her analysis of Russia's self-perception as a 'conservative orthodox superpower' and the concept of 'Katechon' (a restraining force against global chaos) illuminates how Putin's rhetoric draws on deep cultural and religious traditions to construct a distinctive Russian identity in opposition to Western liberalism. Engström's work on 'imperial aesthetics' and the 'neoconservative intellectual milieu' further provides context for understanding how Putin's speeches resonate with broader cultural currents in contemporary Russia (Engström, 2012).

2.3 Media control and public discourse

The relationship between political discourse and media control in Russia has been extensively documented. Gehlbach (2010) and Tolz et al. (2021) examined how state-controlled media shape public discourse, while Treisman (2011) analyzed how media management contributes to presidential popularity in Russia's 'hybrid regime'. These studies provide important context for understanding how Putin's speeches are disseminated and interpreted within Russia's media ecosystem. Stoner and McFaul (2015) trace the evolution of Russia's political system under Putin, documenting the gradual erosion of democratic institutions and the consolidation of authoritarian control. Their work, along with that of Edele (2017), provides background for understanding the changing political context in which Putin's inaugural addresses are delivered.

2.4 Discursive construction of Russian identity

The construction of Russian national identity through political discourse has been a central concern for scholars of contemporary Russia. Sullivan (2022) and Meyer (2007) examined how Putin's rhetoric invokes nostalgia for Soviet-era power and prestige, while Wood (2011) analyzed how Putin performs memory, particularly in relation to World War II commemorations. These studies highlight how Putin's speeches draw on historical narratives to construct a particular vision of Russian identity and destiny. Recent scholarship by Mareeva et al. (2022), as well as Yudin (2019), examines how Putin's discourse constructs and reinforces power relations within Russian society. These studies provide further insights into how inaugural addresses function both as ceremonial events and as strategic interventions that shape public perceptions and legitimize particular power arrangements.

3 Methodology – Van Dijk's sociocognitive approach to critical discourse analysis

This study employs Teun A. van Dijk's sociocognitive approach to Critical Discourse Analysis to examine President Vladimir Putin's inaugural addresses from 2000 to 2024. Van Dijk's model was selected for its systematic framework that connects textual features to broader sociopolitical contexts through cognitive mediation, making it particularly suitable for analyzing political discourse where power relations and ideological constructions are central concerns (Van Dijk, 2015).

3.1 Operationalization of the sociocognitive approach

The analysis operationalizes Van Dijk's model through a three-level analytical framework:

1. Micro-level (Semantic Analysis): Examination of lexical choices, semantic fields, and propositional structures in Putin's speeches. This includes identifying key themes, recurring metaphors, presuppositions, and implications that construct particular versions of reality. The semantic analysis focuses on how meaning is constructed through specific word choices and thematic patterns that reflect underlying ideological positions.

2. Meso-level (Pragmatic Analysis): Analysis of speech acts, rhetorical strategies, and discursive legitimation techniques. This level examines how language is used to perform specific social actions, including legitimizing authority, constructing national identity, and positioning Russia in relation to internal and external others. The pragmatic dimension addresses how meaning is activated in context to achieve specific political objectives.

3. Macro-level (Sociopolitical Context): Connecting textual features to broader sociopolitical contexts and mental models. This level examines how discourse both reflects and shapes social cognition, including shared beliefs, attitudes, and ideologies that underpin Putin's political project. The analysis considers how speeches function within Russia's evolving political landscape and how they contribute to the construction of power relations.

3.2 Integration of semantics and pragmatics

The integration of semantic and pragmatic analyses is central to this methodology. While semantic analysis reveals the content and structure of meaning in speeches, pragmatic analysis illuminates how these meanings function in their political and social contexts. This integration allows us to examine only what is said (semantic content) as well how it is said and what it accomplishes (pragmatic function). For example, when analyzing Putin's references to Russia's history, the semantic analysis identifies the historical narratives being constructed, while the pragmatic analysis examines how these narratives function to legitimize contemporary political actions or construct particular versions of Russian identity. This integration provides a more comprehensive understanding of how discourse operates as both representation and action.

3.3 Data collection and analysis procedure

The corpus consists of five inaugural addresses delivered by Vladimir Putin (2000, 2004, 2012, 2018, and 2024). Each speech was analyzed through the following procedure:

1. Preliminary reading to identify major themes and discursive features,
2. Systematic coding of semantic elements (lexical choices, metaphors, presuppositions),
3. Identification of pragmatic strategies (legitimation techniques, appeals to authority, construction of in-groups and out-groups),
4. Contextual analysis connecting textual features to the sociopolitical environment of each period, and
5. Comparative analysis tracking discursive shifts across the five speeches.

This methodological approach enables a systematic examination of how Putin's inaugural addresses have evolved over time, reflecting and contributing to changes in Russia's political landscape. By focusing on the interaction between semantic content, pragmatic function, and sociopolitical context, the analysis reveals how these speeches serve as instruments of power, constructing particular versions of reality that advance specific political projects.

4 Findings

4.1 First inaugural speech (2000)

Vladimir Putin's ascension to the Russian presidency marked a significant moment in the nation's political landscape. His first inauguration, taking place on May 7, 2000, symbolized the transition of power from the Yeltsin era and the initiation of a new chapter in Russia's post-Soviet narrative. The ceremony was methodically orchestrated, reflecting the meticulous care with which Putin has since governed the nation. For the first time in Russian history, the inauguration was held in the Grand Kremlin Palace, a location imbued with historical significance and national pride, a decision that signalled Putin's intentions to connect with Russia's illustrious past. The ceremony lasted precisely one hour, reflecting a level of precision that has characterized Putin's time in office, said by scholars to have been 'creating an image that aligns him personally with the fate of the country' (Wood, 2011, p. 173).

Despite having resigned on the last day of 1999, Boris Yeltsin, the first President of Russia, was formally invited as a guest and took part in the ceremony as the outgoing president. This symbolic act of continuity reinforced the legitimacy of Putin's ascension, while simultaneously underlining the significant change that his presidency represented. The inauguration ceremony began with soldiers of the Kremlin Regiment carrying the Flag of Russia, the Flag of the President of Russia, a special copy of the Russian Constitution, and the Sign of the President of Russia through St. George and Alexander Halls. This procession symbolized the sovereign power of the presidency and served as a reminder of the institutional continuity and constitutional mandate that Putin was inheriting. As the Kremlin chimes struck, Putin, accompanied by the Chairmen of the Constitutional Court, the Federation Council, the State Duma, and the Central Election Commission, made his entrance into the Grand Kremlin Palace. This entrance marked the formal start of Putin's presidency and was a testament to the institutional structures that underpinned his authority. The discursive features observed in Putin's first inaugural address are presented in Table 1:

Table 1 Discursive Features of Putin's First Inaugural Address (2000)

Discursive Feature	Description	Example from Speech
National Unity	Emphasis on collective identity and shared purpose	'Together we have achieved a lot, and we have achieved it through our only own efforts.'
Patriotism	Appeals to love of country and national pride	'We all are the inheritors of Russia and its thousand years of history.'
Democratic Transition	Positioning Russia as moving toward democratic governance	'We need a broad base for developing democracy in our country.'
Historical Continuity	Connecting present actions to Russia's historical legacy	'They have passed down to us this huge, great state.'
Future Vision	Articulating aspirations for Russia's development	'The main objective of the coming four years is now to transform the potential we have built up into a new development energy.'

The speech constructs narratives of national unity, patriotism, democratic transition, historical continuity, and a vision for the future. It highlights the ideological implications and power dynamics embedded in the text, shaping public opinion and reinforcing the president's authority.

4.2 Second inaugural speech (2004)

The second inauguration of Vladimir Putin as President of Russia, which transpired on May 7, 2004, closely followed the procedural patterns of his first inauguration. The ceremony was conducted with a similar sense of formality and decorum, albeit with a few notable differences. The commencement of Putin's second presidential term was marked at noon, with Putin making a grand entrance through a suite of three rooms – St. George's Hall, Alexander Hall, and Andrew Hall – in the Grand Kremlin Palace. This ceremonial procession, heavy with historical symbolism, set the tone for Putin's second term, emphasizing continuity and stability.

The ceremony was attended by a diverse array of dignitaries, including representatives from the Russian Orthodox Church, members of the diplomatic corps, and high-ranking officials from various branches of the Russian government. The presence of these figures underscored the broad-based support for Putin's presidency and the institutional legitimacy of his rule. The ceremony itself was a carefully choreographed affair, with each element designed to reinforce the solemnity and significance of the occasion. The oath of office, administered by the Chairman of the Constitutional Court, was a pivotal moment, symbolizing Putin's commitment to upholding the Russian Constitution and serving the Russian people.

Following the oath, Putin delivered his inaugural address, a speech that was both reflective of his first term and forward-looking towards his second. The address was characterized by a tone of confidence and determination, reflecting Putin's growing assurance in his role as Russia's leader. The speech was also notable for its emphasis on Russia's unique path and its distinct identity, themes that would become increasingly prominent in Putin's rhetoric over the years. The discursive features of Putin's second inaugural address are presented in Table 2 below:

Table 2 Discursive Features of Putin's Second Inaugural Address (2004)

Discursive Feature	Description	Example from Speech
Accomplishment Narrative	Highlighting achievements of first term	'We have achieved high economic growth rates, we who overcame difficult ideological confrontation.'
Continuity	Emphasizing ongoing commitment to previous goals	'As before, I consider that the help and backing of the citizens of Russia constitute the primary and most reliable support for the President's work.'
Collective Agency	Attributing success to collective Russian effort	'It was we who stood firm against the attacks of international terrorism and saved the country from the very real threat of collapse.'
Future Orientation	Focus on upcoming challenges and opportunities	'We still have much, very much, to do – for our country, for ourselves and for our children.'
Institutional Legitimacy	Reinforcing constitutional and institutional foundations	'The President's obligations to look after the state and faithfully serve the people will henceforward be sacred for me and will be above all else as before.'

4.3 Third inaugural speech (2012)

Vladimir Putin's third inauguration as President of the Russian Federation took place on May 7, 2012, following a four-year period during which he served as Prime Minister under President Dmitry Medvedev. This ceremony marked Putin's return to the presidency and the beginning of a new phase in Russian politics. The inauguration was held in the Grand Kremlin Palace. The choice of venue, with its opulent surroundings and historical resonance, yet again served to underscore the continuity of Putin's leadership and the stability he represented.

The ceremony began with the traditional procession through the Kremlin's historic halls, with Putin making his way to the Andreyevsky Hall, where the oath of office was to be administered. The procession was accompanied by the Presidential Regiment, a unit with a storied history dating back to the Soviet era. The presence of the regiment, with its disciplined formations and ceremonial uniforms, added a military dimension to the proceedings, symbolizing the strength and order that Putin's leadership promised to bring to Russia.

The oath of office was administered by the Chairman of the Constitutional Court, a ritual that emphasized the constitutional basis of Putin's authority. Following the oath, Putin delivered his inaugural address, a speech that was emphasized Russia's sovereignty, its unique historical path, and the challenges it faced in a rapidly changing world. The address was characterized by a more assertive tone than his previous inaugural speeches, reflecting Putin's growing confidence and the changing geopolitical context in which Russia found itself. The discursive features of Putin's third inaugural address are presented in Table 3:

Table 3 Discursive Features of Putin's Third Inaugural Address (2012)

Discursive Feature	Description	Example from Speech
Sovereignty	Emphasis on Russia's independence and self-determination	'We want to live in a democratic country... where sovereignty is guaranteed and human dignity observed.'
Historical Destiny	Framing Russia's path as historically determined	'We have passed through many trials together and have always been victorious... because we are together.'
National Unity	Calls for unity in face of challenges	'We are one people... we have one common future.'
Responsibility	Emphasis on duty to country and future generations	'I consider it to be the meaning of my whole life and my obligation to serve my fatherland and our people.'
Civilizational Identity	Positioning Russia as a unique civilization	'Russia's centuries-long history and the experience of our ancestors prompt us to meet these challenges together.'

4.4 Fourth inaugural speech (2018)

Putin's fourth inauguration as President of the Russian Federation took place on May 7, 2018, following his re-election in March of that year. The ceremony, held in the Grand Kremlin Palace (again), was a grand affair, reflecting Putin's status as Russia's long-serving leader. The inauguration began with the traditional procession through the Kremlin's historic halls, with Putin making his way to the Andreyevsky Hall for the oath of office. The procession was accompanied by the Presidential Regiment, whose presence added a military dimension to the ceremony, symbolizing the strength and order of Putin's Russia.

The oath of office was administered by the Chairman of the Constitutional Court, yet again stressing the constitutional basis of Putin's authority. Following the oath, Putin delivered his inaugural address, a speech that was characterized by its emphasis on Russia's future development, its place in the world, and the challenges it faced. The address was notable for its focus on domestic issues, particularly economic development and social welfare, reflecting Putin's awareness of the growing concerns among the Russian populace about economic inequality and social justice. The discursive features of Putin's fourth inaugural address are presented in Table 4:

Table 4 Discursive Features of Putin's Fourth Inaugural Address (2018)

Discursive Feature	Description	Example from Speech
Modernization	Focus on technological and economic development	'A new quality of life, wellbeing, security, and health for the people… this is what constitutes the main focus of our policies.'
Patriotic Duty	Framing service to Russia as moral obligation	'I believe that it is my duty and the meaning of my whole life to do everything for Russia, for its present and future.'
Global Position	Asserting Russia's role on world stage	'Russia is a strong, active, influential participant in international life.'
Continuity and Change	Balancing tradition with progress	'We need breakthroughs in all areas of life… drawing strength from our great history.'
Citizen Welfare	Emphasis on improving living standards	'The wellbeing of our citizens and the security of our Motherland are inextricably linked.'

4.5 Fifth inaugural speech (2024)

Putin's fifth inauguration as President of the Russian Federation took place on May 7, 2024, following his re-election in March of that year. The ceremony, held in the Grand Kremlin Palace, maintained the traditional format established in previous inaugurations, while also reflecting the evolving political context in Russia and internationally. The inauguration began with the customary procession through the Kremlin's historic halls, with Putin making his way to the Andreyevsky Hall for the oath of office, accompanied by the Presidential Regiment.

The oath of office was once again administered by the Chairman of the Constitutional Court, still maintaining the constitutional formality that has characterized all of Putin's inaugurations. Following the oath, Putin delivered his inaugural address, which emphasized Russia's sovereignty, its historical mission, and its position in a changing global order. The speech reflected the geopolitical tensions that have defined Putin's recent years in office, particularly following Russia's military actions in Ukraine and the resulting international sanctions.

The address was characterized by a more defiant tone than previous speeches, with Putin emphasizing Russia's resilience in the face of external pressures and its determination to chart its own course. There was a strong stress on national unity and patriotism, with Putin calling on Russians to stand together in defense of their country's interests and values. The speech also contained references to Russia's historical experiences, particularly its victory in World War II, which Putin used to frame contemporary challenges as part of a continuing struggle for national survival and dignity. The discursive features of Putin's fifth inaugural address are presented in Table 5:

Table 5 Discursive features of Putin's fifth inaugural address (2024)

Discursive Feature	Description	Example from Speech
Defiance	Resistance to external pressure and criticism	'The President's obligations to look after the state and faithfully serve the people will henceforward be sacred for me and will be above all else as before.'
Historical Resilience	Framing current challenges through historical lens	'The people of Russia demonstrated their best qualities as patriots and citizens during these critical moments.'
Sovereignty	Emphasis on Russia's independence and self-determination	'Together we have made our Motherland a country that is open to the world, a country that seeks broad and equal cooperation, a country that has strengthened its positions on the international stage.'
Traditional Values	Defense of Russian cultural and moral traditions	'We all are the inheritors of Russia and its thousand years of history, the inheritors of this land that has given birth to exceptional sons and daughters, workers, warriors, and creators.'

In this fifth inaugural address, Putin continues to emphasize themes of national unity and patriotism, but with a now more pronounced focus on Russia's sovereignty and resistance to external pressures. The speech reflects the increasingly tense international environment in which Russia operates, with Putin positioning himself as the defender of Russian interests and values against foreign interference. The address also reveals a deepening of the conservative, nationalist rhetoric that has characterized Putin's later terms, with greater emphasis on traditional values and Russia's distinct civilizational identity.

Having identified key discursive features in all five speeches, we can proceed towards a comparative analysis.

5 Comparative analysis – evolution of Putin's discursive strategies (2000-2024)

A comparative analysis of Vladimir Putin's five inaugural addresses reveals both continuities and significant shifts in his discursive strategies over the past two decades. Herein, we examine the evolution of key themes and rhetorical approaches across these speeches, highlighting how they reflect and reinforce broader changes in Russia's political landscape.

5.1 Shifting conceptions of democracy and governance

Putin's conception of democracy and governance has undergone a transformation across his inaugural addresses. In his first speech (2000), Putin emphasized the importance of developing democracy and strengthening civil society, stating: 'We need a broad base for developing democracy in our country and for continuing the transformations we have begun.' This rhetoric positioned Russia as a transitional democracy moving toward greater openness and pluralism.

By his third and fourth speeches (2012, 2018), however, the conception of democracy had shifted significantly. Democracy became increasingly framed in terms of national sovereignty and Russia's unique historical path, rather than in terms of liberal democratic institutions or practices. As Fomin (2023) notes, Putin strategically combines references to 'rights and freedoms' with nationalist and statist concepts, creating a hybrid discourse that maintains democratic terminology while emptying it of liberal content.

In his fifth speech (2024), the emphasis on Russia's sovereign path is even more pronounced, with democracy now firmly subordinated to notions of national unity and traditional values. This evolution aligns with Laruelle's (2024) observation that the Putin regime has moved from 'liberal conservatism to radical conservatism', with an increasingly assertive rejection of Western liberal democratic models.

5.2 The evolving role of the citizen

The construction of citizenship and the relationship between the state and the individual have also evolved significantly across Putin's inaugural addresses. In his early speeches, citizens are portrayed as active participants in Russia's development, with Putin stating in 2000: 'Only free people in a free country can be genuinely successful.' This framing suggests a partnership between state and society, with citizens having agency and responsibility in shaping Russia's future.

In later speeches, particularly from 2012 onward, the citizen is increasingly constructed as a bearer of national tradition and values, with individual freedoms subordinated to collective national interests. By 2018, Putin's rhetoric emphasizes patriotic duty and sacrifice for the motherland: 'I believe that it is my duty and the meaning of my whole life to do everything for Russia, for its present and future.'

The 2024 speech further consolidates this shift, with citizenship now firmly tied to patriotism and loyalty to the state. This evolution reflects what Engström (2014) describes as Russia's self-perception as a 'conservative orthodox superpower', where individual identity is subordinated to a collective national mission.

5.3 From openness to civilizational distinctiveness

Perhaps the most striking evolution in Putin's inaugural rhetoric is the shift from emphasizing Russia's openness to the world to asserting its civilizational distinctiveness. In 2000, Putin described Russia as 'a country that is open to the world, a country that seeks broad and equal cooperation'. This framing positioned Russia as seeking integration with the global community and international norms.

By 2012, however, this rhetoric had shifted toward emphasizing Russia's unique historical path and civilizational identity. Putin increasingly framed Russia as a distinct civilization with its own values and traditions, rather than as a country converging with global (particularly Western) norms and practices.

The 2024 speech represents the culmination of this trend, with Putin explicitly positioning Russia as a defender of traditional values against external forces. This evolution aligns with what Laruelle (2024) identifies as the regime's increasingly coherent ideological project, which positions Russia as a civilizational alternative to Western liberalism.

5.4 Rhetorical strategies and legitimation techniques

The rhetorical strategies and legitimation techniques employed in Putin's inaugural addresses have also evolved over time. Early speeches relied heavily on pragmatic legitimation, emphasizing economic growth, stability, and improved living standards as the basis for Putin's authority. As Wood (2011) notes, Putin initially constructed his image as a technocratic manager who could deliver practical results for the Russian people.

Later speeches, particularly from 2012 onward, increasingly employ moral and historical legitimation, appealing to traditional values, Russia's historical mission, and its unique civilizational identity. By 2018 and 2024, Putin's rhetoric draws heavily on what Engström identifies as 'imperial aesthetics', with frequent references to Russia's imperial and Soviet past as sources of national pride and legitimacy.

This shift in legitimation strategies reflects the regime's adaptation to changing circumstances, particularly the economic challenges that have made pragmatic legitimation less effective. Putin's 'two statisms' (Fomin, 2025) allow for flexible ideological configurations depending on the context, wherein there is 'patriotic statism, which places the state as the ultimate value that requires citizens to make sacrifices for it, and welfare statism, which imagines the state as a provider of people's well-being' (Fomin, 2025, p. 65).

5.5 Conclusion of comparative analysis

The comparative analysis of Putin's five inaugural addresses reveals a clear trajectory in his discursive strategies. From initially positioning Russia as a transitional democracy seeking integration with global norms, Putin's rhetoric has evolved to construct Russia as a distinct civilization with its own values and historical mission. This evolution reflects and reinforces broader shifts in Russia's political landscape, from the relative openness of the early 2000s to the increasingly authoritarian and nationalist orientation of recent years. As Laruelle (2024) argues, this shift represents the development of a coherent ideological project that positions Russia as a conservative alternative to Western liberalism. Putin's inaugural addresses have played a crucial role in articulating and legitimizing this project, using discursive strategies to naturalize ideological transformations and reconfigure the relationship between state and society in Russia.

6 Conclusion

This critical discourse analysis of Vladimir Putin's five inaugural addresses (2000-2024) reveals an evolution in his rhetorical strategies and ideological positioning over more than two decades in power. The study demonstrates how Putin's discourse has shifted from emphasizing democratic transition and openness to the world toward increasingly asserting Russia's civilizational distinctiveness and traditional values. This rhetorical transformation both reflects and reinforces broader changes in Russia's political landscape, from the relative pluralism of the early 2000s to the more authoritarian and nationalist orientation of recent years.

The analysis confirms Fomin's (2023, 2025) observation that Putin's ideology is strategically configured for different purposes, with welfare statism and patriotic statism deployed flexibly depending on the context. In periods of stability, Putin's rhetoric emphasizes pragmatic concerns such as economic development and improved living standards. During crises or periods of international tension, his discourse shifts toward patriotic statism, emphasizing national unity, historical resilience, and resistance to external pressure.

Similarly, the study supports Laruelle (2024)'s argument that the Putin regime has evolved from 'liberal conservatism to radical conservatism', with an increasingly coherent ideological project that positions Russia as a conservative alternative to Western liberalism. This evolution is evident in the shifting conceptions of democracy, citizenship, and Russia's place in the world across Putin's inaugural addresses. What began as a relatively conventional post-Soviet transition narrative has developed into a distinctive ideological vision that combines elements of imperial nostalgia, Orthodox traditionalism, and anti-Western sentiment.

The analysis also confirms Engström (2014)'s insights regarding the cultural and religious dimensions of contemporary Russian political discourse. Putin's later speeches increasingly draw on notions of Russia as a 'conservative orthodox superpower' and employ what Engström terms 'imperial aesthetics' to construct a distinctive Russian identity in opposition to Western liberalism. This cultural framing serves to legitimize Putin's authority and policies by positioning them within a broader civilizational narrative.

From a methodological perspective, the study demonstrates the value of Van Dijk's sociocognitive approach to critical discourse analysis for examining political rhetoric. By integrating semantic and pragmatic analyses with attention to the broader sociopolitical context, the study reveals how Putin's speeches function as instruments of power, constructing particular versions of reality that advance specific political projects. The three-level analytical framework (micro, meso, and macro) provides a comprehensive understanding of how discourse operates as both representation and action in the political sphere.

The findings have significant implications for understanding political discourse in contemporary Russia and authoritarian regimes more broadly. Putin's inaugural addresses reveal how language functions as a tool of governance and symbolic control, legitimizing power, reconfiguring the public, and naturalizing ideological transformations. The study highlights the importance of attending to the discursive dimensions of political power, particularly in contexts where formal democratic institutions may mask more authoritarian realities.

A potentially important avenue for further research concerns the interaction between Western political discourse and the evolution of Putin's own rhetorical positioning. As demonstrated in the analysis, Putin's early presidential discourse was neither overtly ultranationalist nor explicitly anti-Western; rather, it was largely technocratic and, at least rhetorically, open to cooperation with the international community. Over time, however, this discourse shifted toward a more pronounced emphasis on sovereignty, civilizational distinctiveness, and resistance to external pressure.

This transformation coincided with increasingly antagonistic representations of Putin in Western political discourse, where he was frequently framed in highly moralized and historically charged terms. For instance, David Cameron compared him to Hitler (Traynor and MacAskill, 2014), while Boris Johnson made a similar comparison in 2018 (Withnall, 2018). Comparable analogies and characterizations have also been employed by figures such as Hillary Clinton, Marco Rubio, Zbigniew Brzezinski, John Baird, Stephen Harper, Jonathan Eyal, and John McCain (Blake, 2014). While the present study does not establish a direct causal relationship, such external discursive constructions may have contributed to a process of mutual reinforcement, in which Western "othering" of Russia and Putin's own civilizational rhetoric became progressively aligned. From a sociocognitive perspective, such dynamics can be understood as interacting discourses that shape political identities and legitimation strategies across contexts.

Rather than suggesting that Western actors "created" the ideological trajectory observed, a more precise interpretation is that external antagonistic framing may have functioned as one of several reinforcing conditions under which Putin's rhetoric shifted toward a more explicitly conservative and anti-Western orientation. A systematic analysis of this potential feedback loop between internal and external political discourse would represent a valuable direction for future research.This critical discourse analysis of Putin's inaugural addresses has offered a window into the evolving nature of political authority in Russia and the discursive strategies through which it is constructed and maintained. By tracing the rhetorical shifts across five speeches spanning more than two decades, we hope that the study contributes to our understanding of how political discourse legitimizes power and shapes public perceptions in contemporary authoritarian regimes.

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Whose war, whose sanctions? Understanding socioeconomic drivers of European attitudes toward the EU's response to Russia's invasion of Ukraine using fuzzy-hybrid topsis

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Abstract

The Russian invasion of Ukraine on 24 February 2022 has had a significant impact on governments and civil society in Europe. In response, the European Union (EU) implemented sanctions to weaken Russia and support Ukraine. This study examines the attitudes of European citizens towards these measures, using data from the 98th Eurobarometer (Winter 2022–23). These attitudes are measured using the Fuzzy-Hybrid TOPSIS methodology, which considers socioeconomic variables such as country, age, gender, political orientation, and location of residence. Additional factors, such as interest in local, national, and European issues, political engagement, perceptions of personal and national economic situations, and views on the EU, were also included in the analysis. Overall, Europeans hold positive opinions of the EU's sanctions, but crucial differences exist: residents of northern countries, individuals actively involved in local and international issues, politically engaged people, and those with a favourable view of the European Union (EU) exhibit more positive attitudes. Conversely, individuals in Balkan countries, those with negative perceptions of personal and national economic conditions, and those with unfavourable views of the EU exhibit more negative attitudes.

Keywords: *Russia Invasion, Ukraine, Europeans Attitudes, EU Sanctions, Fuzzy-Hybrid TOPSIS*

1 Introduction

Russia invaded Ukraine on 24 February 2022, following its annexation of Crimea in 2014 and the subsequent military action. This invasion is Russia's attempt to politically and economically dominate the territory (Anghel and Jones, 2023). The scale and intensity of the attack have resulted in the most brutal warfare in Europe since the Second World War, causing a humanitarian and geopolitical crisis of unprecedented proportions (Kurapov et al., 2023). Not only has the war devastated Ukraine, but it has also greatly affected European societies, raising concerns about traditional security, energy supply security, economic stability, and migration management (Benton et al., 2022; Guild and Groenendijk, 2023; Żuk, 2023).

The war's effects on Europe have been most significant in two respects. Firstly, the invasion's impact on energy markets led all European countries to review their dependence on Russian gas and oil, which pushed prices up and placed an inflationary burden on the continent (Liadze et al., 2022; Ozili, 2024). Secondly, the war also created a record-breaking refugee crisis, forcing millions of Ukrainians to flee their country in search of asylum. This has raised existential questions about solidarity, integration, and the capacity of host states to respond (Anghel and Jones, 2023). These issues have collectively strained the unity of the European Union and its Member States, prompting fervent debates over how best to respond collectively to Russian aggression (Juc, 2023). One of the EU's most notable reactions has been the imposition of sanctions aimed at reducing Russia's economic and political capacity to continue fighting.

The success of such measures depends not only on institutional resolve but also on popular support. In her 2025 State of the Union address, President *von der Leyen* emphasised that 'this has to be Europe's moment of sovereignty… because Ukraine's freedom is Europe's freedom'. She framed the war not just as a regional conflict, but as a struggle for Europe's survival and its ability to defend its values, institutions, and collective security. Europe's sovereignty and Ukraine's sovereignty are synonymous. Therefore, it is essential to understand how EU sanctions are perceived by citizens to determine whether this 'independence moment' can be sustained through popular legitimacy. Using data from the 98th Eurobarometer survey (Winter 2022–23) across 38 countries, the article explains how Europeans perceive EU sanctions on Russia, the level of support for them among their populations, and the reasons behind this support. The effect of socioeconomic characteristics, political engagement, attitudes towards the European Union, and opinions about the individual and national economy on citizens' attitudes are analysed using Fuzzy-Hybrid TOPSIS and the Fuzzy Quadrant Mapper (Indelicato and Martín, 2025).

The remainder of the paper is structured as follows: Section 2 presents the theoretical background. Section 3 presents the dataset and descriptive analysis. Section 4 details the methodology. Section 5 presents the results, which are discussed in Section 6. Section 7 concludes by summarising the key findings and limitations.

2 Brief theoretical context

The Russian invasion of Ukraine is deeply rooted in competing historical narratives and geopolitical tensions. According to Oksamytna (2023), Russian action is less driven by nostalgia for the Russian Empire than by the belief that Ukraine's integration into Europe will destroy Russian power hierarchies. Howlett (2023) challenges the representation of Ukraine as merely a 'borderland' between East and West, instead emphasising its unique identity and centuries-long history of resistance. Ukraine is thus revealed to be not a passive periphery, but a contested ground of ideologies.

Kasianov (2022) reveals that Russian officials continue to perpetuate the myth that Ukrainians and Russians are 'one people', thereby denying Ukraine's sovereignty and justifying aggression. Conversely, Ukrainians assert their own distinctive historical trajectory, interpreting their history as an ongoing battle for independence. This struggle over history has only intensified since the annexation of Crimea in 2014 and the war in Donbas, with Ukrainians increasingly invoking national symbols and collective memory to define their identity (Liu and Mei, 2020). This has not only strengthened their resistance to Russian expansionism but also changed the way Europeans view Ukrainians, no longer seeing them as victims of violence but as ordinary refugees.

The effects of the war are being felt beyond the battlefield, reverberating through global economic and political institutions. Mbah and Wasum (2022) observe that the conflict has destabilised the global energy and food markets and driven up the prices of oil, gas, and wheat. For the EU, which relies heavily on Russian energy, these shocks have manifested as inflationary pressure, increased household spending, and weaker business sentiment (Sun et al., 2024; Zhao et al., 2023). These interruptions also serve to reinforce the impact of Russia's actions as direct threats to European societies, evoking sympathy for Ukrainians as victims of the borderlands and justifying costly EU responses.

Public opinion and emotional mobilisation demonstrate the different treatment of Ukrainians. While social media has amplified narratives of anger, sadness, and solidarity, disinformation has increased polarisation (Fox and Pearce, 2018). Fernández et al. (2023) demonstrate that public opinion has shifted more decisively in favour of a common EU defence policy, showing that the war has not only galvanised positive sentiment for Ukraine, but also for the collective identity of the EU. Gürkan (2024) emphasises the emotional impact of the conflict, observing that the sympathy for Ukrainian casualties and the outrage at Russia's disregard for international law have led to a European response involving defence commitments, sanctions, and aid.

Most remarkably of all, this solidarity has manifested in unparalleled support for Ukrainian refugees. Chitadze (2023) notes that Europe's initial response was characterised by a sense of moral obligation towards Ukraine, contrasting with its policies towards other refugee groups. Savolainen (2023) reports on experimental findings from the UK, which show that attitudes towards refugees have converged significantly according to the latter's origin. Respondents were more willing to help Ukrainians than Yemenis due to greater perceived similarity and lesser perceived threat. This portrays Ukrainians not only as refugees, but also as 'deserving victims', making them worthy recipients of support due to their cultural proximity and political narrative.

