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**Bureaucratic reputation through the eyes of different audiences:
Exploring the reputational dimensions valued by different audiences
of EU regulatory agencies**

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Universiteit Leiden

Bureaucratic reputation through the eyes of different audiences

Exploring the reputational dimensions valued by different audiences of EU regulatory agencies

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Abstract

Today, reputation management is of great importance to public regulators. As a positive reputation can be a stepping stone for regulatory legitimacy, public regulators increasingly attempt to cultivate a positive reputational image in the eyes of their audiences. However, while an abundance of research has been conducted on the reputational dimensions emphasized by EU agencies, little investigation has been done on what reputational dimensions its *audiences* consider when they assess the reputation of these bodies. Therefore, with the use of Carpenter's (2010) multidimensional reputational framework, this work examined what reputational dimensions are valued by different audiences of EU regulatory agencies, specifically that of the European Food Safety Authority (EFSA). It tested two competing expectations. One expectation supposed that different audiences value different reputational dimensions, while the other regarded that different audiences value the same dimension. To inform these two expectations, fourteen semi-structured interviews were performed with representatives of NGOs, businesses and industry associations, academic organizations, and national regulatory authorities (NRAs). In addition, a qualitative content analysis of the audiences' policy reports directed towards EFSA was performed. From this, this work found that different audiences valued different reputational dimensions, which also lead to several contradictory demands among the audiences. In addition, it found that several causal mechanisms played a role in explaining these different emphases on reputational domains, such as the resources and the structure of the audiences' organizations and their professional interests and roles. Finally, this work provides several theoretical, methodological, and policy-relevant implications that are of relevance to both researchers in the bureaucratic reputation literature as well as practitioners of reputation management working in regulatory settings.

Keywords: bureaucratic reputation, reputation management, legitimacy, EU agencies, audiences.

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Introduction

Organizational reputation is an important asset for regulatory agencies. This can be seen as “the set of beliefs about the unique or separable capacities, roles, and obligations of an organization, where these beliefs are embedded in audience networks” (Carpenter, 2010: p. 33). Having a positive organizational reputation is a valuable asset for these agencies as it can, for example, increase their legal authority, autonomy, and regulatory power (Carpenter & Krause, 2012: p. 33; Gilad, Maor & Bloom, 2013: p. 455). It is also seen as a primary source of legitimacy for such agencies as it “informs their capacity to act” (Busuioc & Rimkutė, 2020: p. 549). Additionally, a positive reputation can shield agencies from reputational threats such as scandals or low performances which can lead to severe budgetary or auditing punishments for the agency if this reputational shield is not present (Maor, 2014: p. 20). Finally, a good reputation can increase public support for the agencies’ policies (Busuioc & Rimkutė, 2020: p. 529). Given all these benefits of a solid reputation, regulators are “status-conscious” (Carpenter & Krause, 2012: p. 43) organizations that carefully aim to construct and protect their reputations using various reputation management strategies (Carpenter & Krause, 2012: p. 28; Maor, 2014: p. 17; Rimkutė, 2020a: p. 1639).

Importantly, the reputation for public organizations is multifaceted (Carpenter, 2010; Overman & Busuioc, 2020: p. 416). This means that a public organization can have more than one reputation, each with specific attributes (Carpenter, 2010: p. 46). This is in contrast with private corporations, where the perceptions of audiences are instead aggregated and focused mainly on the financial performance or the competitive position of the firm (Overman et al., 2020: p. 416; Bustos, 2021: p. 2). One model that can be employed for the multi-dimensional reputation of public organizations is that by Carpenter (2010: p. 46). This model argues that a public organization has four different types of reputation (Carpenter, 2010; Bustos, 2021: p. 9) *a performative reputation*, which concerns the effectiveness and efficiency of the organization in achieving established objectives, 2) *a moral reputation*, which concerns the ethical behavior of the organization, 3) *a technical reputation*, which regards the scientific, methodological and analytical capacities of the organization, and 4) *a procedural reputation*, which concerns how the organization follows accepted rules and norms in different situations. It has been argued that audiences of regulatory agencies can value these “reputational dimensions” (Overman et al., 2020: p. 417) in different ways, as “what one audience sees is not necessarily what another audience sees” (Carpenter, 2010: p. 34).

Given that organizational reputation is a set of beliefs socially constructed by different audiences (Carpenter, 2010: p. 45), it would be logical to assume that one needs to explore what reputational dimensions are most valued by different audiences. In the context of EU regulatory research, however, little research has been done on this matter. So far, research has mainly been done on the behavior of the *agencies*. Namely, it has been examined which reputational dimensions are stressed by EU regulatory agencies (Rimkutė & de Vos, 2020), why they use particular strategic communication strategies (Rimkutė, 2018; Rimkutė, 2020a; Busuioc & Rimkutė, 2020), and in what ways they react to public allegations (Gilad et al., 2013). In response to this omission, it has been argued by bureaucratic reputation scholars that more research should focus on the *audiences’* side (Bustos, 2021: p. 10). Some that followed this line of thinking have, for example, examined the influence of individual factors such as age, gender, and race on the perception of organizational reputation (Lee & Van Ryzin, 2020). This research, however, was conducted in the context of US regulation, and it conceptualized reputation in a unidimensional fashion (in terms of general favorability) rather than in a multidimensional one (Lee & Van Ryzin, 2020). Others did examine the