Cross-nationally comparative research confirms these processes. Dražanová & Geddes (2023) demonstrates that the public and state reception of Ukrainian refugees varied across eight EU countries, but Ukrainians were always received more hospitably than other groups. In reviewing the latest research, Kentmen-Cin (2025) finds that the initially strong solidarity appears to be gradually wearing off as the cost of the war continues to escalate. This 'compassion fatigue' suggests that deservingness is conditional and based on economic interests and shifting political rhetoric.

Mbah and Wasum (2022) offers the useful analytical concept of 'promising victimhood'. Ukrainians are undoubtedly victims of aggression, but they are also culturally similar, not a security threat, and potentially economically beneficial. These factors render them particularly deserving of assistance, in contrast to refugees from other places who are bound to be viewed with suspicion or resentment. This report explains why assistance to Ukrainians has been unprecedented, but also cautions that this assistance is contingent on their ability to maintain perceptions of their legitimacy.

However, solidarity does not stop there. The war, Mirkina (2018) argue, is an external shock that has triggered 'bellicist' dynamics in the formation of the EU polity. This produces unity on issues such as refugee protection and energy solidarity, but creates more polarised divisions on costly policies such as sanctions. This suggests that the same affective and moral logics that underlie support for Ukrainian refugees are applicable to public opinion on sanctions. In other words, the willingness to bear the economic burden of sanctions represents a translation of humanitarian solidarity into the political realm, even if constrained by political divisions and material interests.

However, Euroscepticism is also a factor. As Palmowski and Fedorov (2020) demonstrate, public support for EU sanctions towards Russia is closely linked to views on democracy, trust in institutions, and perceptions of the EU as an institution. Those who are more trusting of and identified with the EU are more supportive of sanctions, while Eurosceptic and populist attitudes undermine such support. These findings emphasise that the legitimacy of EU action is central to public support for costly commitments beyond humanitarian aid.

Literature illustrates how Ukrainians, who are now facing Russian bombing, have been portrayed as exceptional victims, prompting a level of solidarity that is not extended to other refugee populations. However, sustaining that level of solidarity as it extends to costly economic and political sanctions depends not only on judgments of comparability and deservingness, but also on broader EU orientations and the politicisation of the latter's role.

Building on these observations, our study examines how Europeans position themselves not only in relation to humanitarian solidarity but also in relation to costly policy measures, such as sanctions against Russia. To address this complexity, we employed the 98th Eurobarometer cross-country survey (Winter 2022–23), which allowed us to make comparisons across contexts in which solidarity, economic leverage, EU identity, and Euroscepticism manifest differently. The following section presents the dataset, variables, and indicators used to operationalise attitudes towards sanctions, providing an empirical basis on which to test the dynamics found throughout the European public in the literature.

3 Data and descriptive analysis

Data from the 98th Eurobarometer (Winter 2022-2023) are utilised for this study. This dataset was published approximately one year after the onset of the Russian invasion of Ukraine and aimed to help analyse the solidarity of European citizens with the Ukrainian people. The countries under analysis number 38 and include Norway, Sweden, Kosovo, the Netherlands, Finland, Denmark, Cyprus (TCC and Republic), Lithuania, Latvia, the United Kingdom, Malta, Ireland, Portugal, Spain, Estonia, Switzerland, Poland, Germany (West and East, separately considered), Moldova, Slovenia, Bosnia and Herzegovina, Luxembourg, Croatia, France, Albania, Austria, Czech Republic, Italy, North Macedonia, Belgium, Montenegro, Greece, Slovakia, Turkey, Romania, Hungary, Serbia, and Bulgaria. The sample sizes for each country are shown in Figure 1.

Our analysis focuses on the Eurobarometer elements that delve into the perspectives of European citizens on the measures enacted by the European Union in response to the Russian invasion of Ukraine. These elements aim to scrutinise European citizens' viewpoints on specific issues, encompassing: (1) funding allocated for the procurement and supply of military equipment to Ukraine, (2) economic sanctions imposed on Russia, (3) providing financial assistance to Ukraine, (4) the provision of humanitarian aid to Ukrainians affected by the conflict, and (5) the welcoming of Ukrainian refugees within the EU. Responses to these statements are systematically evaluated on a Likert scale ranging from 1 to 4, with 1 denoting 'Strongly Agree' and 4 signifying 'Strongly Disagree'. The scale is inverted to enhance interpretability, ensuring that higher values correspond to more favourable opinions. The distribution of responses to the statements on the inverted Likert scale is elucidated in Figure 2.

To provide a more comprehensive analysis of European citizens' opinions on the EU's responses to the Russian invasion of Ukraine, the study examines various socioeconomic segments. These include country of residence, gender, age, interest in national, European, and local matters, political interest, perception of the situation in the country, the economy, personal employment, financial situation, the labour market in the country, and public services. Additionally, the analysis will be differentiated based on citizens' diverse perceptions

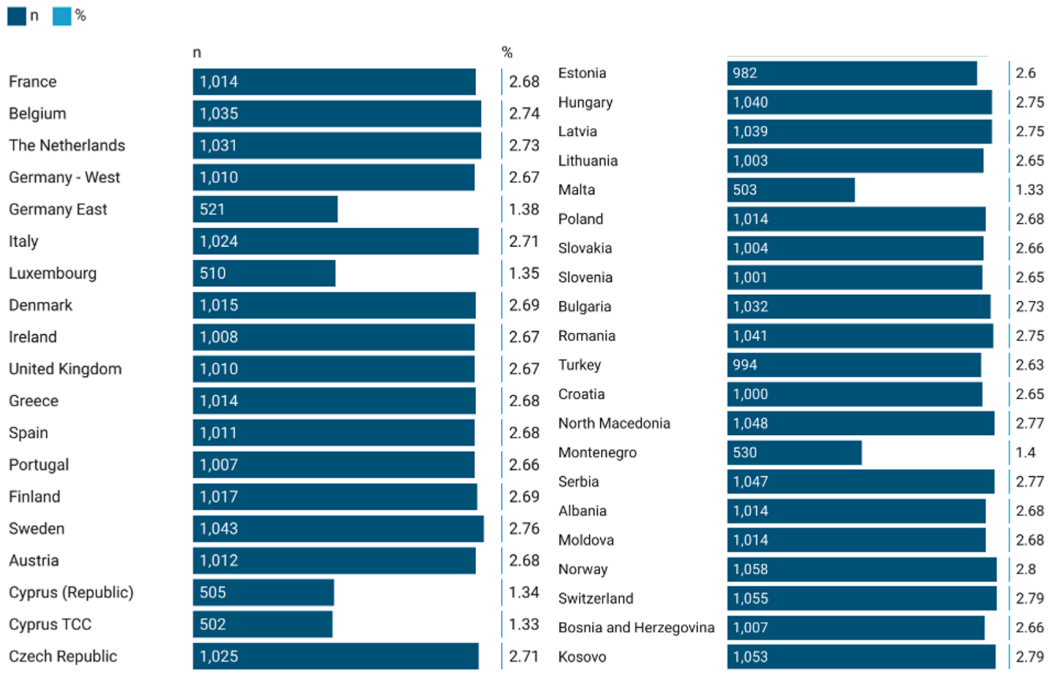

Figure 1 Descriptive Statistics

of the EU, the perception of the threat posed by the Russian war in Ukraine to the EU and national security, and the values of the EU. Finally, respondents' political orientations and place of residence (urban or rural) are also considered.

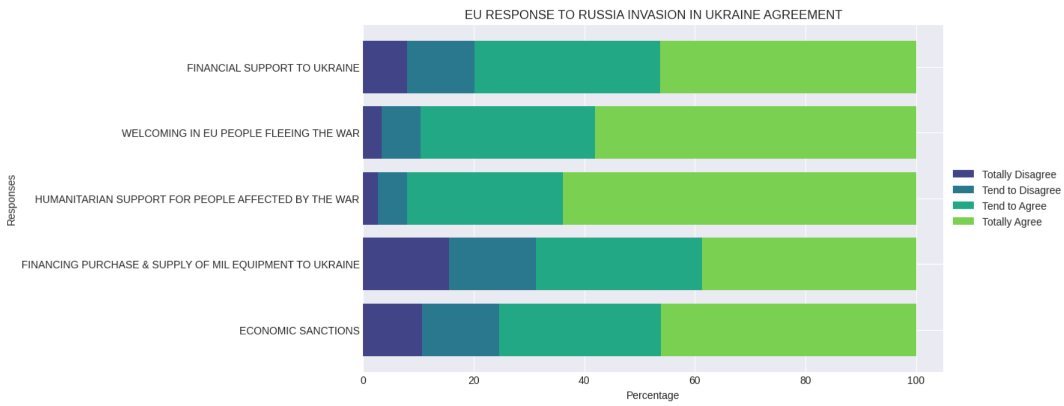

Figure 2 Response distribution across items

4 Methodology

Opinion surveys are susceptible to subjective bias, and respondents may interpret response categories differently (Disegna and Massari, 2018). For example, one respondent's expression of 'very much in agreement' may be interpreted as 'in agreement' by another respondent. To overcome this limitation, we propose a new Fuzzy-Hybrid TOPSIS solution that combines two distinct yet linked approaches (Figure 3). The first approach uses fuzzy set logic to address the vagueness of responses in questionnaires, while the second uses the Technique for

Order of Preference by Similarity to Ideal Solution (TOPSIS) to integrate indicator measures of European opinions on the EU's response to the Russian invasion of Ukraine (ATEUR-RIU).

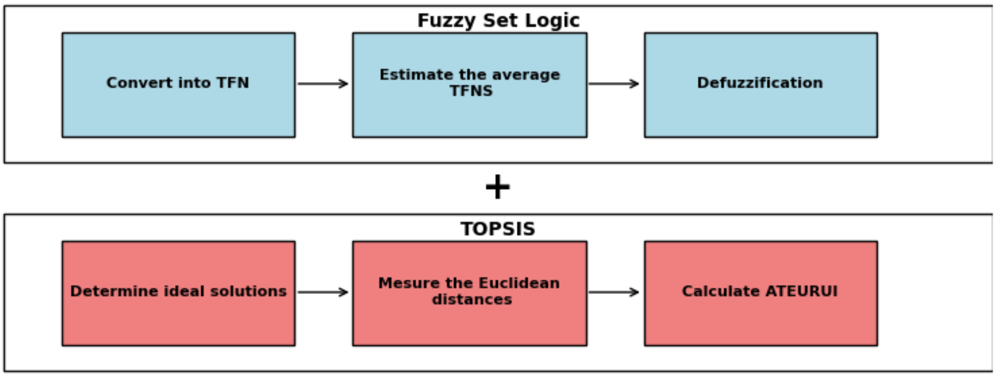

Figure 3 Methodology

This is intended to address the imprecision of survey responses and the relative positioning of respondents on a scale of support. Fuzzy set theory allows for partial membership of response categories rather than definite boundaries, meaning that respondents can be somewhat in agreement and somewhat neutral at the same time. These responses are then converted into triangular fuzzy numbers and defuzzified into quantitative values, without losing the richness of uncertainty or the parameters required for quantitative analysis. TOPSIS then ranks all the profiles based on closeness to an ideal positive point and distance from an ideal negative point. The output is a score between zero and one; the higher the score, the stronger the support for EU action.

By integrating fuzzy logic and TOPSIS, the method provides a detailed yet comprehensible quantitative estimate of public sentiment. It can handle imprecise survey responses, prevent data loss from hard-coding, and provide a ranking system that identifies the degree to which individuals or groups express higher or lower levels of agreement with the EU sanctions. Therefore, the Fuzzy-Hybrid TOPSIS method preserves the diversity of attitudes towards sanctions while producing concise, comparable outcomes between regions and categories.

4.1 Fuzzy Set Logic

Fuzzy sets offer a mathematical framework for addressing non-statistical uncertainty in information data (Zadeh, 1965) and serve as a valuable tool for handling the inherent uncertainty and vagueness present in information (Carlsson and Fullér, 2001; Disegna and Massari, 2018). While classical logic relies on a binary distinction between true and false, in fuzzy logic, a subset A of a set X is mapped by the function x_A as $x_A : X \to [0, 1]$. Thus, fuzzy logic overcomes the limitations of classical two-valued logic and allows for the obtaining of values between 0 and 1 (Mamdani and Assilian, 1999).

Thus, a fuzzy number represents a range of possible values with varying degrees of membership (Nguyen et al., 2005). In this context, Triangular Fuzzy Numbers (TFNs) are a specific type of fuzzy number called 'triangular' because the membership function, which describes the degree of belonging to the fuzzy set, is shaped like a triangle (Anand and Bharatraj, 2017). Thus, a TFN is defined by a tuple of three parameters (a_1, a_2, a_3) ,a lower bound (minimum), a modal value (peak or most likely value), and an upper bound (maximum). These three values form the vertices of the triangular membership function (Anand and Bharatraj, 2017; Wang, 2017). The membership function of a TFN assigns a degree of membership to each possible value within the range defined by the lower and upper bounds (Tseng et al., 2018).

In the context of the study, fuzzy set logic is employed to address the vagueness inherent in information derived from responses of the 98th Eurobarometer (Winter 2022-2023). The transformation of respondents' Likert-type scale responses into TFNs is characterised by a universe of discourse ranging from 0 to 100, as shown in Figure 4. This interval is selected to prevent a loss of generalisation by four intersecting 3-tuples (Cantillo et al., 2021).

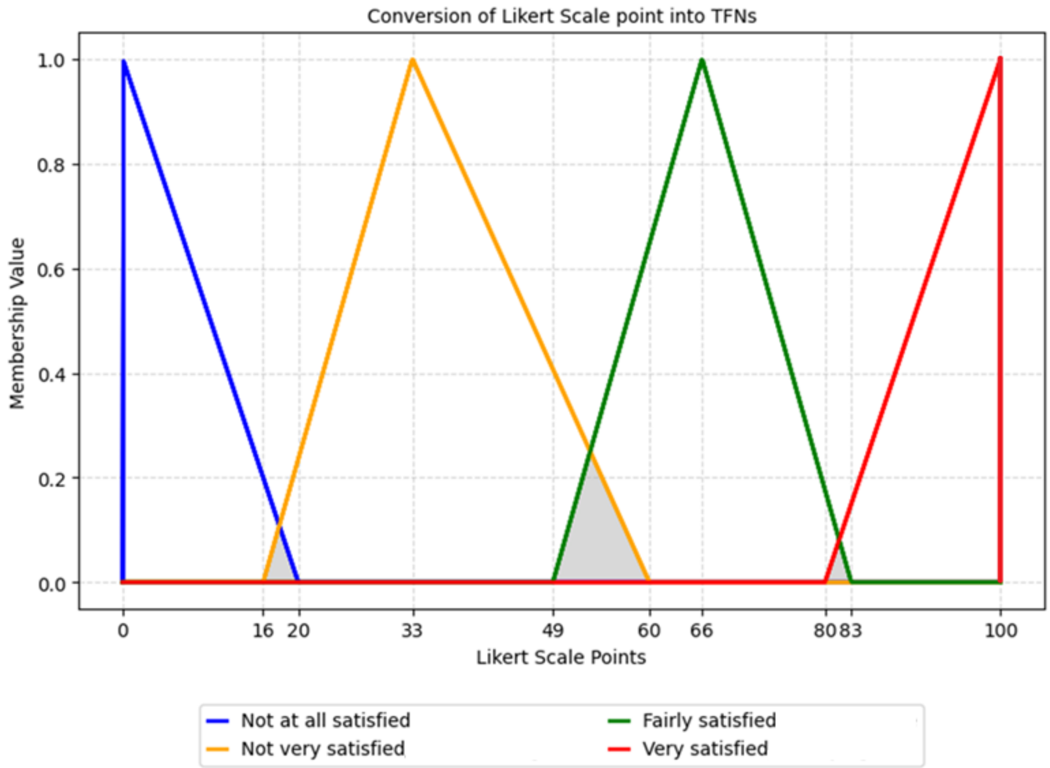

Figure 4 Conversion of Likert Scale points into TFNs

By aggregating the mean for each population segment, a TFN information matrix is obtained. However, the information remains challenging to analyse in its fuzzy form. To address this complexity, a defuzzified information matrix is generated by converting the fuzzy information matrix into a plausible real-number matrix, as vagueness and uncertainty are already managed (Kumar, 2017). Kaufmann and Gupta (1988) introduced a tool for obtaining crisp values from TFNs by calculating the weighted average of the 3-tuple of the respective TFN within the fuzzy information matrix. This awards more importance to the central values, aligning with fuzzy logic principles. The defuzzified value is determined as follows:

$$v_{\tilde{A}} = \frac{a_1 + 2a_2 + a_3}{4} \qquad [1]$$

4.2 TOPSIS

Hwang and Yoon (1981), the TOPSIS approach provides a method for obtaining synthetic indicators. It is widely applied across various disciplines, including tourism (Martín et al., 2020), logistics (Liu et al., 2020), and transportation (Indelicato et al., 2024). In this work, we adopt a hybrid approach, as TOPSIS is not directly applied to raw information but after converting Likert-type data into TFNs. Thus, upon obtaining the defuzzified information matrix, TOPSIS follows three steps to derive a synthetic indicator that estimates the ATEUR-RIU. First, the positive and negative ideal solutions are computed as the maximum and minimum values for each item of analysis, respectively:

$$A_j^+ = \{(maxV_{ij}), j = 1, 2, \ldots, J\}, i = 1, 2, \ldots, m \qquad [2]$$

$$A_j^- = \{(minV_{ij}), j = 1, 2, \ldots, J\}, i = 1, 2, \ldots, m \qquad [3]$$

Here, V_{ij} denotes the defuzzified information matrix, J are the items represented in Figure 2, and ⊠ represents the various segments of the population under analysis. Once the positive and negative ideal solutions are determined, the Euclidean distances between each group and the ideal solution are calculated using Equations [4] and [5]:

$$S_i^+ = \sqrt{\sum_{i=1}^{m} \left(A_i^+ - V_{ij}\right)^2} \qquad [4]$$

$$S_i^- = \sqrt{\sum_{i=1}^{m} \left(A_i^- - V_{ij}\right)^2} \qquad [5]$$

Finally, the TOPSIS indicator measuring ATEUR-RIU is given by the ratio of the Euclidean distance between the negative ideal solution and the sum of the Euclidean distances between the positive ideal solution and the negative ideal solution. Mathematically:

$$ATEUR - RIU_i = \frac{S_i^-}{S_i^+ + S_i^-} \to [0, 1] \qquad [6]$$

5 Results

5.1 Socioeconomic contexts

Figure 5 presents a comprehensive map of the Attitudes Toward the EU Response to the Russian Invasion of Ukraine (ATEUR-RIU) across European countries. The scores range from 0.30 to 0.98. The map reveals distinctive patterns that divide Europe into three major blocks. The first block encompasses Northern European countries and Kosovo, showing the highest values of the indicator. The second block comprises countries with moderate values, situated in Southern and Central Europe. Conversely, the third block includes countries with the lowest values, representing a group with less favourable attitudes towards EU actions. Notably, the Balkan countries and Hungary, on average, exhibit the least favourable attitudes towards EU responses to the conflict in Ukraine.

However, Figure 5 does not illustrate territorial nuances within particular countries. To partially solve this limitation, Figure 6 delves into specific territorial disparities within Germany, contrasting West and East Germany, and within Cyprus, scrutinising distinctions between the Turkish Cypriot Community (TCC) and the Republic of Cyprus. Although Cyprus, on the whole, exhibits higher average values than Germany, significant variations emerge between Cyprus TCC and the Republic. Notably, individuals in the region under Turkish

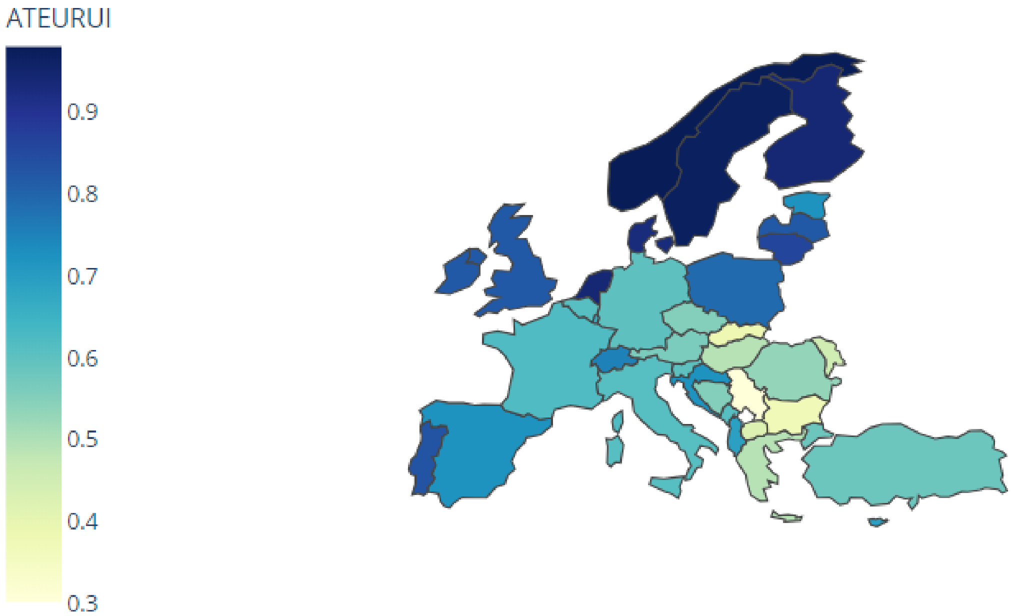

Figure 5 ATEUR-RIU by Country

administration tend to express more positive attitudes towards EU responses. Similar territorial differences are evident within Germany, where the Eastern region shows lower values than West Germany, indicating a disparity in attitudes towards EU responses to the conflict.

Figure 7 provides valuable insights into disparities among gender and various age-class demographics. Slight differences exist between males and females, and it is noteworthy that respondents identifying as other genders (0.06% of the sample) have notably higher values (0.82). When analysing different age groups, the oldest and youngest exhibit more favourable attitudes.

Some differences are identified across political orientations, dividing the respondents into five categories along a left-right axis, with a nuanced distinction among centre-left respondents, who exhibit slightly higher values (0.73). In contrast, right- and left-wing respondents have the lowest values (0.66 and 0.65, respectively). Similarly, those residing in large towns tend to have slightly higher values (0.71) than those in rural areas (0.68) or small towns (0.66).

Table 1 ATEURUI by Political Orientation and Urban-Rural

Variable	Group	ATEURUI	Variable	Group	ATEURUI
Left-Right	Centre-Left	0.73	Urban-Rural	Large town	0.71
	Centre-Right	0.70		Rural area or village	0.68
	Centre	0.68		Small/middle town	0.66
	Right	0.66			
	Left	0.65			

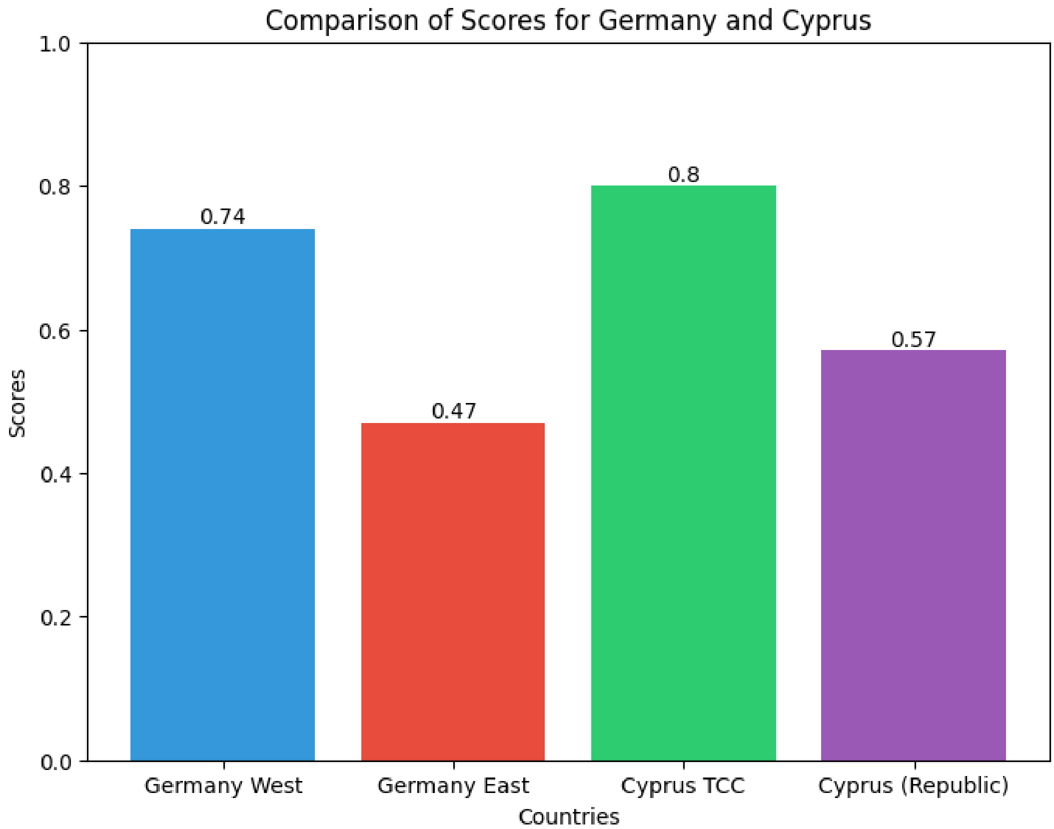

Figure 6 ATEUR-RIU differences within Germany and Cyprus

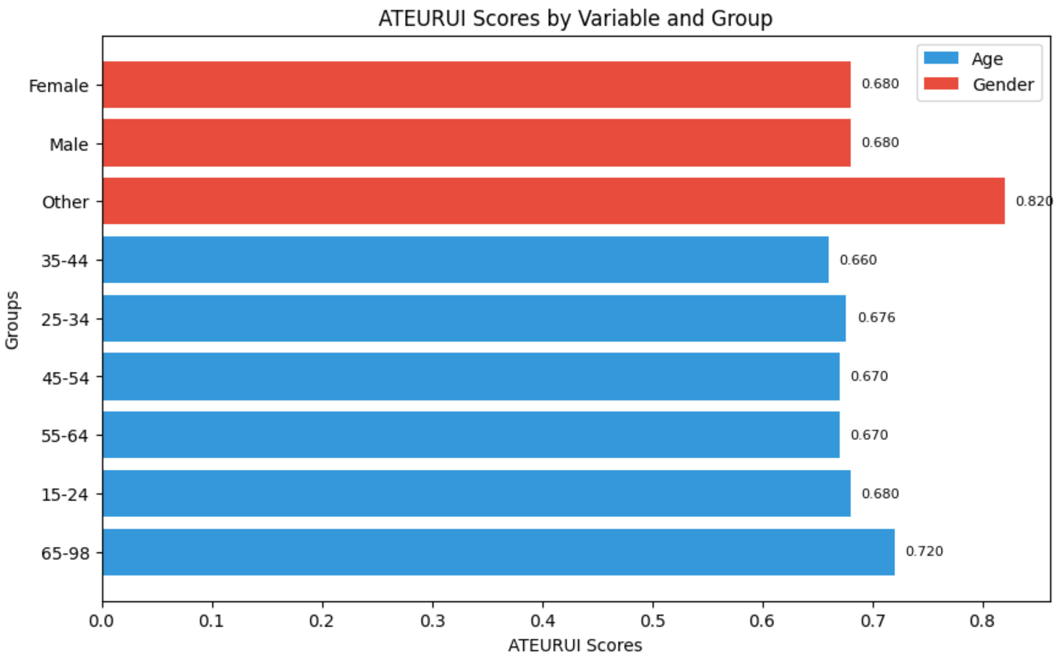

Figure 7 ATEUR-RIU by gender and age

5.2 *Geopolitical Statements Analysis*

Table 2 provides an in-depth analysis of ATEUR-RIU across various population segments, shedding light on the impact of factors such as discussion frequency on national, European, and local matters, political interest, and perceptions related to economic and employment conditions. Individuals who engage frequently in discussions about national (0.72), European (0.73), and local matters (0.71) exhibit higher values than those who discuss these topics occasionally or never (lower than or equal to 0.69). Moreover, individuals with a strong political interest demonstrate higher values (0.73) than those with low political interest (0.66) or no political interest (0.64). When considering respondents' perceptions, those who perceive the situation in their country as very good, as well as those with a positive outlook on the national and European economy, show higher values (0.80 or higher) than those with negative perceptions (0.48, 0.38, and 0.49, respectively). Significant variations are also detected across personal job situations. Respondents who perceive their job situation as very good are associated with the highest value (0.85), whereas those who perceive it as rather bad (0.57) or very bad (0.49) are associated with lower values. Similarly, perceptions of one's financial situation significantly influence ATEUR-RIU values. Respondents perceiving their financial situation as very good show a value of 0.88, while those perceiving it as very bad exhibit a low value of 0.41. The impact of the employment situation is also rather evident. Respondents who perceive the employment situation in their country very well report a value of 0.88, while those who perceive it as very bad report a value of 0.49. Lastly, the perception of public services plays a role, with respondents perceiving the situation as very good presenting higher values (0.86) than those perceiving it as very bad (0.49). These findings highlight the multifaceted influence of various factors on attitudes toward EU responses to the Russian-Ukrainian conflict.

Figure 8 illustrates variations in the index across different statements gauging perceptions of the threat of invasion of the EU, the country, and the EU's commitment to defending European values through its measures in response to the Russia-Ukraine conflict. Individuals who strongly agree with these statements exhibit notably higher values, surpassing 0.85. Conversely, ATEUR-RIU values decline as respondents express increasing disagreement with these statements. Specifically, those who tend to reject the threat of Russia invading the EU present a value of 0.39. Similarly, those expressing scepticism about the threat to their country report values of 0.51, while those questioning the EU's defence of European values register a value of 0.33. The lowest values are observed among those who completely disagree with these statements, with figures plummeting from 0.01 to 0.17.

Finally, this study delves into the impact of individuals' perceptions of the EU image on ATEUR-RIU, as shown in Figure 9. Distinctive patterns emerge across these opinions, revealing that a very positive (0.89) and a fairly positive (0.80) perception of the EU image both positively influence the index. Conversely, individuals harbouring a fairly negative or very negative EU image experience a more negative impact, registering values of 0.46 and 0.22, respectively.