audiences' perceptions of the multidimensional reputation of an EU agency (Overman et al., 2020), but did not examine the *standards* of reputational assessments used by audiences and *why* audiences use these. Finally, in the bureaucratic reputation literature, there have been especially few studies done that investigate *multiple audiences*, as most of them have focussed only on one specific audience of an agency (Bustos, 2021: p. 9). In sum, an academic gap in the literature on bureaucratic reputation that needs to be filled concerns which types of reputational dimensions are stressed by a multitude of audiences of EU regulatory agencies, and also why they do so.

This is where this research comes in. With the use of semi-structured interviews and qualitative content analysis, this work aims to be the first in exploring what reputational dimensions are emphasized by different audiences of EU regulatory agencies and why. The four types of audiences that are being investigated are the NGOs, the businesses and industry associations, the academic experts, and the national regulatory agencies (NRAs). All these audiences examine the regulatory work of one agency: the European Food Safety Authority (EFSA). From this, it is investigated if these actors indeed differentially emphasize reputational dimensions (and if so, how?), or rather, if they emphasize the same reputational dimension. All in all, this leads to the following research question: *How does audience heterogeneity account for the types of reputational dimensions that are emphasized by different audiences of EU regulatory agencies when they assess the reputation of these organizations?* An answer to this question can also provide more insights into the (possible) contradictory demands of multiple audiences, a claim which often has been made in the bureaucratic reputation literature (Carpenter, 2010: p. 59) but which has been little explored in-depth. Finally, this research question makes it possible to delve into the causal mechanisms that can explain the particular emphases on reputational dimensions.

This work does not only have academic relevance, but also practical relevance. Namely, EU regulatory agencies are increasingly concerned about their reputation (Rimkutė, 2020b: p. 389-391). This is because these agencies are now being assessed within a culture of increased transparency demands, declining trust in government, public scrutiny, blame games (Rimkutė & de Vos, 2020; Gilad et al., 2013: p. 451), and an increasingly critical citizenry (Lee & Van Ryzin, 2020: p. 184). In response to this, EU regulatory agencies are attempting to improve their organizational reputation by devoting more attention to the development of communication strategies and by making use of reputation-management consultants (Waeraas & Maor, 2014: p. 1). Thus, public managers at EU regulatory agencies are most likely interested in whether their reputation management strategies work. "Successful" and "effective" reputation management has been mentioned in the organizational reputation literature (Busuioc & Rimkutė, 2020: p. 549), but there is little investigation of its extent and relevant factors. Given that the potential success of reputation management is relational (Christensen & Gornitzka, 2019: p. 886) and that audiences are the "primary reference for reputation management" (Bustos, 2021: p. 5), this work maintains that one way to explore this matter is by gaining knowledge on the reputational dimensions stressed by relevant audiences. Indeed, what affects an agency's reputation is behavior that is not coherent with audiences' expectations (Maor, 2016, p. 83). For example, an agency might stress and improve its performance track record while audiences' expectations are focused on whether the agency is making morally right decisions (Maor, 2016: p. 83). This can result in the possibility that managers of public organizations are "steering in non-astute directions" (Overman et al., 2020: p. 416) as they emphasize different values than those held by their audiences. If there is more detailed knowledge on the expectations of these audiences and why they hold these, regulatory agencies can become more equipped in conveying specific information to specific audiences according to their

expectations (Bustos, 2021: p. 10). In other words, reputation management strategies by EU regulatory agencies can become more effective as their strategic communications and behavior will be specifically tailored to different audiences and subsequently more congruent with the adhered values of these audiences.

The thesis is structured as follows. First, the theoretical framework defines key concepts for this research and also provides two competing expectations about which reputational dimensions will be emphasized by which actors. Second, the research design justifies why EFSA and these particular audiences were chosen and it also explains why the particular methodologies were employed. In addition, this section operationalizes the four reputational dimensions as originally formulated by Carpenter (2010: p. 46). Third, the results section shows that indeed different audiences emphasize different reputational dimensions, which also result in several contradictory demands among these audiences as argued by Carpenter (2010: p. 59). Finally, the discussion section outlines the theoretical, methodological, and practical implications of this work and also shows the limitations of this research and possibilities for future research in this field.

Theoretical framework

The theoretical background is structured in the following way. First, it elaborates on two central concepts in this work: “audiences” and the four reputational dimensions originally formulated by Carpenter (2010: p. 46). It is important to elaborate on these concepts because this work scrutinizes the effect of the type of audience (the independent variable) on the type of reputational dimension valued by the audience (the dependent variable). Then, it provides expectations on what different audiences might value. It provides two competing expectations. The first is that different audiences will emphasize different reputational dimensions, which can also lead to contradictory demands (Carpenter, 2010: p. 59). This expectation is subdivided into the expectations that the NGOs will emphasize the moral dimension, that business and industry actors will highlight the performative dimension, and that both the academic experts and the members of NRAs will stress the technical dimension. The second expectation, which clashes with the first expectation, is that the different audiences all value the same dimension. Two reasons for this expectation are the possible dominance of particular values in today’s society and that audiences could solely focus on the mandate of the agency (and therefore only consider one type of reputational dimension when assessing the reputation).