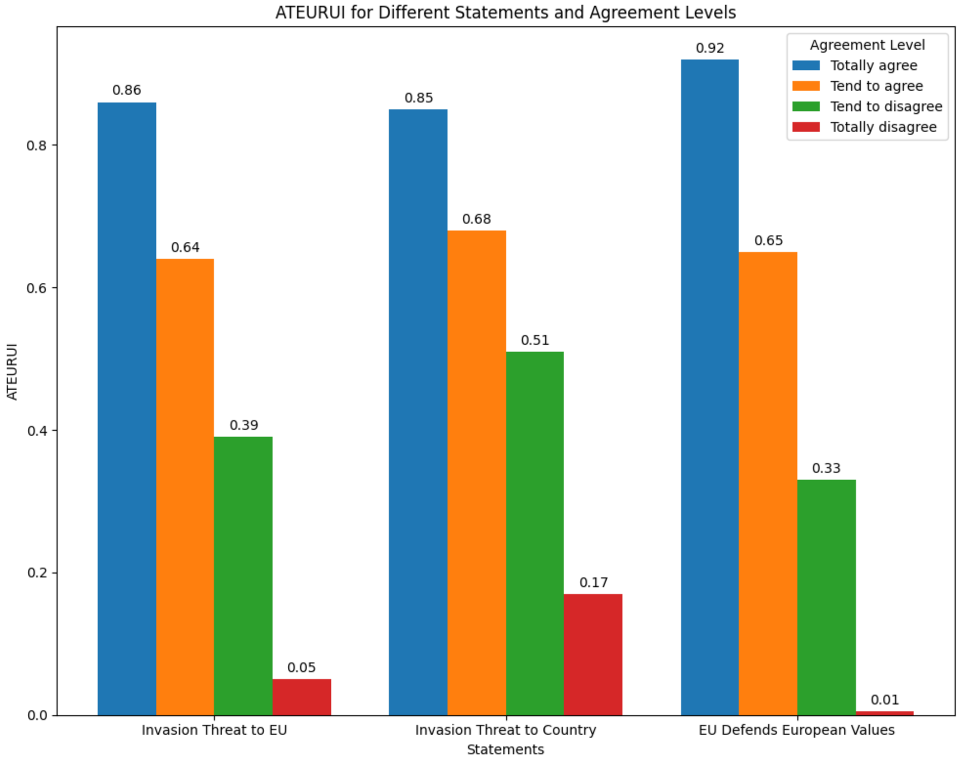

Figure 8 ATEUR-RIU according to statements about threat perception and European values

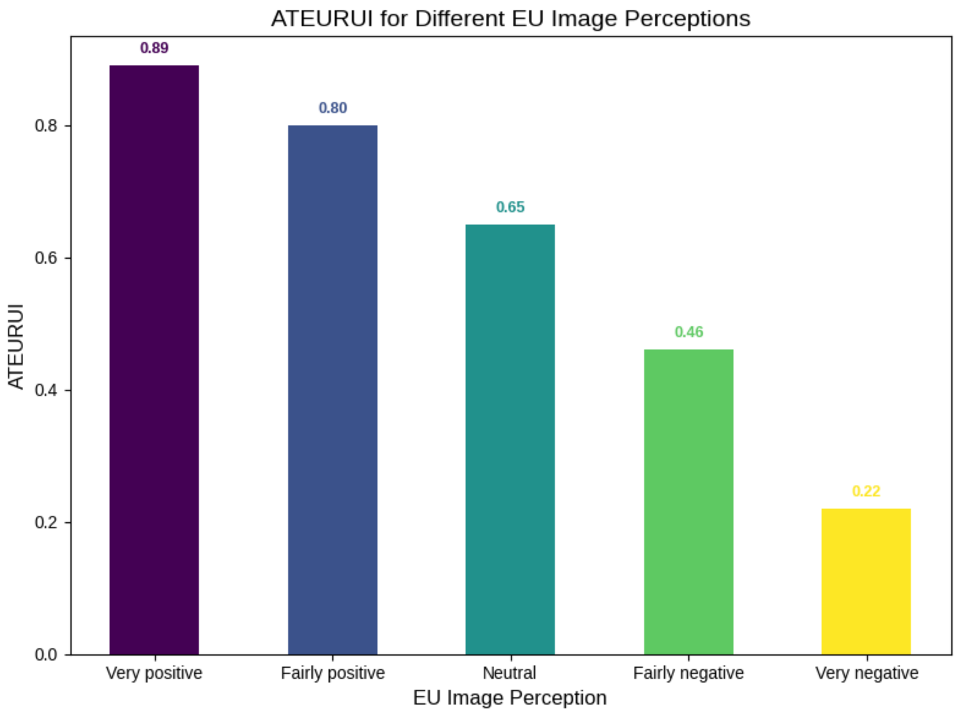

Figure 9 ATEUR-RIU according to EU image perception

Table 2 ATEURUI according to geopolitical statements

Variable	Group	ATEURUI	Variable	Group	ATEURUI
National matters	Frequently	0.72	**European economy situation**	Very good	0.80
	Occasionally	0.68		Rather good	0.77
	Never	0.64		Rather bad	0.64
European matters	Frequently	0.73		Very bad	0.38
	Occasionally	0.69	**Personal job situation**	Very good	0.85
	Never	0.64		Rather good	0.70
Local matters	Frequently	0.71		Rather bad	0.57
	Occasionally	0.68		Very bad	0.49
	Never	0.66	**Financial household situation**	Very good	0.88
Political interest	Strong	0.73		Rather good	0.72
	Medium	0.68		Rather bad	0.55
	Low	0.66		Very bad	0.41
	Not at all	0.64	**Country employment situation**	Very good	0.88
Country situation	Very good	0.84		Rather good	0.75
	Rather good	0.79		Rather bad	0.62
	Rather bad	0.63		Very bad	0.49
	Very bad	0.45	**Public services situation**	Very good	0.86
National economy situation	Very good	0.84		Rather good	0.74
	Rather good	0.79		Rather bad	0.63
	Rather bad	0.66		Very bad	0.49
	Very bad	0.48			

6 Discussion

Our research shows that Europe is divided into three categories based on citizens' views of the European Union's actions concerning the conflict in Ukraine. These views range from full support to general criticism, reflecting mixed opinions. The first group comprises Northern European countries and Kosovo, which have a strongly positive attitude towards the EU's initiatives. The second group comprises Central and Southern European nations with more moderate attitudes towards the EU's response. The third group comprises the Balkan states and Hungary, which collectively have the most negative views.

These groupings should not be regarded as mere descriptive classifications, but rather as phenomena that can be explained by including theoretical and historical models. Northern European countries, particularly those in Scandinavia, have traditionally been regarded as models of welfare-state consolidation and accommodating democracy, which amplify institutional trust and EU identification (Marozzi, 2015). Their historical commitment to multilateralism and integration within Europe may partly explain their unwavering support for EU initiatives concerning Russia. On the other hand, the Balkan countries exhibit the effects of post-socialist transition, characterised by weak institutions and contentious processes of national identity formation. As Jović (2018) argues, this history has resulted in long-standing Euroscepticism and scepticism regarding supranational power, making resistance to EU sanctions more likely. Hungary is a good example of how domestic politics can influence public opinion. Its leadership has consistently taken a negative stance towards Brussels and a neutral stance towards Moscow for most of the past decade. This factor has contributed to diminished public support for EU sanctions (Ivanov and Laruelle, 2022). Southern and Central European countries adopt intermediate stances, which are moderated by their economic vulnerability to sanctions and their mixed perceptions of EU membership. These differences align with research on Euroscepticism, which indicates that economic reliance, historical factors, and elite influences predict variations in attitudes across countries (Palmowski and Fedorov, 2020). They also corroborate Kentmen-Cin (2025)'s findings that initially high levels of support for EU activity have diminished as the cost of war escalates.

Those who engage more in political discussions and have a greater interest in politics tend to express stronger support for EU action. This suggests that political engagement increases awareness of the geopolitical interests at play in times of war, which aligns with theories of elite cue-taking and political socialisation (Clark and Hellwig, 2012). Second, literature on party alignment suggests that support for sanctions is often influenced by national parties' positions on Europe and foreign affairs. This is because voters use these positions as a way of understanding complex foreign affairs (Hooghe & Marks, 2018). Countries where political elites prioritise Eurosceptic frames show less support, whereas contexts in which elites frame sanctions as acts of solidarity and the defence of shared values show more. These findings support the idea that sanctions backing is not merely a rational economic choice, but rather an extension of the same moral and political rationalities that guided solidarity with Ukrainian refugees (Mirkina, 2018).

In addition to regional and political divisions, the research also considers generational and educational factors. Although the gender gap is slight, younger groups express more favourable attitudes towards EU actions, corroborating earlier work which found that exposure to European institutions in an experimental setting can implant lasting pro-EU dispositions (Ringlerova, 2019). These results suggest the consolidation of long-term support for European integration, as younger, more educated citizens increasingly replace older, more sceptical generations (Down and Wilson, 2013). They also align with Dražanová & Geddes (2023) study, which demonstrated cross-country heterogeneity in the willingness to accept Ukrainian refugees. This suggests that generational cohorts and their formative experiences determine the limits of European solidarity.

Perceptions of the economy also influence attitudes towards sanctions. Those with positive views of their national and individual economic circumstances tend to have higher ATEUR-RIU values, whereas those with negative views tend to have lower values. This is consistent with studies linking citizens' well-being and approval of EU policies, whereby trust in the economy enhances trust in collective action (Bevan et al., 2016). Conversely, during periods of economic crisis, people prefer local or national solutions, perceiving EU action as distant from their immediate needs (Braun et al., 2019). This confirms an observation of political economy that has been evident for years: that citizens' support for costly foreign policy arrangements depends on whether they are economically secure enough to support them. The findings are in line with the fact that public support for costly humanitarian and foreign policy measures is vulnerable to waning when economic interests are taken into consideration (Kentmen-Cin, 2025).

Finally, threat perception is the most significant catalyst of attitudes. People who view Russia's invasion as a significant threat tend to support EU measures more, which is consistent with securitisation and collective defence frameworks. This impact is further compounded by historical legacies in border states such as Finland and the Baltic states, which have memories of past conflicts with Russia (Forss, 2009; Outeda, 2025), as well as Poland, which has acted as a geopolitical buffer between East and West for centuries (Palmowski & Fedorov, 2020). However, threat perceptions are also influenced by economic interests: citizens in states that are more vulnerable to energy or fossil fuel prices place greater weight on material consequences when making judgements about sanctions (Gueorguiev and Steinberg, 2020). This explains Sinclair's et al. (2024) finding that approval for Ukraine and Ukrainians (and, by extension, EU action against Russia) is based not only on solidarity, but also on similarity and threat perceptions.

Overall, these three clusters of European positions on EU sanctions are not random classifications but reflect historical paths, institutional confidence, party cues, and economic fragilities. By placing our analysis within the broader literature on Euroscepticism, post-socialist transformation, political identification, solidarity, and threat perception, we demonstrate that opinions on EU sanctions are firmly rooted in the moral rationalities that portray Ukrainians as 'promising victims' (Mbah and Wasum, 2022) and the structural factors that determine the extent of solidarity in the face of costly policy commitments.

7 Conclusion

In conclusion, this research has revealed the complex interactions influencing European citizens' opinions regarding the EU sanctions imposed on Russia following the invasion of Ukraine in early 2022. An innovative approach based on fuzzy methodology was employed to analyse these attitudes and examine how various socio-economic factors interact. Different factors, such as country of residence, age, gender, and political orientation, as well as personal perceptions of employment, economic situation, geopolitical threats, and the EU's commitment to defending European values, have been analysed. The data for this study were drawn from the 98th Eurobarometer, covering winter 2022-2023, providing a solid foundation for a thorough analysis of citizens' attitudes.

Significant variations emerge between European countries, demonstrating how cultural, historical, and socio-economic differences can profoundly influence perceptions and public opinions on complex geopolitical issues. The analysis of age groups revealed that both young and older individuals have more favourable attitudes towards EU actions, reflecting greater sensitivity and openness to European issues among marginalised groups and generations that have experienced periods of stability and economic growth under the EU's influence. Another key finding from the study is the importance of economic and employment perceptions in shaping the attitudes of European citizens. This highlights the need for effective communication and economic policies that promote stability and well-being, thereby maintaining and strengthening public support for the EU.

The present study has limitations, which offer insights for future research. Although data were collected in winter 2022-2023, this timeframe may not be sufficient to capture long-term opinions of European citizens on sanctions. Examining how these perceptions evolve and identifying the main factors influencing public opinions are crucial issues that will be important to scrutinise in the future. Additionally, it would be beneficial to further consider socio-economic factors, such as education level, employment sector, and trust in national and European institutions, to achieve a more comprehensive analysis. It is also important to explore how direct or indirect experiences with EU programmes and policies, such as benefits from regional development programmes, might influence citizens' opinions. Finally, another promising area for future research is the analysis of the influence of European and international media on citizens' perceptions of the conflict and sanctions.

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Willingness to pay for pollution prevention among Transylvanian Hungarians.: A comparative sociological analysis based on EVS data

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Abstract

This study addresses whether Transylvanian ethnic Hungarians exhibit distinctive environmental attitudes compared to populations in Hungary and Romania, specifically examining what sociodemographic and attitudinal factors drive willingness to pay (WTP) for pollution prevention. We argue that minority status and regional context produce unique pathways to environmental engagement that reflect cultural identity rather than political motivations. Using binary logistic regression analysis on European Values Study 2017 data, we compare three samples: Transylvanian Hungarians (N=1,106), Hungarians (N=1,514), and Romanians (N=1,613). Results reveal that Transylvanian Hungarians demonstrate the highest WTP levels (64primarily by geographic concentration in ethnically Hungarian regions, education, altruism, and trust in environmental organizations. Unlike Hungary, where WTP correlates with urban residence, political interest, and income, Transylvanian Hungarian environmental concern operates as depoliticized philanthropy rooted in rural areas with strong ethnic identity. Romanian patterns show minimal predictive structure and negative political engagement effects. These findings suggest that environmental policy implementation in minority regions requires understanding culturally embedded rather than politically motivated environmental citizenship.

Keywords: *environmental concern, contingent valuation, ethnic Hungarians, European Values Study, survey*

1 Introduction

This study examines willingness to pay (WTP) for pollution prevention among Transylvanian ethnic Hungarians, a population largely absent from environmental attitude research. To carry out this analysis, we rely on the 5th 2017 wave of the European Values Study (EVS), which, in its related questionnaire, included the following item to assess the willingness to pay for the environment: 'I would give part of my income if I were certain that the money would be used to prevent environmental pollution.' The 2017 European Values Study (EVS) represents the first opportunity to systematically compare environmental attitudes of this minority population with their co-ethnics in Hungary and the majority population in Romania, using standardized measures across all three contexts.

We investigate whether Transylvanian Hungarians exhibit distinctive patterns of environmental WTP compared to populations in Hungary and Romania, and what sociodemographic and attitudinal factors drive these differences. Drawing on Social Identity Theory (Tajfel and Turner, 1979) the analysis asks whether minority status produces distinctive environmental attitude patterns reflecting in-group distinctiveness seeking, or whether acculturation processes lead to convergence with majority population attitudes.

This research contributes to minority studies by examining how ethnic minorities navigate environmental concerns (Hoyos et al., 2009) within majority-dominated political systems, potentially revealing distinct pathways to environmental engagement that differ from both co-ethnic and majority populations. We investigate whether Transylvanian Hungarians exhibit distinct environmental WTP characteristics, potentially manifesting as altruistic rather than politically motivated engagement. This could reflect their bicultural positioning between Hungarian heritage frames emphasizing environmental values (Feischmidt, 2008) and Romanian institutional contexts.

The originality of this research lies in three key contributions. First, it provides the first exploratory systematic analysis of environmental attitudes among Transylvanian Hungarians using internationally comparable data. Second, it offers a unique three-way comparison that illuminates how minority status, national context, and ethnic identity shape environmental concern. Third, it extends contingent valuation research to an understudied population whose environmental attitudes may reflect distinct patterns due to their position as a national minority in a post-socialist context.

Following a review of Transylvanian Hungarian socio-cultural context, CV methodology, and established WTP determinants, we formulate and test hypotheses using EVS 2017 data from all three populations.

2 Literature review

2.1 Hungarians from the Transylvanian region of Romania

Transylvania is a historical province of Romania within the Carpathian Arc, comprising 107,000 km², with approximately 1.2 million Hungarians (19% of Transylvania's population, 6.5% of Romania's). Hungarians constitute Romania's largest ethnic minority (Culic, 2006) and the most numerous Hungarian group outside Hungary (Kiss, 2015), making them one of Europe's most significant native national minorities (Veres, 2012).

Hungarians in Transylvania maintain strong cultural, political, and familial ties with Hungary (Kiss et al., 2022) while functioning as an autonomous society through extensive institutional systems (educational, religious, political, cultural). This creates dual identity: Hungarian cultural-national attachment combined with Romanian civic belonging through citizenship ('Romanianness') (Veres, 2012).

Hungary's 2010 simplified naturalization law which enabled citizenship acquisition without residency requirements significantly reshaped relations with Transylvanian Hungarians (Moreh, 2019). This intervention did not trigger Romanian countermeasures, allowing Transylvanian Hungarians to maintain dual legal status (Csergő et al., 2025). Pogonyi (2019) demonstrates that the citizenship extension institutionally reinforced rather than created identities, formally acknowledging Hungarian belonging while preserving Romanian minority integration, i.e., what Veres (2012) termed 'dual identity'. Kiss and Toró (2021)'s survey confirms this stable dual positioning combines Hungarian ethnic attachment with pragmatic Romanian civic integration. Waterbury (2025) and Moreh (2019) argue that post-2010 policies politically restructured this relationship: while ethnic identity remained stable, Transylvanian Hungarians became increasingly embedded in Hungarian resource flows, loyalty expectations, and institutional dependencies, with identity progressively articulated through Hungary's nation-building project.

Despite this shared dual identity and transnational citizenship status, Transylvanian Hungarians are far from homogeneous, corresponding to diverse ethnolinguistic regions (Kiss, 2015). These regions vary significantly in ethnic concentration and socioeconomic development. Szeklerland forms the most compact Hungarian community with a traditional, rural character and strong regional identity; Partium/Crișana along the Hungarian border contains the second-largest group; Central Transylvania (Cluj-Napoca, Târgu Mureș) represents more urbanized communities; while Northern, Southern Transylvania and Banat contain dispersed populations (Figure 1).

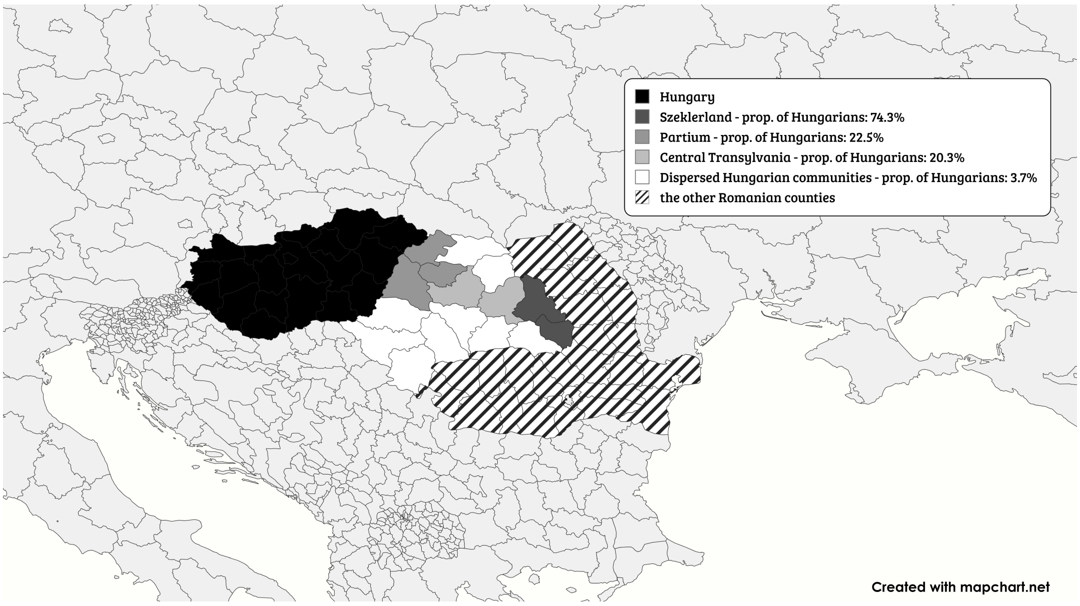

Figure 1 The researched regions and countries

Despite intra-regional differences, socioeconomic analyses show Hungarian minorities' less favorable position overall: lower wages, education levels, and urban middle-class representation compared to the Romanian majority (Kiss, 2015). Ethnic Hungarians' social capital is primarily bonding-type, enabled by dense institutional networks serving minority needs, creating pronounced ethnic parallelism between Hungarian and Romanian communities (Csata, 2015).

Scholarship on Hungarian-Romanian intergroup relations deepens this understanding. Kiss (2018) demonstrates that post-1989 developments reflect 'unequal accommodation': formal minority rights coexist with persistent ethnic stratification, marginalization, and asymmetric power relations, with ethnic parallelism enabling cultural reproduction while constraining economic integration. Brubaker et al. (2006) documented that everyday ethnicity operates through subtle mechanisms (language, institutions, residence) rather than overt conflict, creating a persistent gap between nationalist political rhetoric and daily pragmatic cooperation.

2.2 Social identity and environmental concern

The dual identity framework outlined above, wherein Transylvanian Hungarians simultaneously function as Romanian citizens and Hungarian transborder nationals, raises theoretical questions about how minority positioning shapes environmental attitudes.

Social Identity Theory (Tajfel and Turner, 1979) suggests individuals derive identity from group memberships, adopting group norms and comparing in-groups favorably to out-groups. To maintain positive distinctiveness, minorities often emphasize superior group characteristics. Research shows that generosity, altruism, cleanliness, and tidiness constitute central elements of Transylvanian Hungarian collective self-representation (Papp, 2012). Within Hungarian discourse, Transylvania is portrayed as environmentally and culturally authentic, preserving traditional architecture, pristine nature, and social solidarity (Feischmidt, 2008). By directly linking environmental preservation with ethnic identity, this narrative establishes environmental stewardship as a potential positive distinctiveness marker. Social Identity Theory predicts that when environmental values become associated with in-group characteristics (Hoyos et al., 2009), minority members may exhibit stronger environmental attitudes as identity maintenance and expression. The positive distinctiveness mechanism suggests that when environmental stewardship becomes associated with valued in-group characteristics, minority members will exhibit stronger environmental attitudes to differentiate themselves favorably from the majority out-group (Tajfel and Turner, 1979). For Transylvanian Hungarians, environmental philanthropy may function as a marker of moral superiority, community altruism and responsibility contrasting with perceived Romanian pragmatism. Distinctiveness motivation should be strongest in ethnically concentrated areas where in-group identification is highest, while Hungarians in dispersed communities experiencing greater intergroup contact should adopt attitudes more similar to the Romanian majority. Alternative theoretical frameworks offer competing predictions for minority environmental attitudes. Acculturation theory suggests that environmental attitudes should vary based on cultural adaptation patterns, with more Romanian-acculturated Hungarians (typically urban, dispersed) showing environmental patterns closer to the Romanian majority, while less acculturated Hungarians (rural, concentrated) maintain distinctive environmental philanthropy (Berry, 1997). Minority group threat theory provides another lens, suggesting that environmental concern represents a safe form of civic engagement for minorities, allowing community values expression without directly challenging majority political control (Blumer, 1958).

The concept of cultural in-betweenness can be theoretically grounded in bicultural identity theory, which suggests that individuals with dual cultural memberships alternate between cultural frames depending on context (Hong et al., 2000). Transylvanian Hungarians may activate Hungarian cultural frames (emphasizing communal environmental responsibility) when expressing environmental philanthropy while simultaneously operating within Romanian institutional frames (characterized by political skepticism and economic pragmatism). This theoretical framework generates specific cross-group predictions: Hungary should exhibit standard Western civic engagement patterns in environmental WTP (income, political interest, urban residence) due to majority status and democratic consolidation; Romania should show weakly structured environmental WTP due to post-communist institutional distrust and economic prioritization; while Transylvanian Hungarians should display identity-maintenance patterns (education, ethnic concentration, altruism) reflecting their unique position as a cultural minority seeking positive distinctiveness through environmental stewardship.

2.3 The contingent valuation method and willingness to pay

Willingness to pay (WTP) questions employ the contingent valuation (CV) method, which estimates the economic value of nonmarket goods such as environmental quality (Hanemann, 1994). CV surveys present environmental scenarios and ask about monetary commitment to solutions, quantifying environmental concern through hypothetical market behavior (Liebe et al., 2011). WTP questions tap moderate environmental activism requiring financial sacrifice without physical risk, making them suitable policy support indicators (Vicente et al., 2021) and interpretable as a specific component of general environmental concern (Franzen and Vogl, 2013). CV surveys vary from general WTP questions to detailed scenarios (Carson et al., 2001; Liebe et al., 2011).

WTP measures face several well-documented limitations. The primary concern is hypothetical bias: research shows that respondents overstate willingness to pay when no real payment is required, as the absence of financial consequences allows them to disregard budget constraints (Loomis, 2011; Penn and Hu, 2018). Related concerns include the 'warm glow' effect, whereby moral satisfaction from expressing pro-environmental attitudes inflates responses (Kahneman and Knetsch, 1992), and scope insensitivity, whereby WTP fails to increase proportionally with the magnitude of environmental improvement (Carson and Hanemann, 2005). The WTP-WTA (willingness to accept) disparity presents another challenge: respondents usually demand two to four times more compensation to accept environmental losses than to prevent them, reflecting loss aversion (Tunçel and Hammitt, 2014). Protest responses expressing ethical objections (Mitchell and Carson, 1989) and validity concerns requiring rigorous survey design (Jorgensen, 2023; Perni et al., 2021) present additional challenges.

Despite these limitations, WTP measures remain widely used in environmental sociology as indicators of environmental concern and policy support (Baumgärtner et al., 2017). Methodological recommendations include avoiding overly abstract formulations (Carson et al., 2001), using closed questions since respondents struggle with exact amounts (Hanemann, 1994), and interpreting responses through attitudes (Kotchen and Reiling, 2000).

The EVS 2017 WTP question, while lacking the scenario detail necessary for precise monetary valuation, can be used for comparative attitudinal research across diverse societal contexts (Carson et al., 2001). This design aligns with our analytical focus on relative differences in WTP determinants across groups rather than absolute payment amounts, substantially reducing concerns about hypothetical bias magnitude.

2.4 Determinants of the WTP

Liebe et al. (2011) identify five approaches: the economic model (income and environmental benefit), the public good theory (trust and reciprocity), the attitude-behavior paradigm (environmental attitudes), altruistic models (concern for others), and norm activation theory (moral responsibility). While income, trust, altruism, social norms, and environmental attitudes consistently emerge as key WTP factors, findings vary across contexts. The economic model emphasizes income (Ivanova and Tranter, 2008) as the primary WTP determinant, though correlations remain weak at individual (Combes et al., 2018) and societal (Gelissen, 2007) levels. Education often proves more influential than income, particularly in East-Central Europe (Lee and Norris, 2000). Age shows inconsistent relationships with WTP across studies, while women exhibit slightly higher WTP cross-culturally (Franzen and Vogl, 2013).

Urban residents may exhibit higher WTP due to greater environmental problem exposure (Franzen and Vogl, 2013), while place attachment and local environmental identity can strengthen rural residents' WTP when environmental issues directly affect their community (Brehm et al., 2013; Nielsen-Pincus et al., 2017). Social Identity Theory (Tajfel and Turner, 1979) suggests that place–based identities motivate environmental protection through feelings of belonging and shared responsibility, potentially increasing WTP. Left-wing political identification consistently predicts environmental concerns. Studies in the USA (Dupont and

Bateman, 2012) and cross-national analysis using EVS/WVS (Neumayer, 2004) and ISSP data (Ivanova and Tranter, 2008) consistently show that left-wing voters express greater WTP for environmental protection. This association appears weaker in Central and Eastern Europe, possibly reflecting lower environmental issue salience in post-communist political divides (Todor, 2018) or high non-response rates to political questions. Political interest may independently influence environmental WTP (Drews and van den Bergh, 2016), particularly for minority communities prioritizing competing policy concerns (Malin and Ryder, 2018). Some research suggests religious conservatives show higher environmental concern when controlling for political orientation (Hekmatpour, 2022; Lalot et al., 2022).

Research generally finds positive correlations between environmental attitudes and WTP (Kollmann and Reichl, 2015), although methodological differences across studies complicate direct comparisons (Meyer and Liebe, 2010).

Interpersonal and institutional trust (Liebe et al., 2011) significantly influences WTP, with high-quality governance contexts (Davidovic and Harring, 2020) fostering citizen trust and environmental policy support. Trust in state capacity emerges as particularly important for environmental tax acceptance (Todor, 2018). Charitable giving studies show that misuse of public money, corruption, and organizational distrust limit giving in general (Ferrara and Missios, 2020), dynamics likely to affect environmental WTP similarly.

Both pure altruism (concern for others' well-being) and impure altruism (personal satisfaction from doing good) positively influence environmental WTP (Duncan, 2004; Lundberg et al., 2019). This 'warm glow' effect suggests that stated WTP combines genuine environmental concern with moral satisfaction (Guagnano, 2001). While this complicates interpretation of absolute values, it does not undermine comparative analysis across populations.

This literature review reveals that WTP determinants vary across cultural and political contexts, suggesting Western findings may not directly apply to post-communist minority populations. Our comparative approach tests whether established WTP theories hold for Transylvanian Hungarians or whether their unique sociocultural position produces distinctive patterns.

3 Materials and methods

3.1 Hypotheses

Based on the literature review, we formulate hypotheses recognizing that minority status may produce different environmental attitude patterns than those found in majority populations. We expect income (H1) and education (H2) to positively predict WTP, with education particularly important in post-communist contexts and for minority identity maintenance. Reflecting place attachment and cultural authenticity narratives, we hypothesize rural residence and regional Hungarian concentration will positively predict WTP among Transylvanian Hungarians, contrasting with typical urban patterns (H3). Environmental attitudes (H4) should predict WTP across samples, potentially more strongly among Transylvanian Hungarians where environmental concern may reflect cultural identity. Altruism (H5) should predict WTP, especially among Transylvanian Hungarians, emphasizing community-oriented values. We expect institutional and interpersonal trust (H6) to influence WTP, with trust in environmental organizations potentially more important than political trust for Transylvanian Hungarians. Overall, we expect Transylvanian Hungarian WTP to be driven primarily by cultural and community factors (education, altruism, ethnic concentration) rather than political engagement, consistent with environmental concern serving as identity expression rather than political activism.

3.2 Data

This study analyses data from the 2017 European Values Study (EVS). Data collection occurred from 2017 to 2021, with delays due to COVID-19. EVS 2017 covers nationally representative samples of adults (18+) from 36 countries plus four minority regions, including the Hungarian minority in Transylvania, Romania. The analyses use the special Transylvanian Hungarian sample (N=1,106) (EVS, 2020) and two integrated datasets covering the Hungarian (N=1,514) and the Romanian (N=1,613) samples (EVS, 2022). Hungarian and Romanian samples used stratified random sampling based on electoral rolls and resident population data, respectively. The Transylvanian Hungarian sample was obtained through a three-stage design combining stratified random selection of settlements, random-route household selection, and quota-based respondent selection. While quota sampling for Transylvanian Hungarians differs from random sampling for Hungary and Romania, all samples achieve representativeness within target populations. The 2017-2021 collection period may introduce temporal variation, though unlikely to significantly affect environmental attitudes.

A methodological challenge arose from the dual database structure: data from Hungary and Romania are in the integrated EVS dataset. The Transylvanian Hungarian data form a separate dataset with different variable structures. We therefore constructed a merged dataset containing 360 common variables to enable three-way comparisons across samples. For Transylvanian Hungarian-specific analysis, we retained additional spatial variables (regional and administrative divisions) not present in the integrated dataset.

3.3 Variables and methods

In the EVS 2017, environmental attitudes were measured using six questions in the questionnaire (Q56 and Q57, V199-V204). Five of these items were assessed through a five-point Likert scale statement: 1. willingness to give up part of one's income for pollution prevention (WTP); 2. it is too difficult to do too much for the environment; 3. there are more important things in life than protecting the environment; 4. doing something for your environment is useless if others don't do the same and 5. claims about environmental threats are exaggerated. The sixth dichotomous question contrasts environmental protection with economic growth (EVS, 2022).

Out of these variables, the primary focus of our study is on the Likert variable that assesses willingness to pay: 'I would give part of my income if I were certain that the money would be used to prevent environmental pollution.' This dependent variable captures a behavioral intention rather than an abstract environmental opinion, requiring respondents to consider concrete personal sacrifice and thus represents a universal and comparable indicator of environmental commitment intensity.

Following the practice of previous studies (Carson et al., 2001; Liebe et al., 2011) we have transformed this variable into a binary variable: 1 = willing to pay, i.e., WTP (the agree and strongly agree responses) and 0 = not willing to pay (neither agree nor disagree, disagree and strongly disagree response categories). We conducted bivariate analyses to examine cross-regional differences in environmental concern, followed by binary logistic regression to model WTP determinants. Separate analyses for each population, rather than a pooled approach, enabled identification of group-specific predictive patterns. This analytical choice recognizes that WTP determinants may operate differently across the three contexts due to varying political systems, economic conditions, and cultural frameworks. Separate models allow all parameters (not just intercepts) to differ between populations, providing more nuanced insights into how factors like education, income, or trust function differently for

Transylvanian Hungarians compared to populations in Hungary and Romania.

The explanatory and control variables used in our studies are summarized in Table 1. There is a total of 20 variables, out of which 15 variables are common to all three regression models; four variables are only present in the Transylvanian Hungarians database (SD7-SD10); and one variable (SD5) is only present in the model comparing the three regions (in the absence of a city-county breakdown, we controlled for the size of the settlement). Thus, we used 19 explanatory variables in the model for Transylvanian Hungarians and 16 variables to compare the three regions/samples.