Audience: the independent variable

An audience can be seen as an individual or a collective that observes a regulatory organization and can judge it (Carpenter, 2010: p. 33). Audiences are very diverse (Carpenter & Krause, 2012: p. 28) and consist of two main types: *formal* and *informal* audiences. Formal audiences are institutional actors who have formal responsibilities such as delivering public services, creating policies, and scrutinizing agencies (Boon et al., 2020: p. 295). Such audiences include, for example, bureaucrats, legislators, or other governmental agencies like regulators and audit agencies (*idem*). In the context of the EU, such actors include, amongst others, the European Parliament and the European Commission. Informal audiences are not political-institutional actors but they are still directly or indirectly involved with the regulatory organization and they therefore also actively evaluate the agency. Such actors include civic associations, business organizations and academic experts (Bustos,

2021: p. 8). Given these definitions, it can be said that this work examines both formal audiences in the form of national regulatory agencies (NRAs) and informal audiences such as the NGOs.

Additionally, it needs to be stressed that regulatory agencies are dependent on these different audiences. For example, policies of regulatory organizations have to be complied with by citizens, experts and business organizations can provide expertise to regulators, and (mainly) governmental bodies provide regulators with (monetary) resources so that they can fulfill their mandate (Busuioc & Rimkutė, 2020: p. 548). These audiences are also important as they can determine the amount of authority the regulators are granted (Carpenter, 2010: p. 33). Hence, one way regulatory agencies can secure these different resources from its audiences is through successful reputation management. The effectiveness of this strategy, however, depends on the ability of the regulator to determine what its different audiences value most and to adapt its communications and behavior to these values. Indeed, for these audiences, the perceived reputation can be seen as the “intellectual, emotional and behavioral response as to whether or not the communications and actions of an organization resonate[s]” (Bass, 2018: p. 3) with the audiences’ values.

The type of reputational dimension: the dependent variable

To provide a general framework for these different values, this thesis borrows from the framework created by Carpenter (2010: p. 46). This framework has been widely used in the bureaucratic reputation literature to conceptualize different reputational dimensions (Bustos, 2021: p. 5) and it is therefore also applied in this work. Originally, this framework was created to identify the different reputational dimensions which regulatory organizations can stress in their communications (Carpenter, 2010: p. 46). However, like the work by Overman et al. (2020), this work maintains that they can also be applied to the reputational dimensions that can be stressed by relevant *audiences* for two reasons. First, these four dimensions embody many of the potential aspects that can be deemed important by people when they evaluate public sector agencies, such as whether the agency is producing high-quality policy outputs, showing integrity and being transparent, and following accepted decision-making procedures (Overman et al., 2020: p. 419). Second, using the same dimensions both for regulatory agencies and for their audiences is practical for academic and policy-relevant purposes as it can help identify possible (mis)matches between the dimensions stressed by regulators and their audiences. Having clarified this, the four reputational dimensions are as follows.

First, the performative reputational dimension generally concerns the quality of decisions and policies by a regulatory organization (Overman et al., 2020: p. 417). If audiences greatly value this dimension, they will deem it important that the agency does its job effectively and efficiently (which also concerns the speed of the decision-making) (Carpenter & Krause, 2012: p. 27). If the regulatory organization also values a high performative reputation, it will try to show that it delivers on its mandate effectively and therefore it will aim to show that it has a unique value to its audiences (Overman et al., 2020: p. 417). In addition, a regulatory organization showing its “muscles” by emphasizing its ability to exercise its regulatory power vis-à-vis particular audiences, for example by stating that businesses need to comply with the regulatory policy, also falls under the performative dimension (Rimkutė & de Vos, 2020: p. 27).

The second dimension is technical. If relevant audiences deem this dimension as the most important, they will focus on whether the organization has an adequate amount of technical (and

scientific) skill, analytical capacity, and methodological competency (Overman et al., 2020: p. 417). They will focus on whether the agency is skilled enough to deal with complex environments, something which stands alone from its performance (Carpenter & Krause, 2012: p. 27). Some elements that fall under this are whether the agency's employees are skilled in their profession (professionalism) and if the agency is at the forefront of scientific innovations (Overman et al., 2020: p. 417). If the regulatory agency wants to have a high technical reputation, it will emphasize its scientific and technical conduct (Rimkutė, 2020a: p. 1639). Importantly, the performative and technical dimensions are not the same: highly perceived technical ability does not necessarily mean there is also the perception that the organization fulfills its mandate adequately (though this can help).