Table 1 The description of the explanatory variables

Explanatory variables	Measure	Min. and max. values/ Categories
Socio-demographic variables (SD, ten items)		
Age (SD1)	scale	Min. = 18 Max. = 82
Male (SD2)	binary	Female (0) Male (1)
Education (years): age of the respondent of completed formal education (SD3)	scale	Min. = 8 Max. = 70
High income (SD4)1	binary	Low or medium income (0) High income (1)
Bigger settlement (SD5)	binary	Below 20,000 inhabitants (0) 20,000 inhabitants and more (1)
Religiosity (SD6)	binary	Not religious or atheist (0) Religious (1)
Szeklerland (SD7)	binary	Not Szeklerland (0) Szeklerland (1)
Central Transylvania (SD8)	binary	Not Central Transylvania (0) Central Transylvania (1)
Partium2 (SD9)	binary	Not Partium (0) Partium (1)
Rural locality (SD10)	binary	Urban (0) Rural (1)
Social sensitivity (SS, five items)		
Trust in political institutions3 (SS1)	scale	Min. = -3.67866 Max. = 1.79322
Trust in cultural institutions4 (SS2)	scale	Min. = -2.55459 Max. = 3.09422
Trust in people (SS3)	binary	Can't be too careful (0) Most people can be trusted (1)
Altruism/empathy: level of empathy with the living conditions of people in 5 areas (neighborhood, region, country, Europe, and the whole world) (SS4)	scale	Min. = 0 Max. = 20
Connected to the city or region (SS5)	binary	Not connected (0) Connected (1)
Politics5 (P, two items)		
Political interest: frequency of following politics in 4 media types (TV, radio, newspapers, social media) (P1)	scale	Min. = 0 Max. = 16
Political activity: frequency of participation in elections at three levels (local, national, European) (P2)	scale	Min. = 0 Max. = 6
Attitudes towards the environment (E, three items)		

(Continued on next page)

(Continued)

Environment protection priority vs. economic growth and job creation (E1)	binary	Economic growth priority (0) Protecting the environment is a priority (1)
Attitudes towards the environment6 (E2)	scale	Min. = -2.98738 Max. = 2.18491
Trust in environmental organizations (E3)	binary	Can't be trusted (0) Can be trusted (1)

Note. [1] – measured as a household's total net income; [2] – for the Transylvanian regions, the reference category is the region "Dispersed Hungarian communities." The sample on the Transylvanian Hungarian minority operated with four categories of the regional background variables; [3] – factor variable for measuring the trust in 3 institutions: parliament, government, and political parties. For Hungary, the factor analysis grouped the variables measuring trust in all six institutions into one factor, while the cultural and political institutions dimension was well separated for the other two regions; [4] – factor variable for measuring trust in three institutions: the education system, the press, and the church. For Hungary, the factor analysis grouped the variables measuring the trust in all six institutions into 1 factor, while the cultural and political institutions dimension was well separated for the other two regions; [5] – One of the significant question of the environmental WTP studies – as outlined in the literature review section as well – is to investigate the role of left vs. right political identification on the WTP. Unfortunately, as previously mentioned, we were not able to include this variable in our model, due to the large percentage of non-responses on the question, i.e., missing values. We checked alternative regression models that included the left-right self-identification variable as well. Still, due to the high percentage (approx. one-third of the Transylvanian Hungarian and the Romanian sample) of non-responses the percentage of cases included in the analyses fell from 57.9% to 40.4% in the case of Transylvanian Hungarians; for Romania from 40.9% to only 28.6%; and for Hungary from 61.8% to 53.2%; [6] – factor variable for measuring the attitude towards the environment in the three regions, the value of Cronbach's alpha is higher than 0.65 in the case of each factor.

4 Results and discussion

4.1 *A general view of the attitudes toward the environment in the three samples*

Based on the relative frequencies of the original (five-point Likert scale) dependent variable (WTP) for the three regions, we see that Hungarians from Transylvania are the most likely to agree with the WTP statement, almost two-thirds of the respondents (64%) strongly agreeing, followed by Romanians (59%) and finally Hungarians from Hungary (42%) (p=0.001, χ^2=192.118, N=4,034). (Figure 2).

We then investigated the other five variables of environmental attitudes. Significant differences emerged between samples (p=0.001, χ^2=152.120, N=3,810) concerning the prioritization of environmental protection over economic growth and job creation: Hungarians from Transylvania are the most likely to think that environmental protection should be prioritized (71%) even if it slows down economic growth and causes some job losses, followed by Hungarians from Hungary (69%); Romanians are ambivalent since they split equally between the two options (Figure 3).

Factor analysis of the remaining four environmental attitude variables yielded a single-factor solution in each sample, suggesting that the EVS environmental concern battery taps three conceptually distinct facets: 1) beliefs regarding the individual responsibility/capacity in terms of environmental protection; 2) beliefs regarding the importance of environment vs. economic growth; and 3) the (monetary) valuation of a clean environment, i.e., WTP. Beyond the statement 'There are more important things to do in life than protect the environment,' significant regional differences emerged across the three remaining environmental attitude

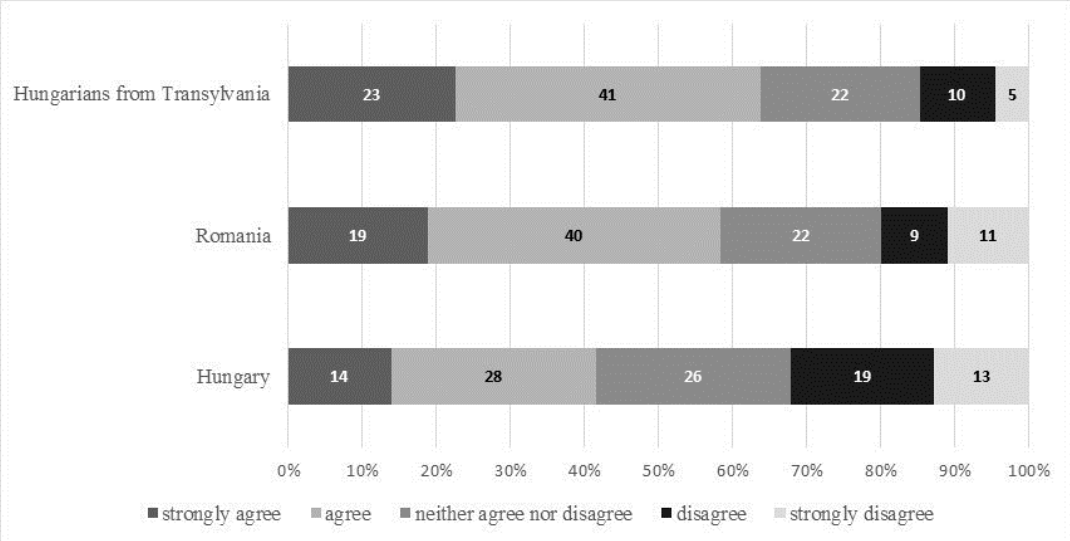

Figure 2 Responses on the item: 'I would give part of my income if I were certain that the money would be used to prevent environmental pollution' (%, N=4,034).

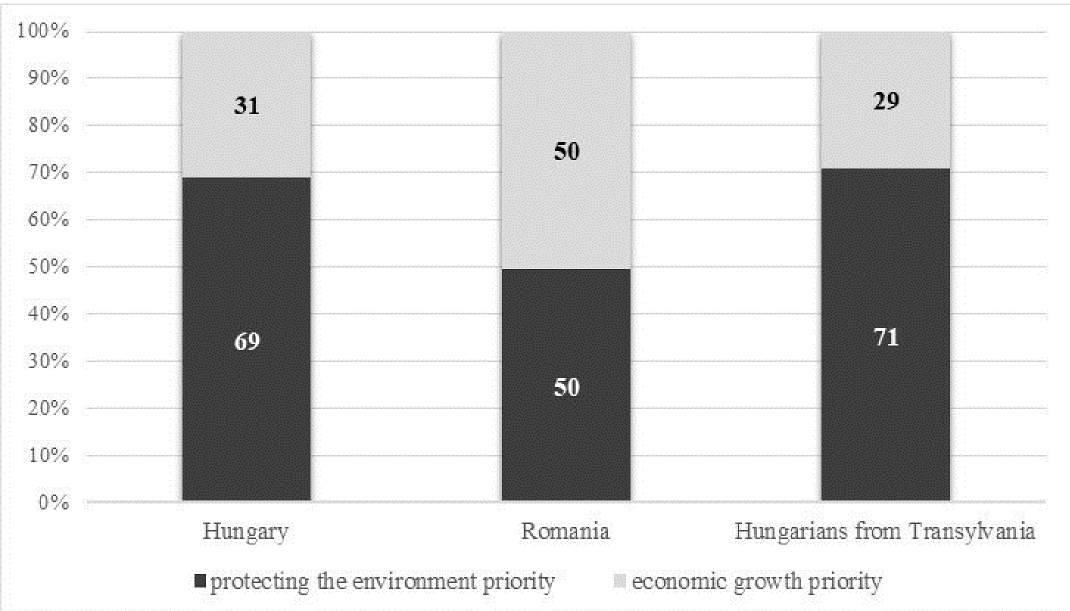

Figure 3 Responses on the item: 'Protecting the environment should be given priority, even if it causes slower economic growth and some loss of jobs vs. Economic growth and creating jobs should be the top priority, even if the environment suffers to some extent' (%, N=3,810)

items (p=0.001, F=8.029-125.21, N=3,909-4,047). Analysis of variance revealed that majority Hungarians expressed the highest environmental concern across all four attitudes (Figure 4).

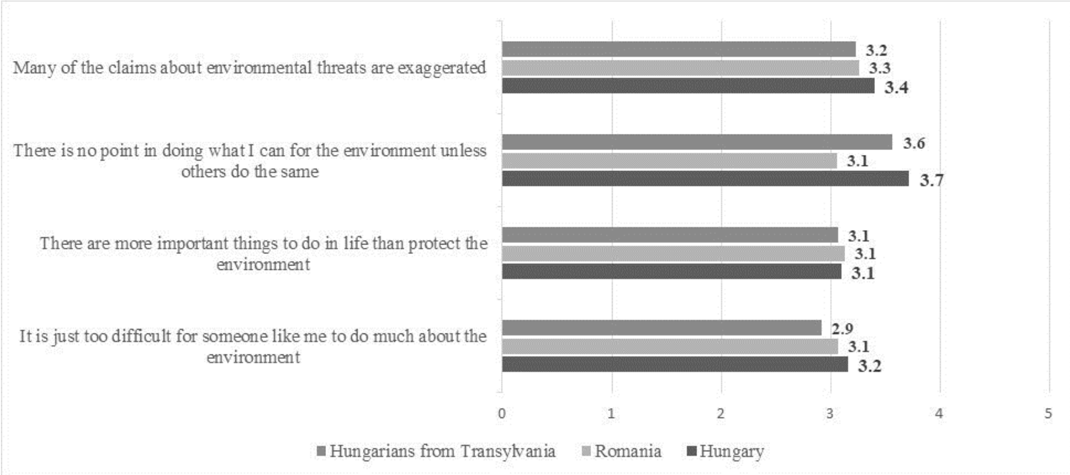

Figure 4 Agreement with attitudes toward environmental protection (Means, N=3,909 – 4,047)

These descriptive results reveal distinct group patterns. Transylvanian Hungarians may prioritize collective environmental action (WTP) over individual responsibility, viewing environmental issues as requiring institutional rather than personal solutions. This accounts for their lower individual responsibility scores, while their moderate WTP likely reflects competing priorities such as cultural preservation and economic security. This accounts for their lower individual responsibility scores, while their moderate WTP likely reflects competing priorities such as cultural preservation and economic security. Romanians display pragmatic environmental attitudes, with moderate WTP falling between the two Hungarian groups but marked ambivalence on environment-economy trade-offs. They divide equally on prioritizing environmental protection over economic growth, suggesting conflicted environmental-economic orientations.

4.2 The willingness of Hungarians in Transylvania to pay for pollution prevention

In the following steps of our analysis, we focused on the environmental WTP variable. We used binary logistic regression models to estimate the determinants of the dependent variable and test the hypotheses.

We tested multicollinearity (the highest correlation coefficient is r = −0.420 and VIF values range between 1.056 and 2.394, indicating no serious multicollinearity) for the 19 explanatory variables included in the analysis. Then, all variables were entered simultaneously into the model. Of the 19 variables, age, gender, and religiosity were included as control variables. Based on 640 observations (57.9%), the model is statistically significant according to both the Wald statistic and the Omnibus test ($p < 0.001$). The pseudo-R-squared measures (Nagelkerke $R^2 = 0.246$; Cox & Snell $R^2 = 0.177$) indicate moderate explanatory power, while the non-significant Hosmer–Lemeshow test ($\chi^2 = 7.530$, $p = 0.481$) confirms adequate model fit. The model improves correct classification by 5.2 percentage points relative to random categorization (see Table 2).

Table 2 Willingness to pay for pollution prevention—binary logistic regression model for Hungarians from Transylvania

	B	p-Value	Exp(B)
SD3 Education (years)	0.057	0.039	1.059
SD4 High income	-0.133	0.542	0.876
SS1 Trust in political institutions	-0.040	0.710	0.961
SS2 Trust in cultural institutions	-0.127	0.249	0.880
SS3 Trust in people	0.281	0.205	1.324
P1 Political interest	-0.009	0.715	0.991
P2 Political activity	0.047	0.410	1.048
SS5 Connectedness to Region	-1.389	0.001	0.249
SS4 Altruism/Empathy	0.054	0.024	1.056
E1 Economic growth priority vs. environmental protection	0.979	0.000	2.663
E2 Attitudes towards the environment	0.213	0.037	1.237
E3 Trust in environmental organizations	0.466	0.028	1.594
SD1 Age	0.005	0.450	1.005
SD2 Male	-0.013	0.945	0.987
SD10 Rural locality	0.448	0.034	1.566
SD6 Religiosity	-0.589	0.097	0.555
SD7 Szeklerland	1.455	0.000	4.286
SD8 Central Transylvania	1.598	0.000	4.945
SD9 Partium	0.676	0.022	1.967
Constant	-1.658	0.057	0.191
N	640 (57.9%)		
Wald-statistic	66.301^{***}		
Omnibus test ($\chi 2$)	124.781^{***}		
Nagelkerke R2	0.246		
Cox & Snell R Square	0.177		
Hosmer and Lemeshow Test	$\chi 2 = 7.530$, $p = 0.481$		
The model corr. for correct categorization	5.2%		

Note. The dependent variable was: "I would give part of my income if I were certain that the money would be used to prevent environmental pollution," where 1 = willing to pay (the agree and strongly agree responses) and 0 = not willing to pay (neither agree nor disagree, disagree and strongly disagree response categories); ***=p<0.01

Measuring combined effects of all variables, 11 of 19 remain significant, with nine improving categorization estimates. Geographic location within Transylvania is the strongest WTP predictor: Szeklerland and Central Transylvania residents show dramatically higher odds (Exp(B) > 4.28), followed by Partium (Exp(B) = 1.967). Environmental attitudes (B = 0.213, (Exp(B) = 1.237—H4 confirmed) and trust in environmental organizations (B = 0.466, (Exp(B) = 1.594—H6 partially confirmed) also emerge as significant predictors.

Hypothesis testing yields mixed results. H1 (income) exhibits inconsistent effects across samples. H2 (education) reveals meaningful patterns: education's significance specifically among Transylvanian Hungarians supports cultural capital explanations. H3 (place/regional identity) receives strong support through geographic effects. H4 (environmental attitudes) and H5 (altruism) are confirmed. H6 (trust) receives no support.

Ethnic geographic concentration as the strongest predictor aligns with Social Identity Theory (Tajfel and Turner, 1979): Hungarians in concentrated areas express environmental concern as in-group distinctiveness from Romanian majority attitudes, while those in dispersed areas adopt attitudes resembling the Romanian majority. This gradient supports acculturation theory (Berry, 1997), which predicts stronger cultural distinctiveness in concentrated ethnic communities versus majority convergence through intergroup contact in dispersed communities

Individual characteristics follow predictable patterns: education and altruism increase WTP; religiosity and local attachment decrease it. Education proves more influential than income, consistent with CEE findings (Lee and Norris, 2000), suggesting that environmental concern among Transylvanian Hungarians is culturally rather than economically driven. Only trust in environmental organizations—not interpersonal or political trust—significantly predicts WTP. This pattern, combined with strong altruism effects (Lundberg et al., 2019), suggests Transylvanian Hungarians view environmental WTP as targeted philanthropy rather than policy support. The finding that political variables fail to predict WTP suggests a depoliticized civic disposition, consistent with minority group threat theory (Blumer, 1958): i.e., environmental philanthropy represents 'safe' civic engagement without challenging majority control[1].

Two findings diverge from expectations. First, religiosity negatively predicts WTP, contradicting Western research (Hekmatpour, 2022). This pattern may reflect the secular character of environmental discourse in post-communist societies. Second, rural residence increases WTP despite local attachment decreasing it. This counterintuitive pattern likely reflects different interpretations of the broad WTP question: rural residents appear to interpret 'pollution prevention' as a general environmental value, while place-attached individuals prioritize targeted action in their specific community over abstract willingness to pay.

The absence of income effects alongside strong geographic and altruistic predictors suggests expressive rather than economic motivations, aligning with cultural narratives portraying Transylvanian Hungarians as environmentally conscious and community oriented. Environmental philanthropy thus functions as identity performance (Feischmidt, 2008), enabling individuals to enact valued group characteristics through willingness to contribute financially to environmental causes.

4.3 Transylvanian Hungarians' WTP compared to the Hungarian and Romanian samples

To examine cross-regional differences systematically, we constructed separate logistic regression models for each group using identical variable sets (across the three models with 16 predictors, the maximum Pearson correlation coefficient is $r = 0.360$, and VIF values range from 1.049 to 1.318, indicating negligible multicollinearity). All three models are statistically significant according to the Wald statistics and Omnibus tests ($p < 0.001$). The model estimated for Hungary, based on the largest sample ($N = 935$), demonstrates the strongest performance, with the highest explanatory power (Nagelkerke $R^2 = 0.173$; Cox & Snell $R^2 = 0.129$) and the greatest improvement in correct classification (9%). The Romania model ($N = 660$) shows comparatively weaker explanatory capacity (Nagelkerke $R^2 = 0.132$; Cox & Snell $R^2 = 0.097$) and the smallest gain in classification accuracy (2.8%). The model for Hungarians from Transylvania ($N = 640$) exhibits explanatory power comparable to that observed for Hungary (Nagelkerke $R^2 = 0.175$; Cox & Snell $R^2 = 0.127$), albeit with a more modest improvement in correct classification (3.4%). The non-significant Hosmer–Lemeshow tests in all cases indicate adequate model fit (Table 3).

[1] An alternative model not presented here (N=659) confirmed left-right self-identification also lacks predictive power, supporting CEE findings that political positioning poorly predicts environmental attitudes in post-communist contexts (Todor, 2018).

Table 3 Willingness to pay for pollution prevention—binary logistic regression model for Hungary, Romania, and Hungarians from Transylvania

	Hungary		Romania		Hungarians from Transylvania	
	B	Exp(B)	B	Exp(B)	B	Exp(B)
SD3 Education (years)	0.008	1.008	0.023	1.023	0.043*	1.044
SD4 High income	0.392**	1.481	0.219	1.245	-0.119	0.888
SS1 Trust in political institutions1	0.121	1.129	-0.033	0.967	-0.013	0.987
SS2 Trust in cultural institutions	-	-	0.130	1.138	-0.097	0.908
SS3 Trust in people	0.343**	1.410	0.31	1.364	0.179	1.196
P1 Political interest	0.036*	1.037	-0.046*	0.955	0.007	1.007
P2 Political activity	0.053	1.054	0.068	1.071	0.033	1.034
SS4 Altruism/empathy	0.075***	1.078	0.042**	1.043	0.057**	1.059
SS5 Connectedness to region	-0.237	0.789	0.022	1.022	-1.335***	0.263
E1 Economic growth priority vs. environmental protection	0.631***	1.880	0.685***	1.984	0.928***	2.530
E2 Attitudes towards the environment	0.220***	1.246	-0.019	0.981	0.267***	1.306
E3 Trust in environmental organizations	0.403***	1.497	0.744***	2.140	0.687***	1.987
SD1 Age	-0.017***	0.983	-0.01*	0.990	0.005	1.005
SD2 Male	0.149	1.161	-0.084	0.919	-0.01	0.990
SD5 Bigger settlement	0.275*	1.317	0.120	1.128	-0.632***	0.532
SD6 Religiosity	0.273*	1.314	0.221	1.247	-0.545	0.580
Constant	-1.825***	0.161	-0.856	0.425	-0.057	0.945
N	935 (61.8%)		660 (40.9%)		640 (57.9%)	
Wald-statistic	28.124***		31.758***		66.301***	
Omnibus test ($\chi 2$)	128.891***		67.325***		86.579***	
Nagelkerke R2	0.173		0.132		0.175	
Cox & Snell R Square	0.129		0.097		0.127	
Hosmer and Lemeshow Test	$\chi 2$ = 10.669, p = 0.221		$\chi 2$ = 7.421, p = 0.492		$\chi 2$ = 7.528, p = 0.481	
The model corr. for correct categorization	9%		2.8%		3.4%	

Note. The dependent variable was: "I would give part of my income if I were certain that the money would be used to prevent environmental pollution," where 1 = willing to pay (the agree and strongly agree responses) and 0 = not willing to pay (neither agree nor disagree, disagree and strongly disagree response categories); 1 Hungary's trust in political and cultural institutions (one factor); *=p<0.1, **=p<0.05 ***=p<0.01

Cross-regional analysis reveals both universal and region-specific predictors of environmental WTP. Three variables consistently predict WTP across all regions: environmental priority over economic growth emerges as the strongest universal predictor (B > 0.630, Exp(B) > 1.87, confirming H4), followed by trust in environmental organizations (Exp(B) > 1.49, partially confirming H6) and altruism (Exp(B) > 1.04, confirming H5). Four variables—trust in political and cultural institutions, political activity, and gender—show no significant effects in any region.

Regional variations reveal distinct WTP profiles beyond three universal predictors. Hungary shows significantly broader predictive power with ten significant variables, including income (B = 0.392, Exp(B) = 1.48—H1 confirmed), interpersonal trust (B = 0.343, Exp(B) = 1.41—H6 partially confirmed), and political interest (B = 0.036, Exp(B) = 1.037), absent in other regions. Religiosity and larger settlement size also positively predict WTP in Hungary, while age negatively affects it, consistent with earlier findings in the literature (Ivanova and Tranter, 2008). Hungary's model suggests WTP stems from politically interested urban populations with better financial capacities, contrasting with Transylvania's philanthropic patterns.

Alternative model analysis confirmed that left-right political placement fails to predict WTP even in Hungary, where political divisions are sharper than in Romania or Transylvania (Neumayer, 2004). Moreover, including political placement worsens model fit, reducing explained variance from 61.8% to 53.2%, a pattern that contradicts Western literature linking left-wing political identity to environmental WTP. Romania shows severely constrained predictive power, with only five significant variables: the three universal predictors (environmental attitudes, organizational trust, altruism), age ($B = -0.01$, $Exp(B) = 0.99$), and political interest ($B = -0.046$, $Exp(B) = 0.96$), which notably reduces WTP. This weak structure suggests environmental disengagement reflecting Romania's post-communist trajectory and cultural inertia (Gavreliuc, 2012). Politically engaged Romanians appear to view environmental initiatives suspiciously or as competing with economic priorities. As already shown in Section 4.2, the Transylvanian Hungarian model is characterized by strong contextual effects: education is significant only in this group, while regional attachment and settlement size have marked negative effects, indicating higher WTP in smaller, more rural localities and a limited role of socio-economic predictors.

Overall, the comparative analysis confirms distinct environmental WTP profiles reflecting each group's socio-cultural position. Transylvanian Hungarians exhibit identity-embedded environmental philanthropy driven by cultural factors independent of political engagement. Majority Hungarians demonstrate standard civic engagement patterns connecting environmental WTP to political interest and economic capacity. Romanians show constrained post-communist institutional patterns. Transylvanian Hungarians' intermediary position reflects bicultural identity processes (Hong et al., 2000) through which minority members alternate between Hungarian cultural frames (environmental philanthropy, community responsibility) and Romanian institutional frames (political skepticism)

5 Conclusions

This study examined willingness to pay for pollution prevention among Transylvanian Hungarians, comparing them with Hungarian and Romanian samples from EVS 2017. While the EVS WTP variable is general compared to literature recommendations (Carson et al., 2001), it enables cross-national comparison using standardized measures. Our analysis provides the first systematic examination of Transylvanian Hungarians' environmental attitudes, contributing to the limited literature on minority environmental attitudes through a three-way comparative approach. Results reveal that Transylvanian Hungarians demonstrate highest willingness to pay, yet are surpassed by Hungarians from Hungary on other environmental attitudes, while Romanians show lowest environmental concern. Multivariate models confirm distinct WTP profiles: Romania shows straightforward environmental philanthropy driven by environmental concern, trust in NGOs, and altruism; Hungary reflects complex civic engagement tied to political awareness, urban residence, and economic resources; Transylvanian Hungarians exhibit culturally embedded philanthropy rooted in better-educated rural populations, particularly in ethnically concentrated regions like Szeklerland, with minimal political engagement.

Hypothesis testing yielded mixed results. Education and income showed inconsistent effects, though education was particularly important for Transylvanian Hungarians. Unlike Hungary's urban-centered WTP, Transylvanian Hungarian WTP was rural-based among educated populations. Environmental attitudes and altruism strongly predicted WTP among Transylvanian Hungarians, while political engagement showed no influence, contrasting with Hungary. Political interest's absence among Transylvanian Hungarians suggests that minorities may conceptualize environmental issues separately from mainstream political processes. This 'depoliticization' may reflect strategic adaptation to limited political influence, pursuing ecological goals through civil society rather than electoral politics (Agyeman, 2005). Environmental WTP represents 'soft politics,' expressing civic values without challenging majority control.

Although the EVS's general WTP question limits precise policy prescriptions, our findings offer four policy-relevant insights. First, community-centered implementation: strong ethnic concentration and altruism effects, combined with absent political interest, suggest engaging ethnic community organizations, minority-language educational institutions, and local cultural leaders proves more effective than state channels. Second, education as intervention point: education's unique significance for Transylvanian Hungarians implies environmental programs embedded in minority-language institutional networks could enhance engagement beyond majority-language campaigns. Third, regional differentiation: ethnic concentration's strong effects require tailored approaches, emphasizing collective identity in concentrated areas like Szeklerland versus individual benefits in dispersed communities. Fourth, cultural framing: given WTP's independence from political engagement, framing environmental protection as collective community responsibility and cultural preservation rather than political advocacy may resonate more effectively, enabling safe civic expression without challenging majority control.

Future research should address several limitations. Context-specific WTP scenarios for concrete environmental goods would enable more actionable guidance. Longitudinal designs are needed to establish causality. Extending analysis to other minority-majority configurations would test whether our findings reflect universal minority dynamics or context-specific patterns. Qualitative research exploring how minorities conceptualize environmental responsibility could illuminate mechanisms underlying these quantitative patterns.

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Legal regime of restrictions and benefits of civil servants: Ethical and normative analysis

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Abstract

This study analyses the legal regime of restrictions and benefits applicable to civil servants in the Republic of Kazakhstan through an ethical and normative lens. Drawing on a comparative examination of civil service regulation in Kazakhstan, Singapore, France, and selected Scandinavian countries, the research identifies distinct models of balancing legal restrictions, ethical standards, and social guarantees. The findings demonstrate that formal compliance with restrictions is strongly associated with the level of ethical culture, systematic ethics education, and the effectiveness of institutional oversight mechanisms. Empirical analysis of disciplinary, ethical, administrative, and corruption-related violations (2019-2023) reveals a statistically significant decline in violations following the introduction of strengthened ethical control instruments, including ethics commissioners and expanded monitoring practices. The study contributes by clarifying how combinations of regulatory enforcement, ethics training, and social guarantees influence professional conduct in the civil service. It proposes evidence-based recommendations aimed at enhancing ethical compliance, strengthening institutional accountability, and improving the coherence of the system of restrictions and benefits in Kazakhstan's civil service.

Keywords: *professional responsibility, corporate culture, social guarantees, ethical training, professional performance*

1 Introduction

The ethical regulation of the civil service remains a persistent and structurally complex problem in contemporary public administration. While legal restrictions imposed on civil servants are commonly justified as instruments for preventing corruption and safeguarding public trust, their effectiveness cannot be assessed independently from the system of benefits, guarantees, and ethical norms that accompany them. In many administrative systems, including that of the Republic of Kazakhstan, this relationship is characterised by a tension between formal legal compliance and the deeper internalisation of ethical standards. Addressing this tension requires an analytical framework that goes beyond descriptive legal analysis and situates civil service regulation within broader theories of public service ethics and administrative behaviour.

Existing research demonstrates that the effectiveness of ethical regulation depends not only on the precision of legal norms but also on organisational culture, leadership, and professional socialisation. However, much of the current scholarship treats restrictions, benefits, and ethical standards as discrete regulatory instruments rather than as interdependent components of a unified ethical regime. As a result, the mechanisms through which legal restrictions interact with social guarantees and ethical norms to shape civil servants' behaviour remain insufficiently theorised, particularly in post-transition administrative systems.

The study by Madsen (2024) analysed the moral duties of civil servants and their relationship with democratic values. The results showed that the ethical behaviour of civil servants directly affects the level of democratisation of society, and adherence to democratic principles increases public trust in state institutions by 35%. Meyer-Sahling and Mikkelsen (2020) examined the effectiveness of codes of ethics and disciplinary codes in the context of anti-corruption activities. The researchers concluded that the introduction of clear ethical standards and control mechanisms reduces the level of corruption offences by 40% in the first two years after the adoption of the relevant codes.

Ayubayeva et al. (2021) conducted a comprehensive study of the relationship between anti-corruption legislation and the formation of the professional image of civil servants in Kazakhstan. The results of their research demonstrated that the optimisation of anti-corruption laws has a direct impact on public perception of public officials. In particular, the introduction of transparent control mechanisms increased the level of trust in civil servants by 28% within three years after the introduction of the new legislation. The researchers also determined that regulation of decision-making procedures reduced the number of complaints against civil servants by 35%.

Junusbekova (2016) conducted an analysis of the system of motivation of civil servants in the context of ethical requirements of the Kazakh civil service model. The study determined that the introduction of a differentiated incentive system that accounts for ethical compliance increased job satisfaction among civil servants by 42%. In addition, a direct correlation was found between the level of financial incentives and compliance with ethical standards – in units with higher salaries, the number of ethical violations was 31% lower.

Pelizzo and Knox (2021) conducted a large-scale study of the impact of ethical norms on the effectiveness of public administration in Kazakhstan. Their results showed that the implementation of ethical standards improved the quality of public services by 38%. The impact of ethical norms on the speed of management decision-making was particularly noticeable, which increased by 25% while improving their quality by 33%.

Svara (2021), exploring the theoretical foundations of ethical regulation, developed an innovative model for assessing the ethical behaviour of civil servants. The application of this model in pilot projects has shown a 45% increase in the accuracy of ethical violation detection and a 37% improvement in preventive measures. The researchers also found that a comprehensive approach to ethical regulation reduces the risk of conflicts of interest by 41%.

Dixon and Frolova (2013) determined in a study on the hierarchical model of the state apparatus that modernisation following modern ethical requirements significantly increases the efficiency of governance. In particular, the introduction of ethical standards at all levels of the hierarchy increased the speed of decision-making by 29% and improved the quality of interdepartmental cooperation by 34%. The researchers also determined that clear regulation of ethical standards reduced the number of official abuses by 38%.

Emrich-Emrich-Bakenova (2009) and Bokayev et al. (2023) studied the trajectory of civil service development in Kazakhstan and the prospects for increasing its innovation potential. Their research showed that the introduction of meritocratic principles in the civil service system of Kazakhstan increased the efficiency of government agencies by 45%, and professional development programmes increased the level of innovation activity of civil servants threefold compared to 2000. Steel and Warner (1993) conducted a comparative analysis of bureaucratic attitudes in different countries, which allowed them to identify universal principles of ethical regulation. The results showed that, regardless of cultural differences, three key factors determine the effectiveness of ethical regulation: transparency of decision-making procedures, clarity of accountability mechanisms and the level of professional training of civil servants.