The third dimension is legal-procedural. If relevant audiences deem this dimension important, they will focus on the justness of the decision-making processes of the organization. In other words, the audiences will focus on the question: Does the agency follow generally accepted rules and norms, regardless of the quality of its decisions (Carpenter & Krause, 2012: p. 27)? Elements that will be the focus of audiences will be whether the agency works fairly and does not make arbitrary decisions, whether it uses a good procedure for complaints, whether it is independent of the industry, and whether it allows stakeholders to participate in consultations (Overman et al., 2020: p. 419). If regulatory agencies deem this dimension as important, they will attempt to send communicative signals that emphasize they are following due process.

The final dimension is moral. If relevant audiences attach the most value to this dimension, they will focus on whether the agency is acting in an ethically approved manner and whether it commits to protecting prevailing social values (Rimkutė, 2020a: p. 1639). In short, audiences will focus on the following questions: Is the agency compassionate, flexible, and truthful (Carpenter, 2010: p. 46)? Does it aim to protect the interests of its constituencies, clients, and members (Carpenter, 2010: p. 46)? Does it attempt to safeguard prevailing social values (Rimkutė & de Vos, 2020: p. 34)? Finally, does it work transparently and confidentially (Overman et al., 2020: p. 419)? If regulatory agencies also stress this dimension, they will send communications that signal that the agency is showing that it cares about social values in a way beyond what its mandate requires it to do (for example if EFSA denounces particular human rights violations) and that it is, for example, transparent about its work.

Finally, it should be highlighted that the concept of reputational dimensions should not be confused with that of interests. For example, while two audiences can have conflicting interests, they can still believe that the performative reputational dimension is the most important one. In other words, even though different audiences might disagree on what the objectives of an agency should be, they can both focus on whether the agency is fulfilling its goals rather than whether the agency cares for the public interest. Thus, a reputational dimension emphasized by an audience can be seen as a *lens* or *frame* through which it evaluates the agency, rather than the actual content of the evaluation.

Expectations

Which reputational dimensions can be expected to be stressed by different audiences? A first idea is that different audiences and hence people from different professional backgrounds will have different lenses through which they view the world. This coincides with a major idea in bureaucratic reputation theory, namely that different audiences will have different expectations and therefore

stress different dimensions of reputational success (Maor, 2014: p. 1). This is because the nature of the audience could influence the type of standards held by the audience, which in turn can impact the audience's assessment of the reputation (Bahr et al., 2010: p. 3). In a study on the audiences' perception of corporate reputation, for example, it was found that different groups "differentially emphasized domains of corporate reputation" (Bahr et al., 2010: p. 9). For example, customer groups desired quality of service, responsiveness, and commercial responsibility, whereas supplier groups highlighted dimensions such as ethics and transparency (Bahr et al., 2010: p. 9). Moreover, Shenkar and Yuchtman-Yaar (1997) and Dowling (2006) have similarly argued that reputational attributes do not have equal relevance for different audiences as different reputational facets are likely to matter to different stakeholder groups. All in all, this leads to the following expectation regarding the reputational dimensions valued by audiences of EU regulatory agencies:

Expectation 1: Different audiences of EU regulatory agencies will emphasize different reputational dimensions.

Importantly, it needs to be highlighted that if an audience emphasizes a particular reputational dimension, this does not mean that the audience does not value other reputational attributes. In other words, if an audience emphasizes the technical reputational dimension, this would not mean that the performative dimension is completely disregarded. Rather, it means that the audience *mostly* values the technical reputational dimension relative to the other dimensions. Having clarified this, what can we expect the different audiences to emphasize?

First, there are the NGOs. There is a lack of consensus that defines such actors (Teegen et al., 2004: p. 466), but in this work the following definition will be used as it includes a broad range of NGOs (both advocative and operational NGOs): "private, not-for-profit organizations that aim to serve particular societal interests by focusing advocacy and/or operational efforts on social, political and economic goals, including equity, education, health, environmental protection, and human rights" (Teegen et al., 2004: p. 466). As this definition already hints at, one important way in which such actors can be seen is as "value guardians" (Salamon, 1993: p. 16). This means that these actors mobilize interests in a more grassroots and bottom-up fashion and therefore aim to represent vulnerable groups in society. Though the values they advocate can differ from climate change to racial issues to democratic promotion, they are often "advocating causes and taking positions on humanitarian and ethical grounds" (Weidenbaum, 2009: p. 148). In addition, a primary goal of such organizations is to hold political institutions (and businesses) accountable for their social responsibility (Weidenbaum, 2009: p. 147). Because of this, this work expects that these actors will focus on protecting the public interest and hence the moral dimension:

Expectation 1a: Actors representing non-governmental organizations (NGOs) will emphasize the moral reputational dimension when assessing the reputation of a regulatory agency.

Second, there are the business actors. A business can be seen as "an organization or entity that sells goods or services for a profit" (Accounting Dictionary, n.d.), making the profit element an important characteristic that distinguishes such organizations from NGOs. Business actors can be expected to focus on the performative dimension for two reasons. First, a primary goal of business actors is to reach particular objectives efficiently to obtain financial or competitive goals. Hence, the corporate ethos greatly values mechanisms such as Key Performance Indicators (KPIs), which are used by

enterprises to monitor their performances and the effectiveness of their business strategies. In addition, such organizations are often greatly focused on saving costs in achieving their goals through activities like budgeting. A focus on such practices can be expected to spill over in the focus of their perception when they assess the reputation of regulatory agencies.