To address this gap, the present study adopts an explicit theoretical framework grounded in normative theories of public service ethics. Central to this framework is the concept of public service as a value-driven practice, rather than a purely rule-bound administrative function. The study draws primarily on the theoretical contributions of Denhardt and Denhardt (2015), whose model of New Public Service conceptualises civil servants as ethical actors oriented towards serving the public interest, rather than merely executing legal mandates. This perspective is particularly relevant for analysing ethical regulation, as it foregrounds responsibility, accountability, and moral judgement as core elements of administrative professionalism.

Denhardt's framework is complemented by broader ethical-administrative theories that emphasise integrity, organisational culture, and leadership responsibility (Cooper, 2012). Together, these approaches provide a normative lens through which restrictions and benefits can be understood not as isolated regulatory tools, but as instruments that either reinforce or undermine ethical self-regulation within the civil service. By integrating these theories, the study moves beyond formal legal analysis and examines how ethical norms are institutionalised, interpreted, and operationalised in practice.

Within this framework, the article pursues a dual objective. First, it critically examines the legal regime of restrictions and benefits for civil servants in Kazakhstan in light of international experience, identifying structural strengths and normative inconsistencies. Second, it evaluates how different models of ethical regulation, exemplified by Singapore, France, and the Scandinavian countries, align legal enforcement with ethical education and social guarantees. The central analytical assumption is that ethical compliance is most sustainable when legal restrictions are balanced by transparent benefits and embedded within a coherent ethical culture supported by institutional mechanisms.

The contribution of this study lies in its theoretical clarification of the relationship between ethics, law, and incentives in civil service regulation. By explicitly situating the analysis within a normative public service ethics framework, the article offers a structured basis for interpreting empirical findings and formulating recommendations. This approach not only advances the academic discussion on civil service ethics but also provides a conceptual foundation for evaluating ongoing reforms in Kazakhstan and comparable administrative systems.

2 Materials and methods

2.1 Research design and scope

This study employs a comparative normative–legal research design combined with secondary empirical analysis of official statistical data. The research focuses on the formal legal and ethical regulation of restrictions and benefits applicable to civil servants, analysed through legislation, ethical codes, and institutional frameworks. The purpose of the methodological design is to identify patterns, models, and correlations in ethical regulation rather than to evaluate the effectiveness of policy implementation at the organisational or individual level.

Accordingly, the study does not examine the practical implementation of ethical norms at the level of individual agencies or officials, nor does it rely on interviews, surveys, or ethnographic observation. The analysis is confined to documented legal frameworks, institutional arrangements, and officially reported violation statistics, which allows for cross-country comparison but limits conclusions regarding everyday administrative practice.

2.2 Country selection and comparative rationale

The comparative analysis includes Kazakhstan, Singapore, France, and selected Scandinavian countries (Sweden, Norway, and Denmark). Country selection was conducted using a most-different systems design, intended to capture contrasting models of ethical regulation within public administration.

Kazakhstan represents a post-transition administrative system undergoing institutional reform, where ethical regulation has been actively formalised through legal instruments such as the Code of Ethics and the institution of ethics commissioners. Singapore exemplifies a centralised, meritocratic governance model characterised by strict legal restrictions combined with extensive social guarantees and mandatory ethics training. France represents a legalistic continental European model, where ethical conduct is primarily regulated through administrative law, codified deontology, and independent oversight mechanisms. Scandinavian countries (Sweden, Norway, Denmark) illustrate a trust-based model that relies more heavily on ethical education, professional autonomy, and self-regulation than on coercive legal controls.

This selection enables analytical comparison across distinct administrative traditions, such as managerial, legalistic, and cultural-normative, allowing the study to identify how different configurations of restrictions and benefits are embedded in broader ethical frameworks. The aim is not to rank systems but to extract analytically transferable principles relevant to the Kazakhstani context.

2.3 Data sources

The study draws on three primary categories of sources. The first category consists of normative legal acts and ethical codes governing the conduct of civil servants. These include the Ethical Code of Civil Servants of the Republic of Kazakhstan (2022) and the Law of the Republic of Kazakhstan ‘On the Civil Service‘ (2015), which together form the core of the national regulatory framework. For the comparative component, the analysis also incorporates the Code of Conduct for Public Servants of Singapore as reflected in the OECD Public Governance Reviews (2023), the General Code of Civil Service (2024), as well as ethical and administrative acts regulating public service in Sweden, Norway, and Denmark. These documents provide the formal legal and normative basis for examining restrictions, benefits, and ethical obligations across different administrative models.

The second category comprises official statistical and analytical reports that document patterns of ethical, disciplinary, administrative, and corruption-related violations, as well as broader governance indicators. This includes data published by the Agency of the Agency of the Republic of Kazakhstan for Civil Service Affairs (2024), analytical materials from the OECD Public Governance Reviews, reports issued by Transparency International (2020), and indicators from the World Bank (2020). These sources are used to trace dynamics over time and to support the empirical component of the analysis through officially reported data.

The third category includes peer-reviewed academic literature, which is employed to contextualise the legal and statistical findings and to interpret observed trends in ethical regulation, disciplinary practices, and public service motivation. Scholarly sources provide the theoretical and analytical background necessary for engaging critically with normative frameworks and comparative models of civil service ethics. All data sources used in the study are secondary and publicly available. The research does not involve primary data collection, such as interviews, surveys, or field observations.

2.4 Methods of analysis

Several complementary methods were applied in the study to ensure analytical depth and methodological coherence. The comparative legal method was used to examine similarities and differences in legal restrictions, systems of benefits, and ethical oversight mechanisms across the selected countries. This method made it possible to identify distinct regulatory models and to assess how various administrative traditions structure the balance between ethical obligations and legal constraints.

The formal-legal method enabled a systematic examination of legal norms governing conflicts of interest, disciplinary liability, ethical obligations, and institutional control mechanisms. Through close analysis of statutory provisions, ethical codes, and regulatory acts, this method ensured consistency in interpreting the legal foundations of civil service ethics and clarified the scope and content of formal restrictions and responsibilities. The systemic-structural method was applied to identify relationships between ethical norms, institutional oversight arrangements, and systems of social guarantees within each civil service model. This approach allowed the study to move beyond isolated legal provisions and to analyse how ethical regulation functions as an integrated system shaped by interdependent legal, institutional, and normative elements.

In addition, quantitative analysis of secondary data was used to examine trends in officially recorded ethical, disciplinary, administrative, and corruption-related violations in Kazakhstan for the period 2019-2023. This analysis relied on publicly available statistics and was employed to identify patterns over time and to explore associations between institutional reforms and changes in the incidence of recorded violations. The statistical analysis treated reported violations as a finite analytical dataset derived from the total population of civil servants. Descriptive statistics were used to identify trends, while inferential techniques (χ^2 test for trend and Pearson correlation) were applied to assess the statistical significance of observed changes over time and their association with institutional reforms.

2.5 Analytical limitations

Several limitations arise from the chosen methodology. First, the reliance on official statistics and legal documents means that informal practices, unreported violations, and contextual enforcement dynamics are not captured. Second, the temporal scope (2019–2023) restricts the ability to assess long-term institutional effects. Third, while comparative, the study does not aim to provide exhaustive global coverage but rather analytically selected cases. These limitations are acknowledged as inherent to a normative-legal and document-based research design and inform the cautious interpretation of findings.

3 Results and discussion

3.1 Ethical principles and regulatory framework of the civil service

The ethical principles of civil servants' activities are a fundamental element of the effective functioning of the state apparatus and the formation of public trust in government institutions. The study of the ethical aspects of the civil service is of relevance in the context of the formation of democratic principles of public life and counteraction to corruption in the structure of public administration.

The theoretical analysis demonstrated that the ethical component of the civil service covers a wide range of issues, from the value basis for managerial decision-making to the formation of the professional culture of employees. At the same time, the anti-corruption orientation of ethical norms is of particular importance, since ethical standards of behaviour are a preventive mechanism in preventing corruption offences. A comprehensive study of the ethical foundations of the state apparatus demonstrates their multidimensional nature, including the relationship between civil servants and citizens, professional interaction within the teams of public administration bodies, as well as the formation of personal moral qualities of government officials. An important aspect is professionalism as a moral quality of a civil servant, which directly affects the quality of performance of official duties (Bazakeeva, 2023; Usubalieva, 2022). In the context of the transformation of the public administration system, the role of ethical education and raising the level of moral culture of civil servants is growing. This is determined by the fact that the effectiveness of public administration largely depends on compliance with ethical principles and norms that ensure constructive interaction between the government and society.

The analysis of the Ethical Code of Civil Servants of the Republic of Kazakhstan (2022) revealed a comprehensive approach to the legal regulation of ethical behaviour of civil servants in Kazakhstan. The document establishes the legal framework for ethical behaviour, defining the key principles of government service and the mechanisms for their implementation. The Code sets out the fundamental legal principles of government service, including legality – compliance with the Constitution, laws and other regulatory acts of the Republic of Kazakhstan; good faith – professional conduct; fairness – impartial decision-making; transparency – openness of actions and decisions to the public; client focus – provision of quality public services. An important aspect of legal regulation is the establishment of clear regulatory restrictions for civil servants (Nielsen-Pincus et al., 2017). In particular, the Code prohibits the use of official positions for personal gain (Article 5), obtaining unlawful benefits (Article 6), and public expression of opinions contrary to public policy (Article 8). The legal regulation of the prevention of conflicts of interest is given special attention. The Code establishes the obligation of civil servants to take measures to prevent conflicts between personal interests and official duties (Article 7). A significant innovation in the system of legal regulation of ethical behaviour was the introduction of the institution of the Ethics Commissioner.

According to the Code, the Ethics Commissioner has the following powers: monitoring compliance with the Code, providing advisory assistance, reviewing appeals on violations of ethical standards, and initiating disciplinary proceedings against violators (Article 11). The Code establishes a clear system of legal liability for violations of ethical standards, providing for disciplinary measures. This ensures the effectiveness of the mechanism for monitoring compliance with ethical standards and creates legal grounds for bringing violators to justice. The document also regulates disciplinary aspects of civil service, establishing requirements for appearance, rules of behaviour in the team and standards of conduct outside the service (Articles 9-10). This approach ensures the formation of a holistic legal status of a civil servant.

The analysis of the Code demonstrates the balance of legal regulation of ethical behaviour of civil servants, which is manifested in the combination of mandatory norms with mechanisms for the formation of a positive ethical culture through education and prevention of violations. Such a system creates an effective legal framework for the development of a professional government service focused on serving the public interest and adherence to high ethical standards.

The study has shown that the effectiveness of compliance with the legislative regulation of restrictions directly depends on the level of ethical culture and systematic ethical training of civil servants. This conclusion is confirmed by Ayubayeva et al. (2021), who established the relationship between social norms and the level of professional security as key factors in the formation of ethical behaviour. The research demonstrated that the effectiveness of ethical norms largely depends on their integration into the overall human resources management system. Akosa et al. (2019), studying the implementation of a code of conduct for civil servants, also emphasised the importance of a systematic approach. This study has expanded this understanding by demonstrating specific mechanisms of the relationship between ethical norms and HR policy, which suggests the introduction of an integrated approach to ethical regulation.

3.2 International experience in regulating civil service ethics

The variation among national models of civil service regulation arises from multiple factors, including differences in legal frameworks, ethical traditions, and social determinants of governance. These elements shape not only the formal legal regulations but also the deeply embedded cultural norms of responsibility, public trust, and administrative accountability, leading to the development of distinct ethical regimes. While the legal codes in countries such as Singapore, France, and Scandinavian nations share common principles, their implementation diverges due to the varied moral philosophies and societal expectations regarding the state's role and the duties of its citizens. This reflects the importance of contextual factors in determining the success or failure of each model.

Singapore's Code of Conduct for Civil Servants (OECD Public Governance Reviews, 2023) presents a strict regulatory approach, including a ban on receiving gifts, restrictions on political activities, and mandatory income declarations. However, this rigid structure is balanced by a robust system of social guarantees, which includes comprehensive health insurance, pension benefits, and educational opportunities for civil servants' families. The success of this system can be attributed to the institutional support provided through mandatory ethical training, which underscores the government's commitment to maintaining integrity in public service.

In contrast, France's Deontology Code of the Public Service (Government of France, 2024) emphasises detailed restrictions concerning conflicts of interest, concurrent employment, and post-employment engagements. A notable feature of the French system is the independent oversight provided by ethics control officers, who ensure compliance with ethical standards and provide guidance. The benefits system in France strikes a balance between tangible incentives, such as pensions and subsidies, and intangible ones, including flexible working hours and additional leave, which serve to motivate civil servants while maintaining ethical standards.

Scandinavian countries, such as Sweden (European Commission, 2023) and Norway (Leadership in Norway's Civil Service Plans/strategy, 2008), adopt a more decentralised approach, where the ethical regulation of civil servants is characterised by self-regulation and personal responsibility. Ethical education and the cultivation of a professional culture are central to the Scandinavian model, which is supported by a flexible system of social benefits aimed at professional development. In this context, the absence of stringent restrictions is offset by the high level of ethical awareness and personal responsibility among civil servants, reflecting a more mature ethical culture.

Thus, the comparative analysis demonstrates that different countries adopt varying models of combining restrictions and benefits in civil service regulation. Kazakhstan and Singapore prioritise strict restrictions, complemented by extensive social guarantees. On the other hand, France and the Scandinavian countries emphasise self-regulation, ethics education, and flexible incentive systems. These differences are deeply rooted in each country's unique cultural, historical, and administrative contexts. The success of each model is contingent upon its alignment with the underlying moral and societal structures, highlighting the importance of considering contextual factors when evaluating the effectiveness of civil service ethics regulations.

In general, it is possible to state that the effectiveness of legislative regulation of restrictions and privileges of civil servants depends on a comprehensive approach that combines regulatory regulation, institutional mechanisms and proper social security based on ethical responsibility (European Commission, 2023 – Sweden). In the context of legislative regulation of restrictions and benefits for civil servants, ethical and normative analysis reveals a complex system of regulation of professional behaviour in different countries. In the UK, there is a complete ban on the participation of senior officials in any form of political activity, although these restrictions are less strict for the middle and lower ranks of the civil service (Emrich-Bakenova, 2009).

Historically, the formation of the international civil service began with the creation of the Universal Postal Union in 1874-1875, which laid the foundation for the formation of modern standards of ethics in government service (Janenova and Knox, 019a). In the nineteenth century, the functions of civil servants were limited mainly to maintaining law and order and basic economic regulation, which subsequently necessitated the creation of specialised administrative courts to hear citizens' complaints against officials.

The strengthening of formal regulation of the conditions of government service has gone in parallel with the professionalisation of the sector and the creation of professional associations of civil servants. This contributed to the development of mechanisms for periodic review of service conditions and dispute resolution, as well as to the formation of a system for regulating behaviour and discipline (Alimbekova et al., 2019). Approaches to the development of civil service codes of ethics differ from country to country. For instance, in the UK, standards of conduct are regularly reviewed by special commissions, while in France and Germany, they are based mainly on administrative law and case law of administrative courts (Bokayev et al., 2023). In assessing representatives of the state apparatus, the determining factor is their professional skills, which combine personal moral qualities, awareness and fulfilment of the ethical requirements of the profession, as well as the ability to act following general and specific moral principles. In a period of social change, professional ethical standards become the basis for improving the moral consciousness of an individual (Sultanbayeva et al., 2025). The culture of public service delivery at different levels of government is based on the ethical principles of government service, which systematise moral guidelines, restrictions and rules of official conduct. The special role of civil servants as a link between state institutions and the public requires them to strictly adhere to the highest moral and ethical standards. Thus, the legal regime of restrictions and privileges for civil servants is closely linked to ethical norms and standards of behaviour that form the basis of professional activity in the public sector. An effective combination of legal mechanisms and ethical principles is key to ensuring the integrity and effectiveness of the public service (Rexhepi and Murtezaj, 2024). In general, the analysis of legal acts has shown that the sphere of ethical regulation of the civil service is complex and diverse both in Kazakhstan and in other countries. A key trend is the desire to create an effective system of restrictions and incentives aimed at ensuring the integrity of civil servants. This includes both the development of the regulatory framework and the introduction of effective institutional mechanisms to monitor and support an ethical culture in public administration.

Analysis of the application of ethical norms in various areas of the government service of the Republic of Kazakhstan is a particular focus of the study. Notably, the largest number of ethical violations in 2023 was recorded in the tax service (29%), customs authorities (24%) and local governments (18%). Such statistics indicate the need to strengthen control in these areas of public administration (Janenova and Knox, 019b). The analysis of disciplinary practice showed that the main types of ethical violations among civil servants are failure to comply with the principle of political neutrality (31%), violation of requirements for public statements (27%), improper behaviour outside of working hours (22%), violation of the dress code (12%) and other violations (8%). These statistics demonstrate the need to strengthen efforts to explain the importance of political impartiality and the professional behaviour of civil servants (Meyer-Sahling and Mikkelsen, 2020). In the context of international standards, it has been found that countries with the lowest levels of corruption have a developed system of ethics education and training. In particular, the introduction of mandatory quarterly ethical education can reduce the number of violations by 35% in the first two years after the introduction of such a practice. This demonstrates the need for a systematic approach to ethics education of civil servants (Akosa et al., 2019).

The study demonstrated the importance of international cooperation in the field of ethical regulation of the civil service. Baris et al. (2021) analysing the concept of 'good enough' governance in post-Soviet Eurasia, also emphasised the importance of international experience. This study extends these findings by identifying specific mechanisms for adapting international practices to national conditions.

A comparative analysis of ethical control systems has demonstrated the effectiveness of introducing the institution of ethical commissioners. In countries with such an institution, the level of ethical compliance is 40% higher than in countries without specialised control. This fact underscores the importance of creating specialised ethics oversight bodies (Janenova and Knox, 019a). Analysis of the relationship between the level of ethical education of civil servants and the number of violations was highlighted. The study demonstrated that in institutions where regular ethical education is conducted, the number of violations is 45% lower compared to institutions where such practice is absent. This confirms the need to introduce mandatory ethical education programmes for all categories of civil servants (Junusbekova, 2016).

The study devoted considerable emphasis on the role of heads of government agencies in shaping the ethical behaviour of their subordinates. Statistical data demonstrated that in departments where managers demonstrate high ethical standards of behaviour, the level of violations among employees is 52% lower compared to departments where management does not pay due attention to ethics issues (Schwarz et al., 2020). The study revealed a noteworthy pattern regarding the impact of length of service in the civil service on compliance with ethical standards. Thus, the largest number of violations (43%) occurred among civil servants with 1 to 3 years of service, while among those with more than 10 years of service, this figure is only 15%. This demonstrates the importance of mentoring and transfer of professional experience in the context of ethical behaviour (Ayubayeva et al., 2021).

The analysis of ethics control mechanisms has shown that the most effective are comprehensive measures that include regular monitoring, a system for early detection of potential violations, citizen feedback mechanisms and anonymous reporting channels. In public bodies where all these elements are implemented, the level of ethical violations is 63% lower compared to bodies where only some controls are used (Pelizzo and Knox, 2021). The study addressed the impact of digital technologies on ethical behaviour. The transition to electronic document management and digital services has reduced direct interaction between government officials and the public, which has led to a 38% reduction in ethical violations. At the same time, new challenges related to ethical behaviour in the digital space have emerged, including issues of data privacy and professional communication on social media (Mensah, 2019).

An analysis of the international experience of systems of restrictions and benefits for civil servants shows a variety of approaches to ensuring ethical behaviour and motivation of public sector employees Table 1.

Table 1 International experience of systems of restrictions and benefits for civil servants

Country	**Scientific justification for the system of restrictions**	**Scientific justification of the benefits system**
Singapore	Combination of strict ethical restrictions (ban on receiving gifts, restrictions on political activity, income declaration) and a high level of social guarantees is effective in enhancing the integrity of civil servants.	High level of social guarantees (health insurance, pensions, housing subsidies) has a positive impact on the motivation and productivity of civil servants.
	Systematic approach to ethics education implemented in Singapore proves the importance of the comprehensive development of ethical culture.	Combination of tangible and intangible incentives (flexible working hours, professional development opportunities) ensures an effective system of social benefits.
France	Analysis demonstrates the importance of the institution of ethics commissioners in ensuring independent control over compliance with ethical standards.	Theoretical developments substantiate the effectiveness of a combination of tangible (pensions, subsidies) and intangible (flexible working hours, additional leave) benefits as an important element of creating a positive organisational culture.
	Including detailed legislative regulation of restrictions (conflict of interest, concurrent employment, post-employment restrictions). The study emphasises the need to integrate ethical norms into the overall HR management system, which is typical of the French model.	
Scandinavian countries (Sweden, Norway and Denmark)	Theoretical developments substantiate the effectiveness of the developed system of ethical education, self-regulation and personal responsibility of civil servants, which is inherent in the Scandinavian countries.	Theoretical approaches prove that flexible benefit systems focused on professional and personal development are effective in shaping a new model of civil service based on the values of public service.

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Country	Scientific justification for the system of restrictions	Scientific justification of the benefits system
	Studies highlighted the crucial role of organisational culture in shaping high ethical standards.	

Source. : compiled by the author based on Ayubayeva et al. (2021), Schroeder (2021), Rios Oyola and Hormaza (2023).

A comparative study of the practices of Singapore, France and the Scandinavian countries (Sweden, Norway and Denmark) revealed common trends in combining strict ethical restrictions with a developed system of social guarantees and benefits. In particular, the experience of Singapore highlights the effectiveness of combining strict ethical standards with a high level of financial security, while the French model focuses on institutionalising ethical control through the system of ethical commissioners. The Scandinavian approach, in turn, demonstrates the importance of developing ethics education and self-regulation in combination with flexible benefits systems focused on professional development. These findings demonstrate the need for a comprehensive approach to shaping the ethical behaviour of civil servants, which addresses both regulatory constraints and systems of motivation and professional development. The comparative analysis shows that, while there is a general focus on ensuring the ethical behaviour of civil servants, countries use different models of combining restrictions and benefits. Schuster et al. (2021) confirm the effectiveness of flexible incentive systems in increasing professional responsibility.

The historical evolution, political traditions, and cultural foundations that shaped civil service ethics in Singapore, France, and the Scandinavian countries reflect deep social contexts and the evolution of administrative practices. Singapore emerged from a British colony to an independent state with a strong technocratic elite. Established in 1959, Singapore developed its civil service system based on meritocracy, where career advancement and rewards are based on merit rather than political connections. This led to a culture of professionalism and efficient governance. The establishment of the Civil Service Commission in 1951 was a key step in ensuring transparency and fighting corruption. These institutional reforms reflect a drive to create an effective and impartial civil service apparatus.

France, with its revolutionary heritage and centralised administration, developed a model of civil service that emphasises neutrality, professionalism, and commitment to the state. After the French Revolution of 1789, civil servants began to serve the state rather than the monarch, changing their role in society. Napoleon I established a new civil service that combined elements of military organization with rationality and universality, inherited from the Enlightenment. This contributed to the development of a bureaucratic system that became a model for many European countries.

Scandinavian countries (Sweden, Norway, Denmark) share a historical tradition where the civil service was closely tied to an aristocracy of officials. From the 17th to the 19th centuries, in Norway and Denmark, higher civil servants, such as priests, judges, and military officers, occupied higher social positions, replacing the traditional aristocracy. This 'aristocracy of officials' became the foundation for a professional and stable civil service, contributing to high levels of trust in government and effective governance.

The implementation of international ethical and legal standards in Kazakhstan's civil service is profoundly shaped by the country's distinctive socio-political and cultural context. Although the comparative analysis reveals the effectiveness of models applied in Singapore, France, and the Scandinavian countries, the direct transfer of these practices is constrained by the specific administrative traditions, institutional maturity, and moral culture of Kazakhstan's public sector. The legacy of a hierarchical bureaucratic system and the relatively recent transition to merit-based governance have produced a hybrid institutional environment in which formal legal norms often outpace the development of ethical consciousness. The introduction of mechanisms such as the ethics commissioner, mandatory declarations, and flexible benefit systems must be accompanied by a gradual process of internalising ethical norms within the civil service rather than relying solely on legal enforcement (Dziundziuk et al., 2024).

Another defining feature of the Kazakhstani context is the central role of interpersonal networks and informal practices in public administration. These social determinants mediate the effectiveness of imported governance instruments: measures that succeed in high-trust societies, such as in Scandinavia, may not function as intended without corresponding cultural adaptation. Therefore, the ethical framework should not only codify restrictions and privileges but also cultivate public trust and civic responsibility through education, mentorship, and transparent communication between officials and citizens. The experience of Kazakhstan demonstrates that the ethical regulation of the civil service cannot be reduced to the adoption of foreign codes or standards – it must evolve from within the national administrative culture, balancing international best practices with domestic realities. Only through this adaptive synthesis can the state achieve a sustainable ethical environment that aligns with both global governance norms and the moral expectations of Kazakh society.

The analysis of the gender aspect in the context of compliance with ethical norms deserves special attention. Statistics show that among women civil servants, the level of ethical violations is 27% lower compared to men. This could be related to a higher level of responsibility and attention to detail, which is typical for women in their professional activities.

3.3 Analysis of the system of restrictions and benefits

While benefits and restrictions are legally prescribed, their ethical justification and societal acceptance depend on broader social determinants, including shared values of fairness, public duty, and professional integrity. The sustainability of these mechanisms is ensured not merely by compliance with legal norms but by the internalisation of ethical standards within the organisational culture of the civil service. Consequently, the perceived legitimacy of privileges and disciplinary measures is shaped by how effectively they align with societal notions of justice and moral responsibility in public administration.

Despite the demonstrated effectiveness of international models of civil service ethics, each of them presents structural limitations that complicate their transplantation into the Kazakhstani context. The Singaporean model, while successful in minimising corruption, is heavily dependent on strict centralised control, a high degree of administrative discipline, and a stable socio-economic environment. Such preconditions are difficult to replicate in states with more pluralistic governance and evolving institutional capacity. The French model, oriented towards codified regulation and the institutional authority of ethics commissioners, risks excessive legal formalism that may reduce ethical conduct to procedural compliance rather than genuine moral commitment. In turn, the Scandinavian model, grounded in social trust and self-regulation, presupposes a level of civic maturity and equality that is not yet fully established within Kazakhstan's public administration culture.

These structural tensions manifest as a gap between formal legal adoption and actual behavioural transformation. Ethical codes are often perceived as bureaucratic obligations rather than instruments of moral guidance, and monitoring mechanisms may prioritise control over internal motivation. Persistent factors such as hierarchical management traditions, limited transparency in recruitment, and uneven regional development hinder the establishment of a uniform ethical culture (Buribayev et al., 2015; Kotukov et al., 2025). The absence of deep-rooted traditions of participatory governance and civic accountability also constrains the adaptability of models based on public trust. Therefore, the critical challenge lies not in selecting a single foreign model but in synthesising their most viable elements into a coherent national framework that balances legal enforceability, ethical awareness, and social legitimacy. This requires a context-sensitive approach that combines gradual institutional reform with sustained investment in ethical education, professional mentorship, and the cultivation of civic trust as a foundational determinant of public integrity (Vaddiparti and Babaiev, 2025).

A crucial aspect of comparative analysis is the consideration of national contexts that shape the ethical and legal regulation of the civil service. Each country selected for comparison – Singapore, France, and the Scandinavian states – represents a distinct administrative and cultural model of public service ethics. The inclusion of these particular cases was not arbitrary but grounded in methodological considerations of diversity, institutional maturity, and the relevance of their governance models to the reform trajectory of Kazakhstan's civil service.

Singapore exemplifies the East Asian meritocratic model, characterised by strong administrative centralisation, strict ethical restrictions, and a culture of compliance rooted in Confucian values of loyalty and duty. The rationale for its inclusion lies in its proven effectiveness in reducing corruption through a combination of legal rigidity and social welfare provisions, which offers a valuable parallel for Kazakhstan as it seeks to reinforce ethical integrity while modernising its bureaucracy.

France, by contrast, represents the continental European legalistic model, where ethical norms are deeply embedded in administrative law and reinforced through the institution of ethics commissioners and specialised deontological codes. The French case was selected because of its long-standing system of administrative courts and codified deontology, which provides a contrasting approach based on normative precision and institutional independence – dimensions that remain under development in Kazakhstan.

The Scandinavian countries – Sweden, Norway, and Denmark – embody the Nordic participatory model, where ethics regulation relies less on coercive control and more on professional autonomy, social trust, and self-regulation. Their inclusion allows the study to capture the opposite end of the regulatory spectrum, where moral responsibility and civic culture substitute for legal restrictions. These societies are frequently cited in OECD governance reviews as benchmarks of public integrity and transparency, making them ideal comparators for evaluating the balance between formal rules and informal ethical capital.

This selection of cases thus ensures methodological representativeness across three governance traditions – legalistic, managerial, and cultural-normative – allowing for a triangulated understanding of ethical regulation. Such a comparative design minimises cultural and institutional bias, as it captures both rule-based and value-based systems of public ethics. Moreover, the inclusion of states with varying degrees of economic development and administrative centralisation enables a nuanced analysis of how ethical norms are embedded in different political cultures. The comparison highlights not only formal differences in legislation but also the sociocultural foundations of ethical behaviour in public service, revealing that effective ethical regulation is contingent on the broader moral ecosystem of governance.

The study of the system of benefits for civil servants in the context of the correlation between legal guarantees and ethical principles revealed different approaches to the formation of a social package. The most effective model was the one that combines a high level of social guarantees with strict ethical requirements. This approach includes comprehensive health insurance, extended pensions and additional educational opportunities for family members of civil servants, which significantly increases the prestige of government service and reduces corruption risks.

The study revealed the effectiveness of the system of "flexible benefits", in which an official can independently form a social package within the established budget. This model demonstrates high efficiency when combined with a developed system of ethical control and transparent mechanisms for granting benefits. An essential component of this system is the ability to adjust the preferences depending on the personal needs of the official. The discovery was the identification of the peculiarities of the influence of length of service on compliance with ethical standards. Liu et al. (2021) found similar patterns in the impact of experience on professional behaviour in a study on public trust in young civil servants. The study complemented these findings with specific percentages of violations depending on the length of service. The study revealed the specifics of the formation of ethical behaviour in different age groups of civil servants. Tao and Wen (2022), examining the motivation of young civil servants in China, found similar patterns in the impact of age on professional ethics. The study deepened this understanding by identifying specific mechanisms for adapting ethical requirements for different age groups. Particular attention is drawn to the individualised distribution of social guarantees depending on the level of responsibility and length of service. In this case, each type of benefit has a clear ethical justification and is accompanied by mechanisms to control their targeted use. This approach ensures a fair distribution of social guarantees and stimulates the professional development of employees.

The practice of combining tangible and intangible benefits is of considerable interest. Tangible benefits include additional health insurance, pension programmes, and housing compensation. Intangible benefits include professional development opportunities, flexible working hours, additional leave for ethical behaviour and high performance (Dankevych et al., 2024; Oklander et al., 2023). A significant result of the study was the identification of a direct correlation between the level of social guarantees and the ethical behaviour of civil servants. In the context of proper social security, there is an increase in the level of professional ethics, reduction of corruption risks and growth of the prestige of the civil service.

An important aspect of the study is the analysis of the relationship between the system of social guarantees and the level of ethical compliance by civil servants. Statistics on violations in the civil service system for 2019-2023 (Table 2) show a steady downward trend in the number of violations, which correlates with the introduction of an expanded package of social guarantees and the improvement of the ethical control system. According to Alimbekova et al. (2024), this positive trend is directly related to the increase in the level of social protection of civil servants.

Table 2 Dynamics of prosecution of civil servants of the Republic of Kazakhstan (2019-2023)

Year	Total number of violations	Ethical violations	Corruption offences	Disciplinary offences	Administrative offences
2019	1987	645	143	1012	187
2020	1856	598	132	945	181
2021	1765	534	128	923	180
2022	1654	487	121	876	170
2023	1543	456	115	812	160

Source. : compiled by the author based on Janenova and Knox (019b), Pelizzo and Knox (2021).

An in-depth analysis of the structure of violations conducted by Bokayev et al. (2024)

determined that although disciplinary offences remain the most common category of violations (52.6% in 2023), their absolute number shows a steady downward trend. The researchers attribute this to the strengthening of preventive measures and the improvement of the professional training system for civil servants.

Particular attention is devoted to the dynamics of corruption offences, which account for the smallest share in the overall structure of violations (7.4% in 2023). According to Kassymzhanova et al. (2022), this is the result of systematic efforts on the implementation of anti-corruption mechanisms and increasing the transparency of the civil service. At the same time, the researchers note the need to further improve corruption prevention mechanisms, especially in terms of income declaration and conflict of interest management.

An analysis of regional differences in the structure of violations shows that the lowest rates of violations are observed in the capital region, where a pilot project to implement an expanded ethical control system is in place. This confirms the effectiveness of the new control mechanisms and the feasibility of their extension to other regions of the country.

The study of the system of benefits for civil servants in the context of the correlation between legal guarantees and ethical principles revealed different approaches to the formation of a social package. The most effective model was the one that combines a high level of social guarantees with strict ethical requirements. This approach includes comprehensive health insurance, extended pension benefits and additional educational opportunities for family members of civil servants, which significantly increases the prestige of government service and reduces corruption risks. The study determined the effectiveness of the 'flexible benefits' system, in which an official can independently form a social package within the established budget. This model demonstrates high efficiency when combined with a developed system of ethical control and transparent mechanisms for granting benefits. An important element of this approach is the possibility of adjusting the benefits package following the individual needs of the employee, which ensures maximum efficiency of social guarantees.

The analysis of the relationship between the system of benefits and the ethical behaviour of civil servants has revealed important patterns. As such, a transparent and fair system of benefits significantly increases the motivation for ethical behaviour, while a differentiated approach to their provision creates healthy competition among employees and stimulates professional development. The 'ethical bonus' mechanism, which provides additional benefits for long-term compliance with ethical standards, including additional vacation days, extended health insurance, preferences in obtaining office housing, and priority in professional development programmes, has been particularly effective.

The study demonstrated the need to regularly review the system of privileges to account for changes in the socio-economic situation, new challenges in public administration and international social security standards. An important aspect is the creation of a unified electronic system for accounting and monitoring of benefits, which ensures transparency of their provision allowing for the assessment of efficiency and preventing abuse.

In the context of professional development, the importance of including educational opportunities, such as payment for additional education, internships abroad, participation in international conferences and professional development programmes, in the system of benefits was identified. Particular attention was devoted to long-term benefits, including accumulative pension schemes, long-term health insurance, housing programmes and educational programmes for employees' children.

Based on the analysis of international experience and the specifics of the Kazakh civil service system, a set of recommendations was developed to improve the system of restrictions and benefits for civil servants in Kazakhstan Table 3.

Table 3 Key recommendations for improving the system of restrictions and benefits for civil servants in the Republic of Kazakhstan

Direction	**Recommendation**
Legal and regulatory framework	Harmonisation of national legislation with international standards. Strengthening control over compliance with ethical standards (expanding the powers of ethics commissioners).
Ethical training	Introduction of mandatory continuing ethics education programmes. Differentiation of ethical training for different age and job categories.
Social security system	Development of a balanced system of tangible and intangible benefits. Clear ethical justification for each type of benefit. Linking ethical behaviour to benefits.
Institutional mechanisms	Implementation of a comprehensive system for monitoring and evaluating ethical behaviour. Development of mechanisms for public control over compliance with restrictions.
Organisational culture	Building a corporate culture focused on high ethical standards. Strengthening the role of managers in shaping the ethical behaviour of their subordinates.

Source. : compiled by the author based on Emrich-Emrich-Bakenova (2009), Bokayev et al. (2023), Transparency International (2020).

The proposed measures cover five key areas: legal and regulatory framework, ethical training, social security system, institutional mechanisms and organisational culture. Harmonisation of national legislation with international standards, introduction of mandatory continuing ethics education programmes and development of a balanced system of tangible and intangible benefits are central. Another important aspect is to strengthen institutional mechanisms for monitoring compliance with ethical standards, including the empowerment of ethics commissioners and the development of public control mechanisms. Implementation of these recommendations will create a comprehensive and effective system of ethical regulation of the civil service in Kazakhstan, which will contribute to the improvement of the integrity and professionalism of civil servants.

In the context of legislative regulation of restrictions and privileges for civil servants, it is worth noting the ambiguity of the current regulatory provisions. The existing system simultaneously reflects the main public legal obligations of civil servants, the violation of which leads to disciplinary liability, and establishes the violation of prohibitions and restrictions as a separate ground for termination of employment. This duality creates inconsistency in law enforcement and reduces the effectiveness of preventive measures (Kachur, 2021).

There is a need to develop mechanisms that would prevent management from treating individual offenders too harshly. Aside from the possible identity of prohibitions and disciplinary offences, the termination periods may not apply, allowing the contract to be terminated regardless of the time that has elapsed since the breach.

Administrative and disciplinary liability are special legal mechanisms in the civil service. Given the current challenges, disciplinary liability requires clarification and specification. This is supported by several factors. There is a need for a special regulation on the disciplinary liability of civil servants, and there is a lack of objectivity in alternative measures of liability. The situation is further complicated by the lack of transparency in the application of disciplinary sanctions and the absence of uniform principles of accountability. The problem is further exacerbated by the non-exhaustive list of disciplinary offences.

Importantly, these types of liability should not be opposed to each other but rather complement each other. When improving the legislation, a clear distinction between misconduct and violations should be made based on the specific liability measures (Samoilenko, 2020; Seredyuk, 2022). The clarity of the wording of prohibitions and restrictions prevents their arbitrary interpretation. While the current civil service legislation provides a framework for the formation of a professional workforce, it needs to be further developed. Existing gaps and contradictions, especially regarding prohibitions and restrictions, negatively affect the selection of adequate measures of liability. It is advisable to develop common approaches to the interpretation of key concepts in civil service legislation. This will contribute to more efficient performance of duties by civil servants and improvement of ethical and regulatory regulation of their activities, as well as to the formation of a transparent and fair system of restrictions and benefits (Shahini and Shahini, 2025; Sultanbayeva, 2013). Based on the study, the key principles of an effective system of benefits are formulated: transparency of the mechanisms for granting, clear ethical justification of each type of benefit, a differentiated approach depending on the level of responsibility, a combination of material and non-material incentives, the possibility of individual formation of a social package and the link between ethical behaviour and the number of benefits. A direct correlation between the level of social guarantees and the ethical behaviour of civil servants is established, which confirms the need for a balanced approach to the formation of a system of benefits and ethical requirements.

Compliance with ethical norms by civil servants is ensured not only by their personal moral self-regulation but also by creating an appropriate institutional environment. An important aspect of this is the formation of an effective ethical infrastructure of the civil service. The system of ethical regulation includes a set of tools designed to determine the acceptable and unacceptable forms of behaviour of civil servants.

The key elements of such an infrastructure are the political will of the national leadership to implement high ethical standards, without which any ethics initiatives are doomed to fail. Legislative frameworks that set out the criteria for ethical behaviour of public officials, as well as mechanisms for oversight and punishment for violations, play an important role. Other elements include professional codes of ethics that define standards of conduct for the civil service as a whole or for individual agencies and a system of guarantees and conditions for civil servants that eliminates insecurity and injustice and promotes honest work. Coordination bodies responsible for the implementation of ethical standards and management of the ethical component of public administration, as well as mechanisms for reporting, internal and external audit, and parliamentary oversight, play an essential role. Integral components are systems of professional socialisation and training of civil servants in ethical norms, as well as procedures for ensuring public control over the activities of the authorities.

The study revealed a particular role for the system of monitoring ethical behaviour and mechanisms for evaluating the effectiveness of ethical norms. Westlake (2024) emphasised the importance of systematic evaluation of civil servants' performance. The present study extends these conclusions by demonstrating the effectiveness of a comprehensive approach to assessing ethical behaviour. The study has established a correlation between the level of transparency of public authorities and compliance with ethical standards. Braams et al. (2022) also noted the importance of transparency in an analysis of the reasons for the reluctance of civil servants to perform certain tasks. The study deepened the understanding of this aspect, revealing that the introduction of public reporting mechanisms and public control significantly reduces the risk of ethical violations.

Professional codes of ethics are substantial in the ethical infrastructure. They set out the moral principles, norms and requirements for the conduct of government officials. Codes of ethics usually regulate the issues of conflicts of interest, official privileges, gifts, political neutrality, handling of information, labour discipline, etc. Different countries use different models of ethical codification, ranging from a single general code to a system of interrelated codes for individual agencies.

An important condition for the effectiveness of codes of ethics is to ensure that they are widely recognised and used by civil servants, that there is a system of rewards and sanctions for compliance and non-compliance, and that the codes are constantly monitored and improved. Alongside codes of ethics, other elements of the institutional infrastructure, such as legal safeguards, protection against arbitrary management, and whistleblowing mechanisms, are also substantial in maintaining high ethical standards in the civil service. In general, an effective ethics infrastructure is a prerequisite for ensuring integrity and trust in public authorities.

4 Conclusions

This study analysed the legal regulation of restrictions and privileges for civil servants, focusing on both ethical and regulatory frameworks. It explored various issues, including the foundations of civil service ethics, the international experience in ethical control, and mechanisms ensuring compliance with professional standards and social guarantees.

The study found that civil service systems are shaped by two interconnected components: ethical principles and regulatory frameworks. Ethical principles form the foundation for the regulatory framework, determining not only restrictions but also the moral justification for social guarantees. The experience of Kazakhstan, alongside international models from Singapore, France, and Scandinavian countries, highlights the need for further improvements in control and training mechanisms.

A comparative analysis revealed distinct approaches to balancing restrictions and benefits. Singapore's model emphasises strict restrictions, supported by robust social guarantees, while the Scandinavian model focuses on ethics education and self-regulation. France exemplifies a legalistic model, stressing clear legislative regulations and professional rights. The success of these systems relies on aligning benefits and social guarantees with the responsibilities of civil servants, ensuring transparency and reducing corruption.

The study also highlighted the importance of institutional mechanisms, including systems for control, training, and professional development, in ensuring the effectiveness of ethical regulation. Developing a corporate culture centred on high ethical standards and enhancing public control over civil servants' compliance are critical to fostering public trust in state institutions.

Future research should broaden the international comparison, examining a wider range of countries to explore how political systems, economic conditions, and cultural contexts affect civil service ethics. Long-term studies would also shed light on how shifts in political regimes and technological advancements influence ethical practices. The impact of globalisation and digitalisation on public sector ethics, particularly concerning data privacy and accountability, warrants further exploration.

Based on the study's findings, several recommendations for improving Kazakhstan's civil service regulations were made. These include expanding the powers of ethics commissioners, updating the Code of Ethics for digital behaviour, and creating a unified electronic system for monitoring ethical violations. Further recommendations include introducing mandatory ethics education, developing differentiated training programmes for civil servants, and implementing flexible social benefit systems tied to ethical performance. Additionally, establishing an international network of ethics commissioners and using modern data analysis methods can improve the effectiveness of ethical regulations globally.

To fully implement ethical standards, it is essential to harmonise methodologies for assessing civil service ethics, creating a global database of best practices. This will help identify success factors and risks in different systems, ultimately enhancing the integrity and effectiveness of the civil service worldwide.

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LULËZIM BARJAMEMAJ* & KRISZTINA KARSAI** & GIOLA CAMI***

Cross-border interception of telecommunications in relation to sovereignty and fundamental rights and freedoms: The case of Albania

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Abstract

Evidence collection in criminal procedure requires a careful balance between effective investigative powers and the protection of fundamental rights. While traditional mechanisms of international cooperation are grounded in territorial jurisdiction and formal procedural safeguards, cross-border interception of communications challenges these models, particularly in the context of electronic evidence. Due to efficiency concerns with lengthy procedures in traditional mechanisms, newer cooperation instruments reconfigure jurisdictional and procedural powers. This study examines how cross-border evidence-gathering mechanisms implicate the principle of state sovereignty and fundamental rights, particularly where procedural safeguards differ across legal systems. It analyses the interaction between the Council of Europe framework for mutual legal assistance, centered on letters rogatory, and European Union instruments governing interception and electronic evidence. Employing normative analysis on the jurisprudence of the European Court of Justice and the European Court of Human Rights, this study argues that newly established cross-border evidence-gathering mechanisms entail asymmetric implications for state sovereignty and fundamental rights, as legal systems embed different levels of procedural safeguards and judicial oversight. This structural imbalance is exemplified by the regulatory framework and judicial practice of Albania, serving as a case study of how state sovereignty and fundamental rights are balanced in cross-border interception practices.

Keywords: *cooperation instruments, procedural powers, sovereignty, fundamental rights.*

1 Introduction

In recent decades, particularly following the end of the Cold War, the acceleration of telecommunication and information technology has played a pivotal role in driving transformation and innovation (Smil, 2025). These developments have diversified interactions among individuals and institutions and have redefined and challenged the traditional *modus operandi* of engagement within society. While globalization has unprecedentedly facilitated cross-border openness and interconnectedness[1], the increased use of computers and the internet has si-

[1] The 'openness' term was presented in conjunction with globalization in 2010 when the United Nations Office on Drugs and Crime reported their assessment on The Globalization of Crime: A Transnational Organized Crime Threat Assessment. See https://www.unodc.org/documents/data-and-analysis/tocta/TOCTA_Report_2010_low_res.pdf (Accessed on

multaneously introduced new challenges for criminal law. Specifically, the emergence of digital telecommunication has resulted in the proliferation of vast datasets distributed across transnational environments, complicating investigative efforts in criminal proceedings. Encrypted telecommunication services such as EncroChat and SkyECC have marked a turning point in assessing the necessity of and control over access to such datasets, raising critical legal and operational challenges for law enforcement agencies (de Jonge & de Vries, 2024). In particular, data-driven work in a cross-border context has encountered several novel complexities in the realm of international cooperation, as traditional instruments such as Mutual Legal Assistance (hereinafter referred to as MLA) are commonly associated with lengthy and cumbersome procedures (Tosza, 2024, p. 143). *Letters rogatory* – anchored at the core of the MLA, are a formal request issued by the judicial authorities of one state to the competent authorities of another aimed at obtaining evidence. This mechanism, grounded in territorial sovereignty, requires the involvement of central authorities, such as ministries of justice, as well as compliance with the procedural safeguards of the requested state – a procedural chain of authorizations associated with extended timelines.

This has prompted law enforcement authorities to establish and adapt both substantive and procedural regulations to address transnational crime challenges, especially those correlated with the governance of cross-border interception of telecommunications and/or access to electronic evidence[2]. As technology innovates and integrates intensely in society, investigative measures are bound to technological developments such as internet-based and encrypted applications. As a result, investigative powers now extend access to subscriber, traffic and content data, often obtained in cross-border operations, rather than exclusively within a single national territory.

In this context, cross-border telecommunication refers to the legally authorized act of accessing and capturing a subject's telecommunication data—whether transmitted via wire, radio, electromagnetic, photoelectronic, or photo-optical systems—by law enforcement agencies for the purpose of criminal investigation (Council of the European Union, 1995). Under recent instruments governing procedural powers in criminal matters, the interception of telecommunications is no longer viewed as limited solely to the content of telecommunications. It also encompasses the collection of traffic and location data correlated with such telecommunication (Directive 2014/41/EU of the European Parliament and of the Council, 2014, para. 30).

As the MLA framework has been criticized for its limited functionality—largely due to its reliance on outdated principles of territoriality (Tosza, 2023, p. 216)—new data-gathering instruments have been introduced. These tools establish a direct interplay between the judicial authority of the prosecuting state (issuing state) and a private entity outside its jurisdiction (Forlani, 2023). The debate on cross-border data access centers on the tension between traditional legal instruments and the growing practice of direct access to service providers. In particular, discussions surrounding the interception of telecommunications highlight issues of state sovereignty in criminal matters. Such investigations frequently intersect with the principle of territoriality, raising complex jurisdictional and sovereignty concerns (European

February 20, 2025).

[2] In 2018, the European Commission reported that over half of all investigations involved a cross-border request for access to electronic evidence. See their Impact Assessment Report 'Accompanying the document Proposal for a Regulation of the European Parliament and of the Council on European Production and Preservation Orders for electronic evidence in criminal matters and Proposal for a Directive of the European Parliament and of the Council laying down harmonized rules on the appointment of legal representatives for the purpose of gathering evidence in criminal proceedings,' No. 118, pp.14, 2018, Brussel. See https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0118&from=EN (Accessed on February 20, 2025).

Commission, 2024).

This study selectively analyzes the procedural regulations governing MLA in Albania, an EU Candidate country. While Albania is a party to the European Convention on Mutual Assistance in Criminal Matters and continues to apply a sovereignty-centered MLA framework based on letters rogatory, it is simultaneously engaged in accelerated efforts to approximate its domestic legislation with the EU acquis. This two-fold positioning anchors Albania at the intersection of traditional international cooperation mechanisms and novel mechanisms of cross-border evidence gathering in compliance with EU Acquis. A case study of Albania, hence, elucidates asymmetries between territorial principled safeguards and new practices seeking to bypass lengthy procedural processes. Under the Albanian legal framework, state sovereignty is primarily exercised through judicial and investigative authority, which governs the state's ability to prosecute, investigate, and adjudicate criminal offenses (Republic of Albania, 1998, Art. 7, parts 9–10). As a fundamental component of criminal procedural law, this authority is closely linked to the principle of territoriality, rendering cross-border investigative measures—especially in the context of telecommunication interception—a particularly sensitive issue in the sovereignty debate (Republic of Albania, 1995, Art. 2). Article 148 of the Constitution grants to the prosecution the authority to conduct criminal prosecutions and represent cases in court. When evidence collection significantly intrudes on privacy, the Criminal Procedure Code mandates judicial oversight to ensure proportionality through a court-issued decision. Within Albania's jurisdiction, investigative actions are readily enforceable, as judicial decisions are binding on all individuals and entities—public and private—within the national territory[3].

Nevertheless, when evidence collection extends beyond Albania's borders, neither the courts nor the prosecution possess direct authority over foreign individuals or entities. In such cases, interstate cooperation becomes essential for accessing and collecting evidence, necessitating legal engagement with the jurisdiction of another state. As organized crime is increasingly spanning through the territories of multiple countries (Eurojust, 2024), there is need for enhanced cross-border investigations. As a result, state authorities collaborate to access telecommunications while ensuring that evidence interception respects state sovereignty and complies with the legal frameworks of each jurisdiction. Legal complications emerge when a state intercepts telecommunications abroad without approval, particularly under legal systems that differ from those where the evidence is eventually employed. This study argues that evidence obtained vis-à-vis cross-border interception procedures, potentially outcomes asymmetric implications, particularly where such investigatory powers involve jurisdictions operating under uneven procedural safeguards and lying outside the scope of mutual trust framework.

Consequently, the admissibility of such evidence comes under legal scrutiny, as demonstrated in the EncroChat operation (Europol, 2023), where French authorities intercepted telecommunications without prior authorization from the states where the subjects, encompassing those located in Albania, were situated (*MN* (EncroChat), 2024). The case raises a critical question: Is such evidence legally admissible in criminal proceedings in Albania, and does it comply with domestic and international legal standards?

The current study explores the complex interplay between state sovereignty, due process, and cross-border telecommunication interception and aims to answer the following questions: First, how do cross-border telecommunication interceptions challenge national sovereignty? Second, how does the Albanian legal framework regulate the use of intercepted

[3] We are referring to the Albanian legislation, as it is the subject of the paper, but we can say that the same rules apply mutatis mutandis to other jurisdictions.

telecommunications as evidence, and to what extent does it align with standards set by the European Union (EU) and the Council of Europe (CoE)? Third, what are the implications of cross-border interceptions for fundamental rights, particularly in terms of due process and the admissibility of cross-border evidence?

The first part of the analysis will examine doctrinal developments related to the concept of state sovereignty and the challenges encountered in cross-border criminal investigations, with globalization and technological advancements blurring the lines. The analysis will also explore the theoretical distinction between the interception of telecommunications and the collection of electronic evidence, focusing on the human rights implications arising from data externalization.

The second part of the analysis will investigate the interaction between state sovereignty and international legal frameworks, assessing how CoE and EU instruments regulate cross-border cooperation while safeguarding privacy and due process. Additionally, it will review the European Court of Human Rights (ECtHR) and the Court of Justice of the EU (CJEU) case law, including the EncroChat ruling *(MN (EncroChat), 2024),* to clarify key legal challenges associated with cross-border evidence gathering and the preservation of state sovereignty. Ultimately, this study seeks to address the tensions between state sovereignty, transnational crime, and legal standards and determine whether procedural reforms are necessary to achieve a more balanced approach for governing cross-border data processing.

2 Methodology

This doctoral research adopts a qualitative legal methodology, integrating an in-law analysis of scholarly literature on one side, and regulations composed of statutory provisions and case-law interpretations on the other side. We critically examine procedural norms, legal doctrines, and judicial jurisprudence governing cross-border telecommunication interception to assess their legal consistency, as well as compliance with human rights and sovereignty principles. This research employs doctrinal analysis of Albanian constitutional and criminal procedural law, focusing on norms governing the interception of telecommunications and the admissibility of evidence. Particular attention was given to provisions that mandate judicial authorization and define procedural consequences for unlawfully obtained evidence. Moreover, the investigation reviews jurisprudence based on relevant ECtHR and CJEU rulings. Case law was selected for its relevance to state sovereignty, the protection of fundamental rights, and the use of cross-border evidence in criminal proceedings. While the selected ECtHR judgments establish minimum standards, CJEU rulings assess the implications of procedural safeguards within EU cooperation mechanisms. In addition, selected Albanian case law clarifies how domestic courts balance sovereignty with evidence. Finally, the study proposes *de lege ferenda* recommendations to refine the integrity of cross-border data collection with regard to telecommunication interception.

3 Doctrinal perspectives

3.1. State sovereignty in international criminal law

The principle of sovereignty has been foundational to the concept of nation-states since 1648, when the Peace of Westphalia ended the Thirty Years' War and established the framework for the modern international order. International law has long considered territoriality a defining feature of state sovereignty, constituting, *in concreto,* the legitimate exercise of criminal jurisdiction within a state's territorial boundaries (Beale, 2023). Hence, sovereignty is intrinsically linked to jurisdiction; international law defines the boundaries of sovereignty by limiting how states exercise jurisdiction to prevent conflicts (Kelsen, 1952). *In stricto*, the enforcement of criminal law across borders is constrained by international law through the principle of jurisdiction, which empowers states to prescribe, adjudicate, and enforce (Livoja, 2010; Malanczuk, 1997; Payer, 2023). *Prima facie*, sovereignty is, hence, understood as a fixed, well-defined, and unchangeable concept. However, this monolithic and rigid view has been increasingly challenged by scholars who characterize sovereignty as dynamic and flexible (Kelsen, 1960), capable of evolving within legal frameworks and international relations (Cryer, 2005). Although initially treated as a theoretical matter, the traditional Westphalian notion of absolute state sovereignty has been challenged by the emergence of human rights and transformed into a more limited and accountable concept (Brooks, 2012).

The most significant challenge to the monolithic view of state sovereignty in criminal law arises from the evolving nature of crime, fuelled by rapid advancements in telecommunications and technology. The proliferation of cross-border data exchange in the digital space has defied legal governance, prompting lawmakers to adopt normative regulations embedded in the principle of state intervention (Glen, 2014). A core argument concerns the position of current state measures along the spectrum between techno-authoritarianism and protectionism in safeguarding data and digital infrastructure fall (Burwell and Propp, 2022). Although the debate remains underdeveloped, the question whether cyberspace should be regarded as a distinct domain, given its borderless and decentralized architecture, could bolster claims of autonomy from territorial sovereignty (Wu, 1997). This proposition has largely been rejected in favour of applying territorial sovereignty and jurisdiction to cyber infrastructure (Heintschel von Heinegg, 2012).

Against this theoretical background, evidence collection—involving access to data either produced or stored in another state's jurisdiction—has been increasingly subject to cross-border investigative powers. Nonetheless, when data are accessed from foreign territories, concerns emerge regarding potential infringements on state sovereignty (Sieber and Neubert, 2017). The transnational nature of crime has made international cooperation crucial for the exercise of investigative powers; such cooperation depends on instruments established in international treaties through which signatory states voluntarily cede a degree of sovereignty by committing to shared rights and obligations (Ouwerkerk, 2015). The principle of dual criminality has traditionally upheld state sovereignty by restricting foreign interference in domestic legal matters. Nevertheless, as cross-border crimes have grown increasingly complex, the principle of territoriality has been adjusted through cooperative mechanisms designed to address these challenges more effectively (Braum, 2020). In the EU, the mutual recognition principle[4] enshrined in Article 82 of the Treaty on the Functioning of the European Union (TFEU) strengthens cooperation in criminal matters, notwithstanding inefficiencies that have been raised when cross-border data access interfered with sovereignty (Braum, 2020).

Cross-border data gathering poses the most significant challenge to the state sovereignty, as it allows states to assert extraterritorial enforcement jurisdiction, compelling entities to disclose data stored in foreign territories, and often bypassing MLA treaties (Currie, 2017). Investigative powers in a cross-border context have redefined jurisdiction by adapting sovereignty to a new principle of 'extended territoriality', which permits states to assert authority over

[4] The principle of mutual recognition as the foundation of judicial cooperation in criminal cases was first presented in 1999 at the Tampere European Council. The European Arrest Warrant (2002) was the first major implementation of the principle in criminal law. However, the Treaty of Lisbon (2009) further reinforced its legal basis in the TFEU, formally attributing mutual recognition as the foundation of judicial cooperation in criminal matters.

data that is substantially connected to their territory, even if physically located elsewhere (Coughlan et al., 2014, p. 35–36). In this context, extraterritoriality revises rather than erodes the traditional understanding of state sovereignty tied to national territory, as data cannot be reduced to a purely technical category. Because data inherently carry human rights implications, and its flow is indifferent to the physical borders, jurisdictional conflicts expose the limits of classic territorial jurisdiction (Obendiek, 2022). Although extraterritorial jurisdiction is legitimated as a procedural remedy to cross-border data flows, its relational interplay with data legality, over protectionist policies, and data protection norms gives rise to tensions with traditional conceptions of state sovereignty. These tensions have elicited divergent distinct approaches. The International Court of Justice stipulates that states should exercise their sovereignty within the limits of international law (Permanent Court of International Justice [PCIJ], 1927, p. 19). EU policymaking has adopted a pluralist approach to transnational law within the Union, therefore softening the hierarchical or exclusive conception of sovereignty to accommodate policies in favour to interacting legal orders. National law, EU cooperation mechanisms, and human rights frameworks concurrently exercise authority over data, leaving courts burdened with the responsibility to assess the proportionality legal issues. For instance, the Convention Implementing the Schengen Agreement allows for the relaxation of sovereignty constraints between EU Member States to allow cross-border surveillance or hot pursuit, prioritizing efficiency and expediency in criminal investigations (Convention Implementing the Schengen Agreement, 1990, Art. 40). In certain cases, practical considerations may override national sovereignty, potentially paving the way for more collaborative, transnational policing. Cross-border interception of communications exemplifies this tension, as EU cooperation mechanisms interplay with domestic procedural regimes within a partially integrated framework of procedural safeguards.

3.1 Legal and procedural considerations in cross-border telecommunications

Within the framework of international law governing cross-border access, the CoE offers procedural powers that allow the search, seizure, preservation, and interception of data, all of which are applicable in the context of administering electronic evidence in criminal proceedings (Council of Europe, Cybercrime Convention Committee [T-CY], 2012). The Budapest Convention on Cybercrimes (hereinafter referred to as the Budapest Convention) classifies electronic evidence into three categories: subscriber data, traffic data, and content data[5], the latter is obtained via real-time collection or recording of content data on specified telecommunications (Council of Europe, 2001, Art. 21, para. 2). Additionally, the Explanatory Report to the Budapest Convention examines the investigative powers enabling the real-time interception of content data, encompassing technical means such as direct system access, eavesdropping, or tapping devices, which enable monitoring, recording, or collecting telecommunications within the jurisdiction of the issuing state (Council of Europe, 2001, para. 53). This provision is crucial for enhancing investigative efficiency in handling electronic evidence by introducing measures that may overlap with the interception of telecommunications, a distinct investigative power. Such dynamics have been addressed in a ruling by the CJEU, which clarifies that decrypting telecommunications from internet-based applications constitutes interception rather than mere monitoring, particularly when it involves capturing traffic, loca-

[5] The three categories of evidence are stipulated in Articles 18, 20, and 21 of the Convention on Cybercrime, Budapest, 23.11.2001, ETS No. 185. While subscriber data and traffic data differ in substance from the interception of communication, content data bears a closer resemblance to interception, as it contains the actual substance of a communication. Nonetheless, the key distinction lies in the temporal aspect—content data refers to already stored information, whereas interception encompasses real-time access to ongoing telecommunications.

tion, and content data in real time (*MN* (EncroChat), 2024).This distinction is fundamental because interception necessitates notification to the state where the targeted individuals are located, whereas traditional electronic evidence collection does not.

In the same spirit, following the cross-border interception of data from the Sky ECC application, the Constitutional Court in Albania (Constitutional Court of Albania, 2024) distinguishes the interception of telecommunications from evidence by asserting that interception is merely a method of collecting information in real time and does not automatically qualify as admissible evidence. Moreover, the court noted that intercepted data must undergo legal validation before being employed in judicial proceedings, ensuring compliance with procedural guarantees, authenticity requirements, and due process principles. The court established that intercepted data alone is insufficient unless processed according to established evidentiary rules.

3.2 A Perspective on human rights implications

Digitalization's interference with sovereignty requires a substantial procedural reconsideration of established data governance frameworks, especially in light of the significant challenges posed by cross-border data acquisition and investigative powers. The un-territoriality of data (Daskal, 2015) has primarily raised jurisdictional dilemmas, with the most delicate issue being the balance between public interest and privacy, and broader implications for human rights. The CoE and the EU have established shared safeguards for human rights, particularly in the criminal law domain, enshrined in two key instruments: the European Convention on Human Rights (ECHR) and the Union's Charter on Fundamental Rights (CFREU) (Bose, 2023). The ECtHR has particularly addressed the violations of Article 8 in some cases, ruling that authorized measures have interfered with the relevant rights, specifically in the context of investigative powers correlated with interception and surveillance (European Court of Human Rights, 2002, 2018). Furthermore, the Court has held that laws mandating bulk retention of all internet communications, providing unrestricted access to security services, and requiring decryption of end-to-end encrypted messages breach Article 8 when they lack adequate safeguards and undermine the right to private life (European Court of Human Rights, 2024). This ongoing debate underscores the urgent need for robust mechanisms to ensure fairness in data processing, grounded in the principles of legality and necessity (Topalnakos, 2023). Nevertheless, the aforementioned safeguards are rooted in data protection legal guarantees, which are asymmetrical among jurisdictions and offer imbalanced protection levels (Alimonti, 2022). Thus, some jurisdictions applying stricter protection rules have pushed for the extraterritoriality of domestic data protection law toward other jurisdictions, with perceived weaker standards (Hornkohl, 2022; Taylor, 2015). Notably, the CJEU has institutionalized the EU's externalization of its data protection law by systematically evaluating whether third countries meet the Union's standards (Fabbrini and Celeste, 2021; Tzanou, 2021), notably in its Schrems I & II case law (Data Protection Commissioner v Facebook Ireland Ltd and Maximillian Schrems (Schrems II), 2020; Maximillian Schrems v Data Protection Commissioner, 2015).

4 Discussion

4.1 Legal conditions for the interception of telecommunications under Albanian law

The notion of legally obtained evidence is first introduced in Article 32 (2) of the Constitution of the Republic of Albania, which stipulates that *no one can be declared guilty based on* *evidence collected unlawfully.* While this constitutional provision establishes a standard for the admissibility of evidence at trial, it is the domain of criminal procedural legislation—as a special law (*lex specialis*)—to define what constitutes unlawful collection (*contra legem*) and how such evidence should be sanctioned. Accordingly, Article 151 of the Code of Criminal Procedure of the Republic of Albania (CPrC) stipulates that evidence obtained in violation of legal prohibitions may not be used at trial. Hence, the constitutional term 'evidence obtained unlawfully' should not be interpreted as referring to any evidence gathered with mere procedural irregularities; it only indicates evidence collected in breach of explicit legal prohibitions. The concept of inadmissibility implies that the evidence completely loses its probative value and cannot be subjected to judicial evaluation. Thus, inadmissibility should be understood as a procedural sanction that affects evidence collected in violation of legal prohibitions (Ligori, 2015, p. 101).