Another reason why business actors might value the performative dimension the most is that the standards set by regulation can greatly affect business actors (Lodge & Wegrich, 2012: p. 12). Regulation can potentially pose benefits to companies, for example by creating frameworks in which commercial transactions take place at lower cost (OECD, 2009: p. 1-3). However, there can also be negative constraints on business actors particularly through “regulatory burdens” (Lodge & Wegrich, 2012: p. 12). If such burdens are caused by regulation, it can mean that the regulation prioritizes expensive and ineffective technologies and induces high costs for businesses (Lodge & Wegrich, 2012: p. 12). Businesses actors often complain about “red tape” and unnecessary administrative and costs imposed by regulation (OECD, 2009: p. 1), and hence it can be expected that they will greatly value the performative dimension that highlights the degree of efficiency and effectiveness of the regulator in attaining its goals (Rimkutė & de Vos, 2020: p. 27).

It must be mentioned that corporate social responsibility (CSR) is on the rise, which entails the self-regulation of businesses so that they are more socially accountable. This can potentially make business actors also emphasize the moral dimension. However, this work still expects that the performative dimension will override the moral dimension due to the deep-rooted focus on reaching financial objectives in an efficient manner which is an intrinsic element of the nature of businesses. The same expectation can be made for industry associations: because these actors represent the interests of businesses, these actors will also value the performative dimension as this is valued by their constituencies. All in all, this leads to the following expectation:

Expectation 1b: Actors representing business organizations and industry associations will emphasize the performative reputational dimension when assessing the reputation of a regulatory agency.

Third, there is the scientific community that scrutinizes the activities of regulatory agencies. For the purpose of this work, this audience will be conceptualized as people who engage in scientific practices. Their values regarding scientific work, in turn, make for the expectation that these actors will strongly value the technical dimension. Namely, such values can include a desire for high technical and scientific standards in different stages of both outputs and scientific methodologies (such as objectivity and adequate evidence selection, analysis, and reporting) (Rimkutė & de Vos, 2020: p. 25). Such values in the professional life of academics make it likely that they will focus more on the technical dimension and less on (for example) the moral dimension which is less related to the scientific rigorousness of regulatory outputs.

Fourth, there are the national regulatory authorities (NRAs). The actors that represent these bodies can be seen as professional peers of the members of European regulatory agencies. This is because these actors often conduct similar specialized and technical work in their roles. For example, in the area of food safety, NRAs (like the Netherlands Food and Consumer Product Safety Authority) also engage in technical activities such as hazard- and risk analyses (Riviere & Buckley, 2012). In addition, NRAs deem it important in their professional tasks to be informed by science when they make their regulations (Riviere & Buckley, 2012). They also desire to be informed about an expanding evidence base and new science to make their regulations better (Riviere & Buckley, 2012). All in all, because actors representing NRAs are professional peers of EU agencies and

therefore have similar scientific values and tasks, it can be expected that they will (like the academics) also focus on the technical performance of EU agencies. Hence, the following expectation can be made about the academics and the NRAs:

Expectation 1c: Actors representing the academic organizations and the NRAs will emphasize the technical dimension when assessing the reputation of a regulatory agency.

Finally, if different audiences indeed value different reputational dimensions, what might be some potentially competing demands as highlighted by Carpenter (2010: p. 59) and Busuioc and Rimkutė (2020: p. 548) that can result from differential emphases on the reputational dimensions? In short, these authors argue that different audiences have competing demands when it comes to the work of regulatory agencies. More specifically, one possibility is that there are clashes between the emphases on the technical and legal-procedural dimensions. For example, if one audience greatly values the independence of the experts of a regulatory agency (the legal-procedural dimension), this can potentially clash with the demand of another audience that values the highest level of expertise of these experts (the technical dimension). Namely, a work by Ossege (2014) has shown that members of EU regulatory agencies have experienced problems in recruiting high-level experts after their conflict of interest (Col) rules were made more strict (to ensure the independence of these experts). In short, members of these agencies believed it was difficult to recruit experts that did not have funding relations from industries (which could lead to Col) as many of the qualified experts had some previous (professional) relations with industries (Ossege, 2014: p. 414). In addition, cuts in public budgets for research have made academic funding by private companies even more prominent (Horel & CEO, 2013: p. 4-6), affirming the ideas of Ossege (2014). In short, this can be one example of a conflicting demand as highlighted by Carpenter (2010: p. 59) which can result from differential emphases on reputational dimensions held by the audiences. Throughout this work, other similar tensions between the emphases on reputational dimensions and the consequences this has on different audiences' expectations from regulatory agencies will be explored.

Competing expectation

The first expectation can also be challenged by a competing expectation. The idea held by bureaucratic reputation scholars, which is that different audiences will stress different reputational dimensions because of their heterogeneity (Carpenter, 2010: p. 34), can be criticized and countered with the expectation that different audiences will stress the same reputational dimension regardless of their differences. In other words, it could be that the NGOs, the business actors, the academics and the NRAs all value one and the same reputational dimension.