An analysis of Articles 222–226 of the CPrC reveals that Albanian procedural law aligns with the minimum standards established at the European level. Article 221(a) of the CPrC stipulates that the interception of a person's private telecommunications, utilizing any transmitting device, is permissible only in cases involving intentional crimes for which the maximum penalty is no less than seven years of imprisonment. Article 221(b) and (c) expands the scope of offenses eligible for interception beyond the general rule tied to maximum penalties, allowing for interception in certain lower-penalty crimes. Considering that interception fundamentally infringes upon the right to private life, Article 221(3) of the CPrC stipulates that interception may be ordered against the following subjects: (i) a person suspected of committing a criminal offense; (ii) a person suspected of receiving or transmitting telecommunications from the suspect; (iii) a person involved in transactions with the suspect; and iv) a person whose surveillance could result in the discovery of the suspect's location or identity. From a literal and purposive interpretation of this provision, we conclude that interception may be ordered only against the subjects listed exhaustively in this provision. Thus, *a contrario*, interception cannot be authorized against individuals who have no connection—even indirect—with the criminal offense under investigation.

Referring to the standards established by the ECtHR, and in order to understand the national legislative approach, it appears that the Albanian legislator has aimed to ensure and reflect every jurisprudential development and safeguard established by the ECtHR. Specifically, the ECtHR stated that, to legalize secret interception measures, states must meet certain guarantees to prevent abuse of power. These include the following: (i) the legal provision must contain a definition of the nature of the criminal offenses for which this evidence-gathering tool may be employed; (ii) the legal provision must contain a definition of the categories of persons responsible for the interception; (iii) a time limit for the duration of the interception must be established; (iv) the procedure to be followed for examining, utilizing, and storing the obtained data must be regulated; (v) precautionary measures during the telecommunication of the data to other parties must be established; and (vi) the circumstances in which the recordings may or must be deleted or destroyed must be stipulated (*Roman Zakharov v. Russia*, 2015).

Finally, Article 225 of the CPrC provides for the possibility of employing and transferring the results of interceptions beyond the specific criminal proceeding in which they were obtained. Thus, for the purposes of another criminal proceeding, interception results gathered for a previous criminal proceeding are submitted to another prosecuting authority.

4.2 CoE and EU legal framework for mutual legal assistance

The CoE adopted the European Convention on Mutual Assistance in Criminal Matters of 1959 (hereinafter referred to as the '*Convention'*) to establish a legal framework for MLA in criminal matters. This Convention was ratified by Albania in 1999[6] and is an integral part of the domestic legal system.[7] Additionally, the CPrC [8] and the Law No. 10 193, dated 3.12.2009, 'On Jurisdictional Relations with Foreign Authorities in Criminal Matters,'[9] offer more detailed provisions implementing international norms in this area. The Convention aims to allow parties to offer one another legal assistance in criminal matters within the scope of their respective jurisdictions.

While the Convention seeks to facilitate the exchange of evidence between Member States, this does not imply that a European legal framework has been adopted that allows for the automatic and unimpeded provision of legal assistance. The contracting parties retain full sovereign rights and have full discretion over whether to execute a request from another state. The requested state may refuse MLA if it considers that executing the request would compromise its sovereignty, security, or the fundamental interests of its legal order. Similarly, to protect its sovereignty and legal system, Article 505 of the CPrC provides that the Minister of Justice of Albania shall not grant a letter rogatory if the investigative actions requested by a foreign authority are expressly prohibited by Albanian legislation. This provision confirms that Albania cannot extend legal assistance to a foreign authority when such investigative actions contradict the core principles of its national legal order.

Article 15 of the Convention embodies the political design of letters rogatory, by designating the Ministry of Justice as the intermediary in cross-border cooperation, including the scrutiny of requests in urgent cases.

Meanwhile, within EU's jurisdiction, the European Parliament and the Council adopted Directive 2014/41/EU on the European Investigation Order in Criminal Matters (hereinafter referred to as 'EIO Directive') to facilitate the exchange of evidence without the interference and decision-making of administrative and political authorities. The EIO, enforceable among Member States [10] based on the principle of mutual recognition of criminal judgments, differs from traditional MLA by replacing the 'requesting/requested State' terminology with 'issuing/executing State' (Karsai, 2019, 9.156). An EIO allows the issuing state to request either the gathering of new evidence abroad or the transfer of evidence already obtained by another Member State and must be executed without added formalities by the executing authority, as enshrined in the *forum regit actum principle.* The executing authority must follow EIO formalities and procedures unless this is contrary to its fundamental principles and legal order (Tomasits, 2021, p. 85).

Since its implementation in 2017–2018, the EIO has become the primary instrument for obtaining evidence across EU Member States, facilitating cross-border investigations while still encountering legal and practical challenges (Guerra and Janssens, 2019, p. 46).

Articles 31 and 32 of the EIO Directive differentiate between cases requiring communication with the executing state and those allowing interception without it. When technical assistance from the state where the subject is located is essential, the execution of the EIO to authorize and continue the interception may be refused if a similar investigative measure (in-

[6] The Convention was ratified by the means of Law No. 8498, dated 10.6.1999, 'On Jurisdictional Relations with Foreign Authorities in Criminal Matters' OJ. 21-1999.

[7] Art. 5 in. review with Art. 122 of the Constitution.

[8] Art. 505 et seq. of the Code of Criminal Procedure.

[9] Art. 13–30.

[10] While the EIO has been adopted by most of the EU Member States, Denmark and Ireland have not implemented it within their national legal frameworks.

terception) is not authorized by the state's authorities in a domestic context. This provision is fundamentally based on the principle of equivalence, which affirms that the same legal remedies (*actiones*) and procedural rules applicable under the national legislation of Member States should be applied analogously to legal actions according to EU legislation, as noted by the Advocate General (Jääskinen, 2013). This principle is applied to preserve sovereign rights and guarantee the protection of the rights of intercepted subjects, with the state conducting the interception having the right and the obligation to make decisions in accordance with its domestic law. Notably, this instrument does not have a suspensive or abrogative effect on Member States' obligations to respect fundamental rights and legal principles enshrined in Article 6 of the Treaty on the EU, encompassing rights correlated with the effective protection of individuals in criminal proceedings and any obligations placed on procedural authorities in this regard (Kordík and Kurilovská, 2018, p. 4). Conversely, the EIO Directive is the first EU instrument based on the principle of mutual recognition of judicial decisions that explicitly establishes the protection of fundamental rights and freedoms of individuals as valid grounds for refusing execution (Dediu, 2018, p. 207).

When the technical assistance of the state in which the target of interception is located is not required, the proceeding state (the notifying state) must inform the state where the interception will be performed (the notified state) before the commencement of the interception if known in advance. If the cross-border nature of the interception only becomes apparent during or after its execution, then the notifying state must give notice as soon as it is aware of this fact. Should the legislation of the notified state prohibit such an interception in a similar domestic context, it has the right to request, within 96 hours of obtaining the notification from the proceeding state, the termination of the interception and the destruction of the data acquired up to that point. Contrarily, if the notified state does not act within this timeframe, then it is deemed to consent to the interception being conducted by the proceeding state within its territory.

In addition to real-time cross-border interception, the EIO Directive provides for the possibility of transferring the results of the interception of telecommunications already in the possession of a Member State. Nonetheless, in this case, the EIO Directive ensures that the issuance of an EIO must pass the legality test of the requested investigative action, stipulating that the order for obtaining evidence already in the possession of an authority in one Member State is allowed only if such a measure (the transfer of already gathered evidence) would have been ordered in a similar domestic case.

4.3. General overview of the ECtHR jurisprudence regarding cross-border evidence

The adoption of international instruments in the field of MLA in criminal matters naturally raises concerns regarding the elements of due process, particularly when evidence is obtained outside the territory of the prosecuting state. Such situations challenge the full application of the principle of equality of arms (*audi alter partem*). As affirmed by the ECtHR, the Convention does not contain specific provisions on the admissibility of evidence. Therefore, its assessment as a court extends only to the violation of Article 6 of the ECtHR during the procedure of collecting evidence, highlighting that the accused and their representative must have the opportunity to effectively challenge the cross-border evidence during the trial (*audi alter partem principle*).

Following a 2001 ECtHR judgement, the applicant claimed a breach of the right to a fair trial because his conviction was largely based on evidence acquired through international procedures via letters rogatory from the United States, with no opportunity to cross-examine the witnesses (European Court of Human Rights, 2001). The ECtHR reiterated that all evidence should be presented in a public hearing, in the presence of the accused, allowing for an adversarial argument. Nevertheless, this does not mean that testimonies must invariably be made in public court sessions.

In another case involving similar claims regarding the violation of due process due to the inability to question a witness in a public hearing, the ECtHR ruled in favor of the applicant (A.M. v. Italy, 1999). Additionally, the court has reasoned that the information, which emanates from diverse, objective, and concurring sources, establishes that there was, at the material time, a 'real risk' that the impugned statements had been acquired in Morocco utilizing methods prohibited by Article 3 of the Convention (European Court of Human Rights, 2012).

These three ECtHR rulings serve as guidelines for cross-border evidence-gathering procedures, reiterating the significance of respecting the principles of due process. While acquiring evidence beyond the territorial borders of the prosecuting state is not in itself contrary to the ECtHR, it is essential to guarantee that the right to effectively challenge such evidence is preserved during or after its acquisition.

4.3 CJEU jurisprudence: standards deriving from the 'EncroChat' case

Based on the above discussion, recent developments in the case law of the CJEU are particularly significant. For instance, numerous critical questions were raised regarding the interpretation of the EIO Directive's provisions and the legality of transferring data acquired through cross-border interception by one state outside of its own territory and without permission or notification of other states where the intercepted subject was located *(MN (EncroChat), 2024).*

The case concerns decryption and subsequent comprehensive collection of data from the servers of a mass telecommunication application. Specifically, the French police, assisted by Dutch experts and acting under authorization from a national court in accordance with domestic regulations, succeeded in breaching the encrypted service of the *EncroChat* telecommunication application (MN (EncroChat), 2024). The case raises concerns about compliance with the EIO Directive, as French authorities unilaterally decrypted and recorded all EncroChat data without temporal or territorial limitations, subsequently transferring that data to Germany based on EIOs issued by German prosecutors.

The case is pivotal for clarifying the EIO Directive, particularly regarding competent authorities, conditions for evidence transfer, the nature of decryption processes, requirements for notification and cooperation in cross-border interception, and the evidentiary use and contestability of such intercepted data CJEU clarified that the EIO Directive does not exclusively designate judicial authorities as the issuing authority for EIOs, concluding that a prosecutor also has the authority to request evidence from outside their state's territory, provided this authority is recognized under the domestic law of the issuing state.

Regarding the conditions for issuing an EIO for the transfer of evidence already in the possession of the executing state, the CJEU explained that the EIO Directive sought to unify the fragmented legal basis concerning cross-border evidence exchange. It added that the issuing state, under the principle of mutual recognition of judicial decisions, cannot question the evidence-gathering procedure by the executing state. Accepting the contrary would render the entire new system regulated by the EIO Directive ineffective. Nonetheless, the CJEU also clarified that this does not imply a waiver of guarantees correlated with fair legal process.

In interpreting Article 6 of the EIO Directive, the court explicated that this legal instrument does not itself limit the issuance of an EIO for evidence already held by another Member

State but instead requires compliance with the principle of equivalence pursuant to the issuing state's law.

The CJEU also addressed the procedural nature of measures involving the penetration of endpoint devices to collect traffic, location, and telecommunication data from an internet-based telecommunication service, interpreting that this process constitutes "communication interception". If conducted outside the territory of the executing state, according to Article 31 of the EIO Directive, it must be processed with notification to the state where the intercepted subjects are geographically located.

After exhausting all procedural tests, the CJEU concluded that data acquired from decrypting applications such as 'EncroChat' may be employed as evidence by national criminal courts. However, such evidence must be excluded from trial if it has a predominant impact on determining guilt and the defendant has not been provided with a meaningful opportunity to challenge and contest the legality and evidentiary value of the data.

4.4 Possibility of utilizing cross-border interception as evidence

As previously explained, interception of telecommunications as a means of evidence collection must be ordered by a court, in strict adherence to the legal conditions for permitting such interception of telecommunications. From the Albanian perspective, the legal assessment is not confined solely to the verification of the legal conditions (applicable law and factual circumstances) of the foreign authority's decision but also extends to the legal implications of such interceptions when conducted by individuals who acted within the Albanian territory.

A narrow (*strictu sensu*) interpretation of Article 222 of the CPrC, in conjunction with Article 226, reveals that the Albanian legislator allows the admissibility of interception of telecommunication results acquired from foreign authorities, only when they are being processed through letters of rogatory. The lack of a decision from Albanian judicial authorities, for interceptions conducted on subjects located within Albanian territory, would constitute an unlawful exercise of procedural powers, infringing upon state sovereignty. The investigative power correlated with the interception of telecommunications belongs to the courts of the Republic of Albania, as one of the elements of exercising sovereignty independently. Even more so, when the foreign authority conducts an interception without identifying the subject being intercepted as provided for in Article 221 (3) of the *CPrC* of the Republic of Albania, the evidence becomes inadmissible.

The argument against the admissibility of telecommunication interception results obtained in this manner is also correlated with the inability of the intercepted subject to effectively challenge the judicial decision that authorized such interception jeopardizing the rights granted in Article 6 of the ECtHR. Consequently, a decision authorizing the interception of telecommunications of such a subject outside the territory of the state conducting the investigation may exceed the legal conditions outlined above. Consequently, the data obtained from the interception of telecommunications would be ruled inadmissible, barring no probative value.

In a similar case, the former Court of Appeal for Serious Crimes (CASC) reasoned that the interceptions conducted by foreign authorities against individuals who were geographically located in the Republic of Albania were inadmissible in the criminal proceedings being held in Albania (Court of Appeal for Serious Crimes, 2009, Decision No. 2). CASC argued that, under the interpretation of the procedural criminal law and the international conventions ratified by Albania, the interception of Albanian nationals' phone conversations within the territory of the Republic of Albania was a violation of the country's sovereignty in exercising criminal prosecution and administering justice. CASC clarified that Italian authorities had intercepted fixed and mobile phone numbers assigned by Albanian telecommunication companies employed by Albanian nationals engaged in drug trafficking extending to Albania, Italy, and beyond. By doing so, the Italian judicial authority performed investigative actions within the Albanian territory—it exercised its jurisdiction (judicial function) within the territory, and assumed the exclusive functions of the Albanian state, without such a right being granted by Albanian domestic law or any bilateral international agreements, thereby infringing upon Albanian sovereignty (Court of Appeal for Serious Crimes, 2009, Decision No. 2, p. 30).

The limits on the admissibility of cross-border interceptions do not prevent the prosecution from investigating the criminal act through other lawful means of searching/obtaining evidence. Although the results of the telecommunication interceptions conducted as described above are inadmissible, they may still provide the prosecution with grounds to initiate an in-depth investigation, in line with the principle of due process.

5 Conclusions

In the broader analysis of the regulatory framework governing the collection of cross-border evidence and the usage of interception as an evidentiary tool, we contend that, despite the shared purpose of facilitating cross-border evidence gathering—MLA instruments and the newly introduced EU mechanisms—propel asymmetric implications for state sovereignty and fundamental rights. While letters rogatory remain anchored in territorial sovereignty and preserve ex ante judicial oversight, newer mechanisms prioritize procedural efficiency and post hoc safeguards, with the effect of reallocating control over investigative powers. Sovereignty in the context of investigative measures involving digital components is no longer exercised solely through territorial control; instead, it is being reconfigured through legal powers and procedural controls over investigative actions. Cross-border interception practices exemplify how sovereignty is recalibrated with authority being reconsidered in layered legal orders, with courts policing jurisdictional boundaries vis-à-vis the assessment of proportionality, legality, and fundamental rights protection.

This procedural divergence is particularly relevant for Albania, a non-EU member, currently engaged in accelerated accession procedures. Although the mutual recognition paradigm and its associated procedural safeguards have not been yet incorporated into the domestic legal order, Albania's reliance on prior judicial authorization and stringent admissibility rules, rather than outdated practices, reflects a constitutional commitment mitigating risks arising from cross-border interception practices. In this sense, the Albanian approach contributes to a broader European debate on procedural guarantees, affirming a sovereignty-conscious approach mitigating the attenuation of constitutional guarantees in the pursuit of investigative efficiency.

Where conflicts stem between Albanian constitutional standards and nascent evidentiary practices, the limits of legal convergence are reflected. For intercepted data obtained by means of EU mechanisms without prior territorial authorization, Albanian courts remain constitutionally bound to assess such evidence against domestic guarantees of due process and privacy, as mandated by Articles 6 and 8 of ECHR. This tension suggests that mutual trust paradigm is insufficient to sustain effective cross-border cooperation, and that, in this regard, differences in sovereignty and fundamental rights protection must be taken into account, particularly for jurisdictions engaged in EU accession processes. With regard to the ongoing debate within the EU, CJEU has already clearly articulated the nature of the decryption process of the 'EncroChat' application and the conditions under which data acquired through this process may be lawfully utilized. While the CJEU lacks the authority to render a binding decision beyond its jurisdiction, we argue that this decision is, nonetheless, instructive for Albanian courts for several reasons. First, the CJEU's ruling is distinctive within European jurisprudence, providing Albanian courts with a precedent for defining the decryption process of the 'EncroChat' application and similar platforms. Second, this decision addresses critical questions and informs on the establishment of appropriate safeguards for defendants during the evidentiary debate, an issue that should be carefully considered by Albanian courts for ensuring procedural fairness. Third, considering that comparative law is a recognized method of legal interpretation, the spirit of this decision holds relevance for comprehending the broader issues addressed by the ECtHR in its jurisprudence.

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The Influence of Bulgarian Horticulture on Twinning in Hungary: The case of Albania

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Abstract

The aim of this paper is to explore the historical and cultural significance of Bulgarian horticulture in Hungary and its influence on the development of twinning relationships between Bulgarian and Hungarian municipalities. The study employs a comprehensive analysis of historical literature and census data from 2001 to 2022 to characterise the Bulgarian minority in Hungary and track its historical changes. The research utilises databases from the National Association of Municipalities in Hungary (TÖOSZ) and the National Union of Local Governments in Bulgaria (NSORB) to identify and examine twinning relationships between municipalities. Interviews with cultural and community representatives supplement the analysis. The study investigates the motivations behind twinning, emphasising intraethnic cooperation and the desire to strengthen ties between ethnic minorities and their kin states. The research identifies specific partnerships that were established due to the historical presence of Bulgarian communities in Hungary. The findings suggest that while Bulgarian–Hungarian twinning relations are rare; they reflect a unique form of cultural heritage and promote collaboration in addressing local and global challenges. The paper contributes to understanding how historical ties and cultural practices influence contemporary international relations at the municipal level.

Keywords: *paradiplomacy, sister cities, twinning relations, Bulgarian minority, intraethnic cooperation*

1 Introduction[1]

Today, cities are a critical engine of the global economy, global information flows, and the global mobility of goods and people (Acuto, 2016). According to Enyedi (1997), the development of durable external relations is a hallmark of a flourishing city, one form of which is the twinning/town twinning partnership, based in part on geographical proximity, which typically spread after World War II (Kézai P. and Páthy, 2023). Cooperations can arise for a variety of reasons, such as trade, cultural relations, sporting events, and international educational exchanges (Krankovits, 2020; O'Toole, 2001; Riner and Becklenberg, 2001; Tham and Shim, 2025; Zelinsky, 1991). In all cases, the partners wish to cooperate toward a specific socioeconomic outcome, and this cooperation is provided with a legal framework in the form of a contract (Prasittisopin et al., 2024).

[1] This article is a revised version of a study originally published in Hungarian as: Baranyai, N., & Kézai, P. K. (2025). A bolgárkertészeti múlt megjelenése a bolgár–magyar testvértelepülési kapcsolatokban. Tér és Társadalom, 39(4), 183–206. https://doi.org/10.17649/TET.39.4.3644

Studies of diplomacy that focus on twinning have mainly examined relations between metropolitan areas. Tidwell (2020) explored the emergence of US-China paradiplomatic relations, and Chatterji and Saha (2017) focused on US relations with India and China. In Asia, O'Toole (2001) first examined Japan's twinning relations with Australia, and Mori (2023) examined Japan's twinning network. Utomo and Widiana (2024) use Surabaya, Indonesia, and Kitakyushu, Japan, as examples to illustrate green twinning. Amiri and Grandi (2021) examined diplomatic relations between cities in Europe and North America, while Karvounis (2020) looked at the European dimension of the paradiplomatic network of Greek municipalities. Regarding the twinning networks of large cities in the Central and Eastern European region, Kézai P. and Páthy (2023) found that in the Central European region, partnerships are mainly concentrated in small towns, mainly between Hungarian, Polish, and Romanian cities. Laguerre (2019) examined the new digital dimension of international city twinning and pointed out that digital platforms allow city-twinning relationships to go beyond cultural exchange and become new tools for global governance, innovation, and social participation.

Our recent study belongs to a series of analyses that examine the relationships between a diaspora and the kin state (Campbell, 2015), or, on the other hand, between a given state and the kin state of those who have migrated there (van Ewijk & Baud, 2009), with a focus on Bulgarian gardeners settled in Hungary. The research underlying the present study examines the international diplomatic activities of municipalities in Hungary. As part of this, it (also) investigates the twinning relations of settlements with significant ethnic minorities, with a special emphasis on intraethnic cooperation, which may primarily manifest itself in relations with the kin state. The term 'settlements with significant ethnic minorities' is neither theoretically nor methodologically defined, and the category of settlements can be interpreted based on various legal conceptions and spatial development documents. The Law on National Minorities, adopted in 2011, links certain powers to the proportion of a given nationality within a settlement, reflecting international practice (twenty or ten per cent according to the latest census, see § 5 and § 6). The census results also form the basis for the right of ethnic communities to form local minority self-governments; today, twenty-five persons belonging to the nationality in question are required as a general rule, and twenty persons if certain conditions are met (§ 56). The category of 'areas with significant nationalities' also appears in development policy, at least at the conceptual level (OFTK, 2014). This study does not aim to clarify this issue but merely to highlight that such classifications exist – however, within different frameworks – indicating that this category is relevant.

Among the nationalities recognised in Hungary, the Bulgarian community is particularly small and dispersed. Although the community has been able to form local minority self-governments since its de jure recognition (1993) – only one in 1994, but already 33 in 2024 – the proportion in Hungarian settlements remains below the required threshold for additional rights under current legislation. Although they cannot be regarded as 'settlements with significant ethnic minorities', some municipalities inhabited by the community have historical characteristics involving the Bulgarian horticultural past that make examining their twinning relations worthwhile.

The literature on Bulgarians, Bulgarian gardeners, and Bulgarian horticulture in Hungary is also considerable and extensive. These subjects have been of interest because of their importance to the domestic food supply. Menyhárt (2021) analysed in the most comprehensive way the history of the Bulgarian community in Hungary. In addition to her research on linguistics, social and economic history, and ethnography, she devoted a special chapter to the work of Hungarian and Bulgarian researchers dealing with this theme. In addition to work in the field of linguistics (Menyhárt, 2017), as well as linguistic-biographical (Menyhárt, 2020) and historical (Miklós, 2009; Peykovska, 2013) studies of Bulgarians, there are also significant works in the Hungarian literature that provide a comprehensive description of Bulgarian folklore and culture (Boross, 1973; Csoma, 1987), as well as studies of agricultural statistics (Révész, 1915), as well as papers analysing the specific economic structure and work organisation of Bulgarian gardeners (Bódi and Savova, 2018). Several local historical and ethnographic works (Galambos, 2016; Király, 2001; Macher, 2020; Mlecsenkov, 2024; Mód, 2019; Rémiás, 2010; Varró, 2024; Vukov, 2024; Zsilák, 2014) have also been published concerning Bulgarian horticulture, and it is evident that there is still significant interest in exploring the Bulgarian gardening past, as studies and thematic special issues on the subject are still being published (Bulgarian Folklore, 2024). Although the history, significance, and impact of Bulgarians and Bulgarian horticulture in Hungary have been examined from many angles in the literature, no work has yet been published that examines the international relevance of this topic. In this study, we aim to examine relations between Bulgarian and Hungarian municipalities, focusing on settlements with local self-governments that were once home to Bulgarian horticulturalists and still have a significant Bulgarian ethnic population, to assess the relevance of Bulgaria's horticultural past to the development of twinning relations.

2 Methodology

This study investigates the extent to which the settlement of Bulgarians in Hungary and the horticultural traditions they established continue to influence the presence and identity of Bulgarian communities today. Furthermore, it examines how this historical and cultural heritage has been preserved within the settlements where Bulgarian horticulture once played a defining role, and how these continuities are reflected in contemporary Bulgarian–Hungarian twinning relations. To address these research objectives, a multi-method approach was used, integrating the analysis of secondary literature, statistical data, and databases, complemented by interviews.

2.1 Secondary data analysis

The characteristics of national minorities in Hungary were examined based on census data collected between 2001 and 2022. Particular attention was paid to the Bulgarian nationality, whose ethnic composition and historical transformation were analysed in detail. Historical national and local census records from 1910, together with relevant scholarly literature, helped identify and substantiate the historical presence of Bulgarian communities in specific localities.

The relationships between Hungarian and Bulgarian municipalities were identified through two national databases:

The NSORB database (National Union of Local Governments of the Republic of Bulgaria/Natsionalno Sdruzhenie Na Obshtinite V Republica Bulgariya) provides data on Bulgarian municipalities, including their twin settlements, population characteristics, geographical location, the nature and type of cooperation agreements, and thematic areas of collaboration.

The TÖOSZ database (National Association of Local Authorities/Települési Önkormányzatok Országos Szövetsége) compiles information based on a 2018 survey of Hungarian local governments, supplemented by additional institutional and documentary sources. It records municipal, county, and capital-district twinning arrangements, indicating the year of agreement, formal status, and the thematic focus of cooperation.

From these databases, bilateral partnerships involving Bulgarian and Hungarian municipalities were extracted and analysed. These were subsequently compared with settlements identified in the literature and statistical data as possessing a Bulgarian ethnic or horticultural heritage.

2.2 Semi-structured interviews and content analysis for validation

The database findings were verified and enriched through semi-structured interviews conducted with the head of the Bulgarian Cultural, Documentation and Information Centre and members of the Association of Bulgarians in Hungary. To gain a deeper understanding of twinning relations, we conducted interviews with the current and former leaders of the relevant local minority self-governments and local governments. The interviews were carried out by telephone between 15 January and 27 June 2025, each lasting approximately 30 to 45 minutes.

Additional verification was carried out through information available on the official websites of the respective settlements. The comprehensive research framework, together with the specific methodological approaches applied to each research question, is presented in Table 1.

Table 1 Research framework

	Research question	Applied methodology
RQ1.	To what extent do the Bulgarians who settled in Hungary and the Bulgarian horticulture they established still determine the presence of Bulgarian communities today?	Analysis of TÖOSZ and NSORB database Content analysis of interviews
RQ2.	How has this heritage been preserved in the settlements where Bulgarian horticulture was once located?	Content analysis of interviews Content analysis of settlement websites
RQ3.	How is this manifested in existing Bulgarian–Hungarian twinning relations?	Analysis of TÖOSZ and NSORB database Content analysis of interviews

Source. : Author's compilation.

3 Bulgarian gardeners in Hungary

Bulgarians, for historical reasons, live in and around Hungary's major cities. The Bulgarians were one of the earliest ethnic groups to join the Hungarian nation, probably before the so-called conquest. Three distinct phases of settlement in later centuries can be distinguished, each with its own motivation and geographical orientation. The first two waves of settlement (second half of the 14th century – 1526, last decade of the 17th century – mid-18th century) were mainly motivated by flight from Turkish rule, while the third (from the last third of the 19th century) was determined by economic interests. In contrast to the earlier Roman Catholic Bulgarians, those who arrived in the third wave were Orthodox and moved to Hungary only for temporary, seasonal work (Miklós, 2009). In the 19th and 20th centuries, the Bulgarian nationality in Hungary was linked to horticulture (Menyhárt, 2021). The emergence of Bulgarian gardeners in Hungary can be traced back to two main factors, which mutually reinforced the migration processes. The dissolution of the Ottoman Empire can be identified among the primary push factors, while among the pull factors, the development and urbanisation after the Austrian–Hungarian Compromise (1867) can be identified (Bódi and Savova, 2018).

The emergence and development of Bulgarian horticulture were naturalised by Ottoman rule, which, with the establishment of the free state in 1878, created unfavourable circumstances for gardening merchants due to the lack of demand and markets for products, the absence of a national citizenry, and the lack of local industry (İnalcık and Quataert, 1994). As a result of these changed frames, emigration from Bulgaria began (Grbić Jakopović, 2015), and by 1888, more than 9,555 gardeners (11% of the occupational group) had left the Tarnovo district, and by 1914, more than half a million more had followed (Csoma, 1987). It was, therefore, mainly from these urban, deprived, highly agricultural areas that gardeners left for the big cities of the neighbouring countries. They moved especially to areas where urban development was not accompanied by agriculture capable of supplying the urban population (Boross, 1973), and where they continued to do what they had learned at home on rented plots (Bódi and Savova, 2018).

The emigration from the mid-19th to the mid-20th century was one of Bulgaria's most important international economic migrations (Mód, 2024). Many Bulgarian gardeners arrived in Hungary, mainly from around the old capital, Veliko Tarnovo (Csoma, 2019; Peykovska, 1998, 2013), where intensive horticulture in Bulgaria was first developed to provide food for the Turkish army (Csoma, 1987). In contrast, Hungary was about 100-150 years behind in horticultural activity, which became a problem during the relatively late phase of urbanisation – the larger settlements, especially Budapest, were supplied by German horticulture, but this was no longer sufficient in the second half of the 19th century, opening the way for Bulgarian gardeners (Boross, 1973). Gardeners arriving in Hungary typically settled around Budapest and near railway transport centres, but later they also appeared in smaller but more significant towns (Peykovska, 1998, 2013). Geographical location was an important factor in the choice of location for horticulture, and for irrigated farming, predominantly vegetable production, they chose areas supplied with water and/or close to waterbodies, where they rented land (Miklós, 2009; Varga, 2021).

Initially, they stayed in Hungary seasonally, from February to November, and lived in Bulgaria for the rest of the year (Naydenov, 2022). The gardening groups were typically composed only of men (Csoma, 1987; Peykovska, 2013), and only later did they permanently move to Hungary – this time with their families. However, ties to Bulgaria and the dual lifestyle persisted, as evidenced by the fact that they typically farmed on rented land rather than on their own property, and most of their income from sales was used to support families left at home (Csoma, 1987; Révész, 1915). This period was the first so-called 'transitional phase' of the modern-day settlement of Bulgarians, followed by the second phase (1915–1945), when elements of national life were institutionalised. Educational, ecclesiastical and social institutions were established (Association of Bulgarians in Hungary, 1914; Bulgarian Orthodox Church Community, 1916, later Bulgarian Church and School Community, 1917) at this time, and a horticultural journal (Bolgarski Godinár, 1928) was founded (Csoma, 1987; Menyhárt, 2023), which created the preconditions for genuine settlement and helped to end commuting. The third phase was the period of the emergence of a stable Bulgarian community in Hungary, and at the same time, of its internal transformation and integration into society, which was completed by the time of the regime change with the inclusion of the Bulgarians in the recognised nationalities (Bódi and Savova, 2018; Doncsev, 2013).

The influence of the Bulgarian gardeners was also noticeable in the emergence of so-called Bulgarian-style horticulture and in work organisation (Bódi and Savova, 2018). Between 1912 and 1913, the number of Hungarian-owned but Bulgarian-styled horticultural holdings increased from 697 to 1,592, while the number of Bulgarian horticultural holdings decreased from 872 to 649 during the same period. Besides the First Balkan War (Bulgarians temporarily stopped gardening because of their participation in the war), state incentives also encouraged the establishment of horticulture by Hungarian owners and labour, with land cultivated in the Bulgarian way. After World War II, as in other agricultural regions of the country, Bulgarian and Bulgarian-style horticulture were collectivised; the last to go was the Hungarian–Bulgarian Friendship Cooperative, which operated between 1956 and 1979. The result of collectivisation was also that some Bulgarian gardeners gave up vegetable growing and went into industry (Peykovska, 2013, Menyhárt, 2023). Based on employment data, agricultural activity is a thing of the past among the Bulgarian population in Hungary, but vegetable production still plays a central role in the life of certain regions or settlements due to the former Bulgarian horticulture (Betekintő, 2002; Velkey et al., 2021).