Why could different audiences potentially stress the same reputational dimension? This could be the case for the following reasons. First, it is possible that all the audiences only value the performative dimension. This general pattern might exist among different audiences given the current dominant societal demands from regulatory agencies with respect to performance measurement, performance reporting, and the demonstration of efficiency (Busuioc & Rimkutė, 2020: p. 566). To illustrate, the European Parliament has been increasingly urging EU agencies to supply KPIs and information on results (Busuioc & Rimkutė, 2020: p. 566; Busuioc, 2013), something which could reflect a dominant societal focus on the performative dimension. Furthermore, this potential societal focus on the performative dimension is possible given the rise of New Public

Management (NPM) in different governmental contexts. This style of government also emphasizes performance and efficiency, and its rise could have been a response to the performative dimension being greatly valued by a multitude of societal actors.

There are also other potential reasons. Second, it is possible that all audiences only value the moral dimension. This could be due to the increased transparency demands being placed on public organizations (Rimkutė & de Vos, 2020: p. 2; Gilad et al., 2013: p. 451). Third, it might be the case that all the different audiences only stress the technical dimension concerning the regulatory agencies. This can be because different societal actors could only focus on the mandate of the agency and judge the reputation of the agency on the basis of whether its conducted activities are in line with its mandate. Given that the *raison d'être* of regulatory agencies is to perform technical duties (Rimkutė, 2020b: p. 385), different societal actors could only consider that these agencies perform their technical tasks adequately as they solely focus on the mandate. All in all, these reasons lead to the following counter supposition to the first main expectation:

Expectation 2: Different audiences of EU regulatory agencies will emphasize the same reputational dimension when assessing the reputation of a regulatory organization.

Research design

To explore these two competing expectations, the research design section has been structured as follows. First, it briefly explains what EFSA is and why this specific agency was chosen to investigate. Then, it justifies why the specific audiences were chosen. Moreover, it highlights the two main methods that were used to investigate the research question (semi-structured interviews and qualitative content analysis) and it justifies these choices. The next section shows how the reputational dimensions were operationalized and it justifies the chosen method of operationalization. Finally, the coding practice process is elaborated upon.

Case: The European Food Safety Authority (EFSA)

What is the European Food Safety Authority (EFSA) and what does it do? The primary role of EFSA is to provide and communicate independent scientific advice on existing and emerging risks associated with the food chain (Europa, 2021). Their mandate covers many areas: food and feed safety, nutrition, animal health and welfare, plant protection, and plant health (Europa, 2021). Their advice informs European laws and policymaking and is thus often requested by the European Parliament and the European Commission. EFSA's work is led by a scientific committee and ten panels that are made up of leading scientists in the discipline of food safety (Europa, 2021).

This agency was chosen for two main reasons. The first reason why EFSA was chosen was that the multitude and diversity of its audiences made sure that the prominent gap in the bureaucratic reputation literature could be addressed, namely an analysis of the expectations of multiple audiences of regulatory agencies and not only of one audience (Bustos, 2021: p. 9). This is because EFSA has many different audiences who are affected by the activities of the agency or are related to it in particular ways. For example, national regulatory authorities give EFSA strategic advice on scientific issues and are the main contributors of experts to EFSA (EFSA, 2021a). Moreover, there are consumer organizations that want to protect the safety of food and business organizations that want to sell particular products or medicines that first need to be approved by

EFSA for safety reasons. In short, all these actors are eager to evaluate EFSA's activities as the work of the agency affects them or their constituencies. All in all, the grand scope and the great variety of EFSA's audiences made EFSA a good regulatory body to address the research gap regarding the perceptions of *multiple* audiences.

Second, EFSA is an interesting regulatory organization from the perspective of bureaucratic reputation as it is one of the most active EU agencies in the area of reputation management. Indeed, it has been found that EFSA is "the most strategic [EU agency] in cultivating its reputation" (Rimkutė, 2020b: p. 397) as it greatly uses strategic reputational keywords in its communications directed to its external audiences (Rimkutė, 2020b: p. 397). This is in contrast with other agencies such as the Institute for Security Studies (EUISS) which hardly refer to organizational reputation keywords (Rimkutė, 2020b: p. 397). Hence, this active strategic reputation attitude gives EFSA great relevance to the scholarly field of bureaucratic reputation, making this the second reason why EFSA was chosen.

Finally, *only* EFSA was chosen because this controlled for other variables that could affect the type of reputational dimension valued by audiences. In this design, all the actors scrutinize the same agency, and hence the main difference between them is their profession and in turn their relation with EFSA. If audiences of multiple agencies were chosen, other variables could have interfered with the explanation of why audiences value particular reputational dimensions. Examples of such interfering variables could have been the different mandates of the agencies, the different levels of performance by the agencies, and the different degrees of salience of the agencies. Choosing only EFSA ensured that such variables could not play a role and that the crucial difference between the cases (the audiences) was the audience heterogeneity in terms of their professions.

The Audiences

Only these particular audiences were chosen for several reasons. First, they were relevant from a theoretical standpoint, given that little research has been performed in the bureaucratic reputation field on the reputational emphases by these audiences (Bustos, 2021: p. 9). Second, studying these audiences also had practical significance, given that EFSA itself views these actors as relevant audiences as they are all included in EFSA's list of accredited stakeholders (EFSA, 2020). One possible reason for this is that these actors have important resources which EFSA can use. First, NGOs can play the important role of an interlocutor of the voice of citizens, which can aid EFSA in legitimizing their assessments. Second, business actors need to be involved in stakeholder processes to increase their compliance with the assessments of EFSA. Third and finally, academic experts and NRAs can provide great scientific support to EFSA. Thus, the theoretical relevance of these audiences and their relevance for EFSA were the two main reasons why these audiences were chosen.

It must, however, also be explained why particular audiences were left out. First, the most important and noticeable omissions are the institutional actors of the EU. These actors are highly relevant for EFSA's reputation management given the important role they play for EFSA's work. For example, the European Parliament, a formal actor, is the principal of EFSA and hence determines EFSA's mandate and budget. While it was attempted to set up interviews with members of both the Parliament and the Commission, this proved to be highly difficult given the time constraints of these actors which in turn made these actors decline all interview requests. Second, (random) citizens were left out as this would have required large-scale surveying which, in addition to the other

methods employed, would have been unfeasible for the scope of this project. Also, citizens have fewer resources to play an influential role in determining the reputation of regulatory agencies than the above-mentioned actors and thus can be seen as a less relevant actor for reputation management purposes. Finally, citizens do not have as much close contact with EFSA as other audiences like NGOs and business actors, and thus they are likely to know EFSA less well. This would have made it more difficult for them to assess the reputation of EFSA, which makes for the final reason why the general citizenry was not studied.

Method one: Semi-structured interviews

The main methodology employed was semi-structured interviews. Interviews were suitable for the research question as they explore people's experiences, opinions, and perceptions (Halperin & Heath, 2017: p. 290). Hence, they were deemed the best tool to explore which reputational dimensions different actors perceive as important. Specifically, semi-structured interviews were used instead of structured or unstructured interviews. Namely, structured interviews are generally of a more standardized fashion and include simple and short questions (Halperin & Heath, 2017: p. 290). This type of interviewing does not allow for the exploration of people's perceptions in the same in-depth manner as semi-structured interviews do. Second, unstructured interviews are more suitable for ethnographic research (Halperin & Heath, 2017: p. 159), which is a type of research that did not align with the nature of this research question. Finally, semi-structured interviews allowed for probing which, given the relatively novel and exploratory approach of this work, worked well as it gave interviewees room to bring up new and different ideas which could not have been retrieved in a more structured fashion.

Interviews: Sampling

The participants were sampled in a purposive manner (Ritchie et al., 2014: p. 113-116). Purposive sampling is a non-probability sampling strategy that intentionally selects the participants based on certain criteria (Ritchie et al., 2014: p. 113). In this work, the participants were selected on the criterion of whether they were accredited stakeholders of EFSA. In line with the ideas of Overman et al. (2020: p. 423), only audiences that were close to the organization (for example through the participation of stakeholder meetings) were selected as "regulatory image comes into sharper focus for stakeholders who have more interactions with the organization" (Overman et al., 2020; p. 423). More specifically, a stratified purposive sampling strategy was employed (Ritchie et al., 2014; p. 114). This approach aims to select a sample in which the interviewees are fairly homogeneous (being a stakeholder) but also display variation (Ritchie et al., 2014: p. 114). Because it was important for this research that the different types of audiences were interviewed, the stratified purposive sampling approach was suitable.

Participants were recruited through e-mail. In this e-mail, the research project and its goals were mentioned as this was in line with research integrity standards (Ritchie et al., 2014: p. 141). Once the member agreed to be interviewed, a meeting was set up either via Skype, Zoom, or Microsoft Teams. The used medium depended on the preference of the interviewee. One interviewee of the Federation of Veterinarians of Europe was not able to participate in an in-person interview, and therefore the interview was conducted via e-mail. Finally, this research aimed to follow standard ethical practices in qualitative research (Ritchie et al., 2014: p. 78). For example,

members had to provide informed consent to the interview. Also, the interviewees were allowed to stay anonymous, and permission to record the interview was granted by all the participants.

The interviewees were as follows. First, regarding the NGOs, three representatives of the following organizations were interviewed: the European Consumer Organization (BEUC, consumer organization), the European Community of Consumer Co-operatives (Euro Coop, consumer organization), and the Federation of Veterinarians of Europe (FVE, which represents veterinary organizations). Regarding the business and industry association actors, five representatives of the following organizations were interviewed: the Imaging and Printing Association (I&P Europe), PlasticsEurope (association of plastics manufacturers), AnimalHealthEurope (an association representing veterinary medicines manufacturers), HuvePharma (a pharmaceutical company), and Prospero Management (which represents the European Biostimulant Industry Council or EBIC). Regarding the scientific community, three representatives of the following organizations were interviewed: the European Chemical Society (EuChemS, which aims to enhance collaboration between chemical experts) and the Global Harmonization Initiative (GHI, an organization which also aims to enhance global scientific collaboration and of which two members were interviewed). Regarding the NRAs, two representatives of the following agencies were interviewed: the Belgian Federal Agency for the Safety of the Food Chain (FASFC) and the Norwegian Food Safety Authority (NFSA). Finally, a representative of EFSA was interviewed to retrieve the experiences EFSA itself has had with the expectations of its audiences. All in all, this resulted in a total of fourteen interviews. See the appendix for a table that includes more specifications regarding the interviewees.