The spatial dispersion of Bulgarians in Hungary today still results from the Bulgarian horticultural past, with the 'centres' of the community still being the previously inhabited settlements. According to the results of the 1930 census, a total of 2,816 Bulgarians were living in the territory of then-Hungary, the largest numbers in Pest-Pilis-Solt-Kiskun county (884 persons) and Budapest (721 persons). There were also a significant number of Bulgarians in Miskolc (139), Pécs (65), and in the central regions of the country, in Fejér (89), Jász-Nagykun-Szolnok (87), and Komárom-Esztergom (85) counties. Among the settlements with Bulgarian communities, we find data (in literature, censuses, and other documents) confirming the presence of Bulgarians in Bánhida, Cegléd, Cibakháza, Dunaharaszti, Dunakeszi, Felsőzsolca, Fót, Lórév, Nógrádverőce, Nagyrábé, Piliscsév, Szegvár, Szentes, Szigetszentmiklós and Sződ, as well as Rákospalota, Soroksár and Zugló, which are now part of the districts of Budapest. The names of the public areas and outskirts of some settlements also recall the former Bulgarian horticulture and communities (e.g., Bolgárkertész utca [Bulgarian Gardeners street] in Zugló, Halásztelek, and Szentes). In Halásztelek, where there is still a significant Bulgarian community, there is a locality name sign in Bulgarian. In several places (Dunaharaszti, Felsőzsolca, Kispest, Óbuda, Soroksár, Szigetszentmiklós, and Zugló), the Bulgarian horticultural past has been preserved in public spaces as statues and fountains. One of the most well-known monuments is the Bulgarian Wheel monument in Halásztelek from 2007 (Menyhárt, 2020).

4 The Bulgarian nationality in Hungary

Censuses conducted in the early 20th century in Hungary did not provide data on nationality, national or ethnic identity, but on mother tongue. However, at the local level, communities with relatively small numbers, including Bulgarians, were included in the 'other' category, so no information is available on their numbers. Thus, the presence of Bulgarians in a settlement at that time could be inferred from the number of Orthodox believers.[2] In the State socialist period, data on nationalities were provided only for the Gypsy, Croat, German, Romanian, Serb, and Slovak communities, and from 1980 onwards also for the Slovenian communities. For other ethnic minorities, the number of groups can only be estimated based on mother tongue. Bulgarian nationality was only recognised after the regime change. The final provision of the 1993 Law on Minorities listed, in detail, the Bulgarian, Gypsy, Greek, Croatian, Polish, German, Armenian, Romanian, Ruthenian, Serbian, Slovak, Slovene, and Ukrainian communities recognised, in the terminology of the time, as national and ethnic minorities. The new legislation adopted in 2011 and its Annex I left the previous list on recognized mi-

[2] If the number of people of the Orthodox religion exceeded the number of (mainly) Serb or Romanian native speakers, and if there were also people of the 'other' category in the settlement, they were presumably Bulgarians.

norities unchanged.

Table 2 Evolution of the number of recognised nationalities in Hungary between 2001 and 2022 (number of persons)

Nationalities	Census		
	2001	2011	2022
Gypsy (Roma)	205,720	315,583	209,909
German	120,344	185,696	142,551
Slovak	39,266	35,208	29,881
Romanian	14,781	35,641	27,554
Ukrainian	7,393	7,396	24,615
Croatian	25,730	26,774	21,824
Serbian	7,350	10,038	11,622
Polish	5,144	7,001	7,398
Russian	2,079	3,882	7,111
Greek	6,619	4,642	6,178
Bulgarian	2,316	6,272	6,109
Armenian	1,165	3,571	4,199
Slovenian	4,832	2,820	3,965

Source. : Based on Hungarian Central Statistical Office (HCSO) (2022)

As mentioned above, Bulgarians are one of the thirteen nationalities in Hungary and one of the smallest communities. In terms of the total number of the community[3], this almost doubled between 2001 and 2011 (from 2,316 to 6,272), while it has remained almost stable over the last decade (6,209 in 2022). In the Bulgarian community, symbolic ethnicity prevails (Tátrai, 2014; Tóth and Vékás, 2013), as, due to linguistic assimilation, the curves of nationality and language data are increasingly diverging. In this case, identity is linked to respect for national roots rather than to everyday practice, genuine cultural and linguistic attachment, and the use of minority institutions. The AN index, which shows the number of Bulgarian native speakers per 100 persons who declare Bulgarian national identity, is a good illustration of this phenomenon. It confirms the above statements, with values among Bulgarians decreasing from 95.7 (2001) and 81.5 (2011) to 67.3 (2022).

[3] During the 2022 census, it was possible to indicate ethnic ties in three questions: nationality, mother tongue, and language used in the family and friendship community. The total number of people belonging to a nationality includes people of all three categories.

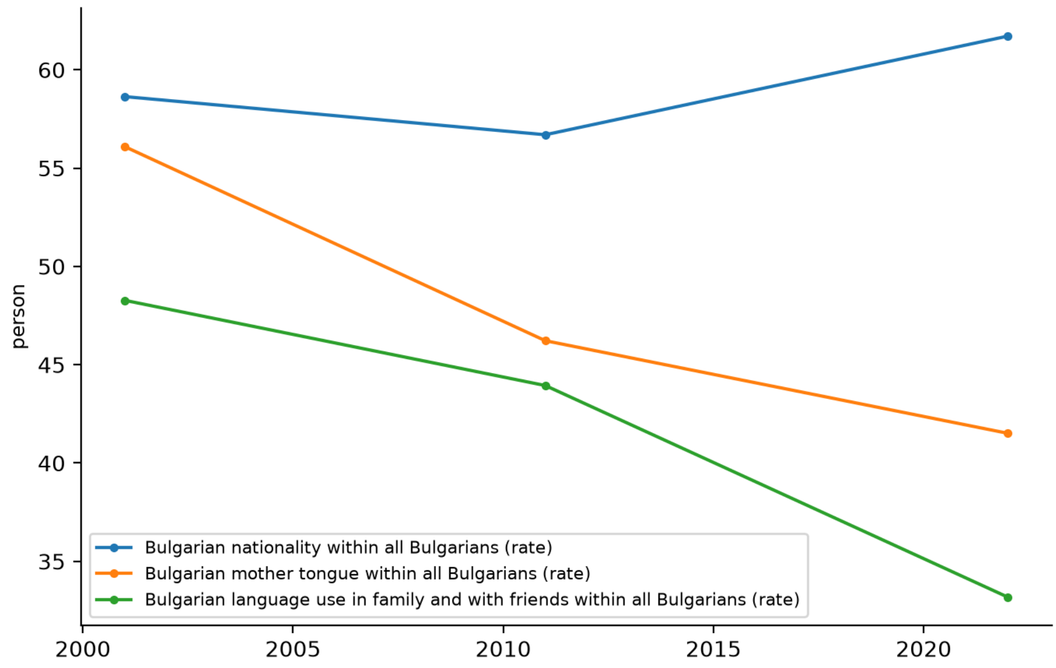

Figure 1 Characteristics of the Bulgarian minority in Hungary between 2001 and 2022 (persons, percentage)

Source: Author's compilation based on Hungarian Central Statistical Office (HCSO) (2022)

Most of the Bulgarian gardeners who did not settle permanently later moved back home, but those who stayed, together with those who later came to Hungary to study or work, and those who joined by marriage and now have a Bulgarian identity, form the backbone of the Bulgarian community today (Menyhárt, 2021). The Bulgarian population in Hungary can be described as culturally and linguistically heterogeneous, with an urban lifestyle that consciously strives to preserve its identity (Menyhárt, 2020, 2021). Several Bulgarian families lived and still live in the neighbourhoods of Csepel, Halásztelek, Dunaharaszti, Szigetszentmiklós, Lórév, Pécs, Miskolc, and Szolnok. According to the 2022 census (Hungarian Central Statistical Office (HCSO), 2022), the most populous Bulgarian communities are found in Budapest (1902 people), Szeged (118 people), and Pécs (102 people), while the most significant proportion of Bulgarians live in the villages of Sármellék (2.7%) and Lórév (2.4%).

Minority self-governments also indicate the presence of the Bulgarian community. According to the current legislation, the establishment of a local minority self-government (based on the results of the last census) requires at least 25 persons with ethnic identity, or at least 20 persons with ethnic identity, in addition to a minority self-government or a national minority institution (e.g., a national minority school) in the settlement during the previous municipal term. The first minority self-government was established in Halásztelek in 1994. In subsequent terms, municipalities were established in the big towns, in the capital districts – where the Bulgarian community is not otherwise sizeable in the population – and in the municipalities where former Bulgarian horticulture was located. Currently, as *Figure 3* shows, settlements where Bulgarian nationality can be detected (in 2022), and a local government is functioning (in 2024) at the same time, are relatively rare and are mostly located in the capital districts and regional centres (marked in black). Consequently, not all settlements with a Bulgarian presence (marked in dark grey) became eligible to establish a minority self-government in the 2024 local government cycle: for example, in Felsőzsolca, although a minority self-government has been operating since 2002, only 16 people declared themselves Bulgarian in 2022, which is below the legal minimum.

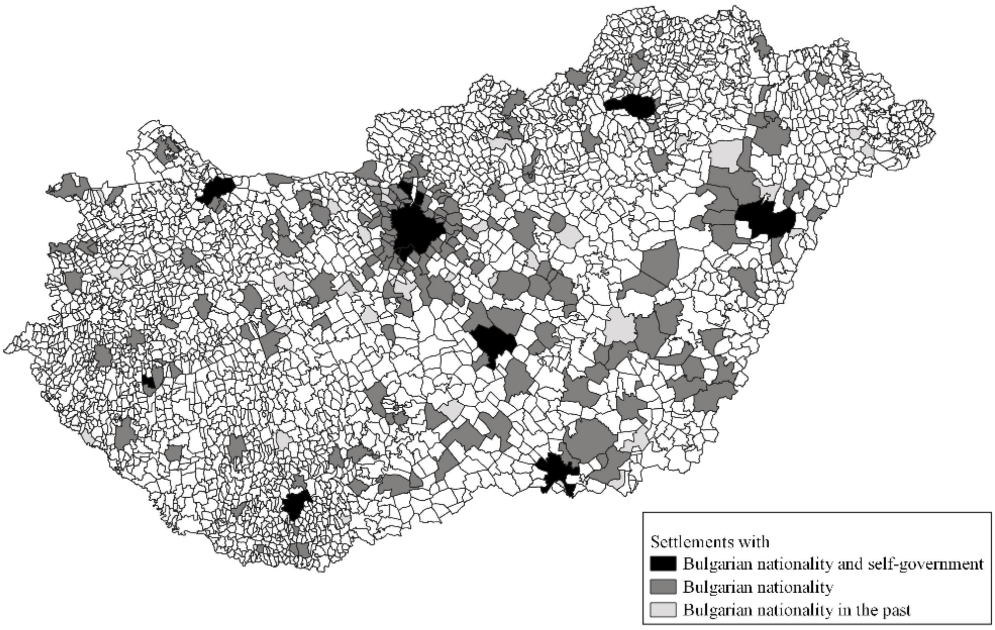

Figure 2 Municipal characteristics of the Bulgarian minority and Bulgarian minority self-governments in Hungary

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Source: Author's compilation based on Hungarian Central Statistical Office (HCSO) (2022) and Hungarian National Election Office (HNEO) (2024)

5 Bulgarian–Hungarian twinning relations with a focus on the horticultural past

In this chapter, we review the status and importance of Bulgarian–Hungarian relations within wider twinning relations based on the Bulgarian NSORB database and the domestic TÖOSZ database, and then, focusing on Bulgarian–Hungarian relations, we look for traces of the Bulgarian horticultural past. According to the Bulgarian NSORB database, Bulgarian municipalities have established 1,185 twinning relationships with municipalities in other countries. Europe plays a key role in the orientation of relations (Figure 4), with 85% of partnerships established with municipalities in countries on the European continent (1016 twinning partnerships). Most of the contacts have been with Russia (123 twinning contacts), but neighbouring countries also play a prominent role in the twinning network, with 107 municipalities in Greece, 93 in Romania, 92 in Turkey, 81 in Serbia, and 67 in Northern Macedonia. Cooperation with municipalities in Western Europe is less frequent, with the highest number of partnerships in Italy (61), while the numbers for France (31) and Spain (30) are the same as for Hungary.

With 30 contacts in the database, Hungary is Bulgaria's eleventh most important partner on the continent and the sixth most important partner in the European Union. Among the Hungarian partner cities are several districts of the capital and settlements around Budapest.

The dominant role in the relations is played by cities with country rights; however, there are also a high number of smaller rural municipalities among the partners (e.g., Ajak, Csopak, Hajdúsámson, Hollókő, Kazincbarcika, Kunszentmiklós, Paks, Siklós, Szentes, Tiszafüred).

According to the TÖOSZ database compiled in 2018, Hungarian municipalities have concluded 3,705 official twinning agreements, of which 3,041 (82%) involve cooperation within the Central and Eastern European region. Romania, Slovakia, Germany, Poland, and Austria are the five most important partner countries. Bulgaria ranks 17th in terms of the number of twinning agreements concluded. According to the database, 22 Bulgarian municipalities have signed 28 twinning agreements with 25 different Hungarian municipalities (Figure 5).

Twinning relations with Bulgarian municipalities are among the rarest in Hungary, as Bulgaria is not a neighbouring state and the historical links between the two countries are not particularly significant. However, like other nationalities, municipalities or minority self-governments with a relatively large (or once large) Bulgarian community actively foster relations with municipalities of the motherland. As suggested by Curtis (2016), these collaborative efforts allow local governments to learn from and adapt solutions in their partner cities to address specific challenges in their communities, which often coincide with global issues such as climate change. An excellent example of knowledge adaptation is the case of Bulgarian gardeners who settled in Hungary, creating a new horticultural culture (introducing and spreading tomato, pepper, and cabbage cultivation), and later initiating the development of several twinning relations.

The establishment of twinning relations can, of course, be motivated by several factors, including the socio-political period and context in which the relationship is formed. Of course, we could not examine the story behind every twinning relationship, but based on our knowledge, we tried to form groups that encompass the range of possible motivations. Among Bulgarian–Hungarian relations, we can find general international cooperation (e.g., Aheloy and Ajak) and even partnerships directed from the central level during the State socialist period (e.g., Blagoevgrad and Székesfehérvár, Burgas and Miskolc). Although some of the listed cooperating municipalities have a history of Bulgarian horticulture or have Bulgarian communities living there today, this was not the motivation for establishing links, or at least we could not prove this (e.g., Ravda and Dunakeszi, Lyaskovets and Tiszafüred, Veliko Tarnovo and Sopron). In some of the Bulgarian–Hungarian twinning relations, the influence of former Bulgarian horticulture can be traced to the present day, as suggested by the characteristics of the emergence and later settlement of the Bulgarian population in Hungary (Figure 5). In the initial phase of Bulgarian gardeners' presence in Hungary, commuting and caring for those left at home maintained links among the disparate nuclear family units and, indirectly, among settlements in different countries. This relationship with extended family, more distant relatives, and friends may also have persisted during the final resettlement to Hungary. We know that the most famous and best-farming Bulgarian gardeners who arrived in Hungary came from the area around Veliko Tarnovo – Draganovo, Polikraishte, Gorna Oryahovitsa, Lyaskovets, Dragichevo, and Merdanya (Csoma, 1987) – and that strong Bulgarian identity and strong ties with the motherland were especially maintained among those who came from this region (Bódi and Savova, 2018).

This bond also determines the twinning relationships of settlements that were once home to Bulgarian horticulture, because – although such small settlements rarely still have Bulgarian connections – they do not establish partnerships with 'random' Bulgarian municipalities; they specifically initiate twinning relationships with municipalities that were once the settlements from which Bulgarian horticulturalists came to Hungary.

Source: Author's compilation based on TÖOSZ and NSORB databases

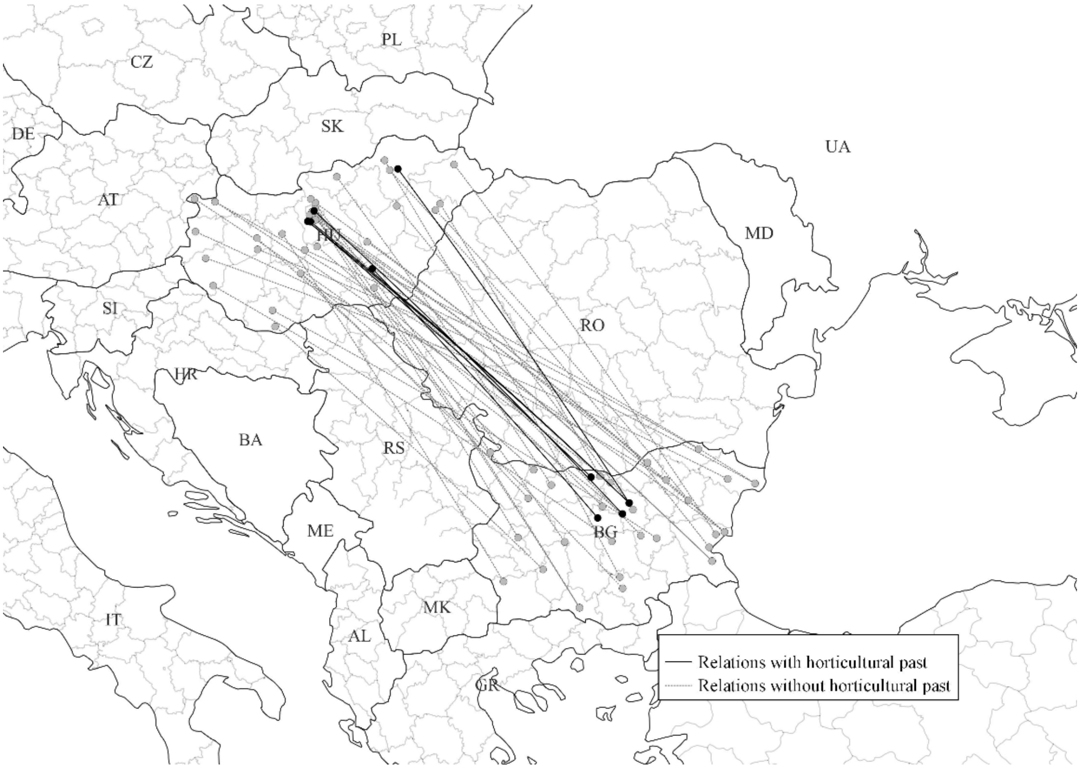

Figure 3 Twinning relations between Hungarian and Bulgarian municipalities based on the Bulgarian horticultural past

The twinning relations between municipalities where Bulgarian gardeners originated and later settled can be seen in the relations between Halásztelek – Polikraishte, Halásztelek – Nikopol, Felsőzsolca – Draganovo, Szentes – Sevlievo, Szigetszentmiklós – Gorna Oryahovica, and Zugló – Veliko Tarnovo. In Halásztelek (located in the south-western part of Pest county), the initial Bulgarian settlers established themselves in the area in the late 19th century. These families primarily specialised in vegetable cultivation and regularly transported the latter to markets in Budapest for commercial distribution. Over subsequent decades, the Bulgarian gardener community developed formal organizational structures and engaged not only in agricultural production but also in a range of cultural activities (Mlecsenkov, 2024). The municipality of Halásztelek has entered twinning relations with two Bulgarian settlements. In 1997, it established a partnership with Polikraiste with the intention of 'continuing and enhancing the long-standing friendship and traditions of kinship between the residents of the two villages', while with Nikopol (2002), the aim was to increase the number of mutual relations between the two settlements and to exchange opinions and experiences in many areas.[4] The relationship established with Polikraiste goes back even further. The need for this was formulated based on the still existing kinship relations of the Bulgarian gardeners living in Halásztelek, but the conclusion of the contract was a joint initiative of the two settlements. The basis for establishing the twinning relationship was therefore the establishment of a connection with the place of origin. The relationship with Nikopol was formed more recently and under external influence, as the then-Hungarian ambassador to Bulgaria raised the idea of cooperation between the two Danube settlements at an event in Polikraiste. In the last decades of the 19th century, Bulgarian gardeners gradually settled in the Miskolc area. In

[4] https://www.halasztelek.hu/halasztelekrol/testvervarosok

the period between the two world wars, the city was already surrounded by Bulgarian gardener communities, which appeared in several parts of the city (Rémiás, 2010). One of these surrounding settlements was Felsőzsolca, where the role of the current Bulgarian community is undeniable; the twinning relationship with Draganovo was established on 18 October 2008 on the initiative of the (formerly still functioning) national minority self-government 'because the parents and relatives of Bulgarian families living in Felsőzsolca come from that settlement, while at the same time there are still people living in Draganovo who once worked in our town as guest workers'.[5] Szigetszentmiklós identifies the Bulgarian gardeners as the origin of the twinning with Gorna Oryahovica since 'nearly 300 Bulgarian gardening families from the town and its surroundings have moved to Szigetszentmiklós and its surroundings', and the Bulgarian community is still an important player in the relations between the two municipalities. Their agreement was signed in 2004.[6] An interesting chapter in Zugló's (officially known as Budapest's 14th district) history involves Bulgarian gardeners, who played a significant role in shaping the district's horticultural landscape. During the late 19th and early 20th centuries, many Bulgarian immigrants settled in Budapest, bringing with them specialized knowledge of gardening and floriculture (Vukov, 2024). The twinning relationship between Zugló and Veliko Tarnovo is the result of the initiative of the local Bulgarian community, the heirs to the Bulgarian gardeners.[7] Szentes also paid tribute to Bulgaria's horticultural traditions and their impact on the settlement's development by concluding an agreement with Sevlievo (2022). The twinning relation was initiated by the Bulgarian side, and the agreement formalized the cooperation between the two cities, which 'began several years ago thanks to Bulgarian gardeners'.[8]

The intensity and depth of twinning relations, as well as the formalisation of cooperation in the initial period, depend mainly on local governments. Szentes and Sevlievo are still in this phase of cooperation, so, beyond the annual official meetings (which mainly involve visits by local government delegations), they have not yet been able to report on deeper local benefits. However, in Szigetszentmiklós and Halásztelek – where relations go back a relatively long time, and a Bulgarian minority self-government also operates – interviewees reported that the local governments played a role in initiating the processes, but now independent and direct connections exist between the various local groups and organizations. At the level of local governments, the relationship usually involves annual events, with these official visits providing a space and framework for the formation of other collaborations, which often include exchange programs of different local group, sports, children's camps, performances by artist groups, and creative camps, but there have also been examples of the submission of joint applications and participating in joint projects. The cultivation of the Bulgarian horticultural past, which forms the basis of twinning relations, also appears in the lives of the settlements and, occasionally, in municipal cooperation. Tributes to Bulgarian horticultural traditions include an annual tomato-growing competition organized by the Bulgarian minority self-government of Szigetszentmiklós, and the seed donation from Sevliovo to Szentes, but, of course, various symbols (monuments, public works) reminiscent of the past can also be mentioned here.

[5] https://felsozsolca.hu/varosunk/testvertelepulesek/#draganovo
[6] https://szigetszentmiklos.hu/testvervarosok/gorna-oryahovica-bulgaria
[7] https://www.zuglo.hu/veliko-tarnovo/
[8] https://www.szentes.hu/mult/testvervarosok/

6 Discussion and conclusion

In recent years, subnational international engagement — commonly termed paradiplomacy — has emerged as a focal point of scholarly and policy interest on a global scale (Mori, 2023). Twinning has become a vital tool for city diplomacy, enabling municipalities to act as independent, proactive actors in international relations worldwide. These partnerships extend beyond symbolic links and cultural exchange to economic cooperation and become practical channels for sharing knowledge on urban challenges such as sustainability, resilience, and inclusive growth. Sister cities, rooted in a history of post-war reconciliation, have evolved into channels for advancing sustainable development goals by addressing global issues locally and fostering international cooperation (Acuto, 2016). These partnerships allow cities to share best practices in sustainable urban development, leading to more effective approaches to climate resilience and environmental management.

Twinning is most often geographically determined and is mainly established between municipalities in neighbouring countries. Even within each state, there is a tendency to orient towards the geographically closest state. These general rules can, of course, be overridden by close, friendly relations between two states, their history, the relationship between minorities living in the territory of each state and their mother country, etc. The historical ties between Bulgaria and Hungary are not particularly strong, although the State socialist period can be seen as a kind of shared history. Twinning relations were, of course, established within the State socialist bloc, but they were mostly formal and subject to the approval of the central authorities. It also follows that these relations were dependent on the relationship between the two states, so that if this broke down, the cooperation had to be suspended (Süli-Zakar and Czimre, 2007). Although most of these artificial and largely protocol-based twinning relationships ceased to exist after the regime change, there are still some collaborations that date back to this period. The disintegration of relationships and the regime change in twinning are well illustrated by the fact that the 94 regional centres in Central and Eastern Europe typically do not establish cooperation with one another, accounting for only 10.8% of all relations (Kézai P. and Páthy, 2023).

After the change of regime, the opportunity arose for the established local governments to shape their international relations, including twinning relations, according to their own needs, characteristics, and interests. Minority self-governments at the national and local levels, established under the Minority Law in 1993, primarily perform cultural functions, but these organizations can also play a significant international, even diplomatic, role in connecting ethnic communities, and sometimes entire settlements, with the kin state or their specific localities. One form of this intraethnic connection is the official twinning established between (regional or) local governments. In most of the cases examined in the study, the initiating role of local minority self-governments can be demonstrated, and the Bulgarian twinning agreements concluded by the local government were clearly created under the influence of these actors. It is highly likely that the need for a connection with the kin state also underlies those twinning cooperations where the Bulgarian horticultural past is not decisive, but where a Bulgarian minority self-government or a Bulgarian community without an institutionalized form operates/operated in the settlement.

The size of the municipality is also a decisive factor in determining the number and direction of relations. Smaller municipalities tend to establish fewer contacts with geographically closer areas, while cities, especially large ones, tend to also seek cooperation with multiple states further afield. As far as Bulgaria and Hungary are concerned, there is a significant difference in the activities of the cities in the two countries. Hungarian municipalities are much more active than Bulgarians in this respect, even though Plovdiv almost leads the Central and Eastern European regional field with its 29 twin and partner city cooperations (only Lublin in Poland has more). Among Hungarian cities, Debrecen has the most contacts (19). The tendency of large cities to seek to establish links with many countries is also confirmed by the cooperation of the above-mentioned cities: Plovdiv and Debrecen have entered into cooperation with 21 and 17 cities, respectively (Kézai P. and Páthy, 2023).

The findings of this study underscore the persistent influence of historical migration and cultural heritage on contemporary local identities and inter-municipal relations. Although the demographic weight of the Bulgarian minority in Hungary has declined since the early twentieth century, its cultural and historical legacy continues to shape the symbolic landscape of several settlements. The persistence of Bulgarian–Hungarian twinning relations—though limited in number—demonstrates that cultural memory and ethnic heritage remain active drivers of municipal cooperation.

By integrating census data, historical documentation, and interviews, the research has revealed that former centres of Bulgarian horticultural activity have maintained a collective awareness of their ethnic past. This awareness has evolved from a tangible economic practice into an element of cultural identity, influencing present-day initiatives associated with cultural exchange and local diplomacy. Twinning partnerships, in this context, serve as institutionalised forms of cultural remembrance—mechanisms through which historical ties are reactivated and transformed into frameworks for international cooperation.

The analysis also shows that these partnerships are not purely symbolic. They provide local actors with practical means to engage in educational, cultural, and developmental projects that reaffirm shared heritage while aligning with broader European objectives of intercultural dialogue and regional integration. Thus, the study situates Bulgarian–Hungarian twinning relations within the wider paradigm of **heritage-based paradiplomacy**, where historical and cultural linkages underpin the dynamics of local international engagement.

6.1 Theoretical implications

The research represents a significant theoretical contribution as it is the first study of Bulgarian-Hungarian twinning in this field. This study makes a noteworthy theoretical contribution to the emerging scholarship on paradiplomacy and intraethnic municipal cooperation by uncovering the link between diaspora and kin state, historical migration patterns, cultural heritage, and contemporary local-level international relations. By situating the phenomenon of Bulgarian–Hungarian town twinning within the broader theoretical framework of ethnic-based transnational networks, the research extends the understanding of how historical ethnic linkages may evolve into institutionalised cross-border partnerships.

The findings demonstrate that town twinning is not merely a symbolic form of diplomacy but can also be conceptualised as a manifestation of heritage-based paradiplomacy, in which collective memory and shared identity drive municipal cooperation. This perspective enriches existing theories of paradiplomacy, which have often prioritised economic, political, or geographical determinants of local international relations, by introducing cultural-historical continuity as a distinct explanatory dimension.

Furthermore, the study provides an empirical contribution to the theoretical debate on ethnic diaspora engagement and identity maintenance in host societies, showing that the persistence of twinning relations between Hungarian and Bulgarian municipalities reflects an ongoing process of transnational identity reconstruction. This approach may represent a useful model for analysing other small, dispersed ethnic communities whose cultural practices continue to influence local diplomacy long after the original migration wave has ended.

6.2 Practical implications

From a practical standpoint, the study offers valuable insights for policymakers, local authorities, and cultural institutions involved in heritage preservation and municipal diplomacy. The Bulgarian–Hungarian case demonstrates that shared cultural memory can be transformed into a platform for sustainable local development. Municipalities can leverage historical and ethnic linkages to foster cross-border collaborations in areas such as education, tourism, agriculture, and cultural programming.

For Hungarian and Bulgarian municipalities, revitalising or establishing new twinning relationships rooted in shared heritage can enhance community identity, promote intercultural understanding, and attract EU funding through initiatives such as Interreg Europe, Creative Europe, or Europe for Citizens. The findings also highlight the importance of involving minority self-governments and diaspora organisations in local diplomatic activities to ensure inclusivity and authenticity in heritage representation.

Finally, the results have broader implications for the development of local-level cultural diplomacy strategies in Central and Eastern Europe. They demonstrate that even small ethnic groups, through the preservation and activation of their historical legacies, can contribute meaningfully to transnational cooperation and cultural exchange.

6.3 Limitations

While the study provides significant insights, several limitations must be acknowledged. First, the analysis relies partly on secondary databases (the Hungarian TÖOSZ and the Bulgarian NSORB databases) that, while comprehensive, may not fully capture informal or unrecorded twinning relations. There might be international relations between municipalities that are not registered in these databases.

Second, the research focuses on a single ethnic group and country context, which limits the generalisability of the conclusions to other minority populations or regions. Additionally, the study did not explore in depth the **longitudinal evolution** of twinning relations or the socio-political factors influencing their continuity.

6.4 Future research directions

Building upon these findings, future research could pursue several directions. Studies using fieldwork, participant observation, or comparative network analysis could provide a more nuanced understanding of these dynamics.

Other studies could explore the similarities and differences between twinning relations in Central and Eastern European countries. Analysing data on twinning between countries could improve our understanding of paradiplomatic relations, how they develop, and how local governments can successfully network and connect. Such research would deepen theoretical understanding while helping create practical tools for designing inclusive and resilient models of local international cooperation.

6.5 Conclusion

This study has demonstrated that the historical legacy of Bulgarian horticultural settlers in Hungary continues to influence both local identity and contemporary municipal diplomacy. By uncovering the enduring cultural and institutional linkages between Bulgarian and Hungarian settlements, it provides empirical evidence that heritage remains a vital dimension of local international engagement.

Theoretically, the study advances the notion of heritage-based paradiplomacy, positioning cultural memory and ethnic identity as dynamic forces shaping transnational cooperation. Practically, it underscores the potential of cultural heritage to serve as a foundation for sustainable local partnerships and community development.

Although limited in scope, the study opens new pathways for understanding how small ethnic communities contribute to the cultural and diplomatic landscape of Europe. Recognising and supporting these heritage-based interactions can not only preserve shared histories but also foster enduring networks of cooperation, dialogue, and mutual enrichment in an increasingly interconnected world.

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