Interviews: Questions

In the interviews, the four reputational dimensions were not mentioned directly as these were unfamiliar to the interviewees. Rather, it was deemed more effective to ask evaluative questions to the interviewees. From the answers to these questions, it could be deduced which reputational dimensions the audiences focussed on when they assessed the reputation of EFSA. To achieve this, the interview guide included the following questions (next to follow-up questions that asked for clarifications and examples):

1. Do you have a positive or negative view of the reputation of EFSA? Why?
2. What things do you expect and demand from EFSA? Why?
3. What aspects of EFSA's duties and organizational behavior do you find the most/the least important? Why?
4. Do you think you find different aspects more important than other audiences of EFSA do? What are these and why?
5. What are some things that you think EFSA is performing well at? What do you think EFSA is not performing well at?

Moreover, it was realized throughout the interview process that some questions were more effective than others. For example, the third question was sometimes met with confusion by the interviewees. In contrast, the first question was often easily understood and interviewees answered this question elaborately. Therefore, later on in the interview process, the first question was asked more often than the third question to better gauge the reputational criteria valued by the interviewees. Despite this change in the formulation of questions, the answers to the initial more ambiguous questions still provided valid results due to the provision of clarifications by the interviewer (after which the interviewees gave comprehensive answers).

Interviews: Data Collection, Transcription, and Analysis

The data collected with the interviews were stored by recording them and thereafter transcribing them. Data transcription is not a technical formality and it should be treated with care (Atkinson & Heritage, 1984). Therefore, the principles of data transcription formulated by Mergenthaler and Stinson (1992: p. 125) were followed. One of these principles states that the data must be translated into a verbatim record as close as possible (Mergenthaler & Stinson, 1992: p. 125) and this was, therefore, one of the aims of the transcription. Moreover, certain emphases on words were included in the transcription by including intonations and placing adequate punctuation. Most of the interviews with the audiences were done in English, except for one interview with a Dutch academic who represented the Global Harmonization Initiative (GHI). This interview was translated into English to the best of the researcher's capabilities.

The interview data were systematically analyzed with the use of thematic coding. This method is commonly used to identify dominant patterns in qualitative data and to provide for systematic analysis (Ritchie et al., 2014: p. 282). To achieve thematic coding, first the data was familiarized with to understand the different themes highlighted by the members (Ritchie et al., 2014: p. 282). After this familiarization, the thematic framework was constructed based on the four reputational dimensions and on the different ways the audiences evaluated the reputation of the agency. Dominant patterns in the way the audiences evaluated the reputation of the agency were traced to find out what reputational dimensions they emphasized. This was done by categorizing the interviewees' answers according to their respective reputational dimensions (with the use of Word and color-coding). Thereafter, it was examined which reputational dimensions the particular audience mentioned most often and explicitly. Moreover, patterns were aimed to be found in the way in which the interviewees *compared* different reputational dimensions according to their perceived importance. Examples of such statements inferred, for example, that the interviewee deemed the technical dimension more important than the legal-procedural dimension. Finally, the relevant statements were included in their corresponding empirical section.

Method two: Qualitative content analysis

To ensure data triangulation, qualitative content analysis was also employed as a secondary method. Qualitative content analysis allows for rich descriptions of these specific narratives through the provision of quotations (Halperin & Heath, 2017: p. 353). Therefore, this method was used to provide a more nuanced understanding of how the relevant audiences evaluated the reputation of the agency. For example, this method allowed me to better show what specific elements *within* the reputational dimensions were emphasized by the audiences (such as the aspects of flexibility and integrity of the moral dimension).

The method was used in the following way. First, relevant texts of the audiences were aimed to be found by searching "EFSA" and the "European Food Safety Authority" in the search toolbox provided on the websites of the organizations. This allowed me to identify text fragments that were specifically directed to EFSA, which mostly included policy briefs and news items produced by these audiences. Only the documents that proposed particular policies to EFSA or provided an opinion on EFSA were selected, not the documents that only mentioned EFSA briefly as a scientific source. This was because, for the latter documents, one could not deduce the valued reputational

dimension. After, together with the interview data, relevant quotations were categorized according to their reputational dimension and included in their respective empirical section.

Finally, it must be admitted that quantitative coding analysis also would have been a valid method to explore my expectations. This was attempted at first, but regrettably, many of the policy documents were often too long which would have made quantitative coding too subjective (Halperin & Heath, 2017: p. 354). Additionally, some actors did not provide enough policy briefs or press releases (such as the business actors and the academics) to successfully perform the method for all the relevant audiences. Hence, qualitative content analysis was used as an alternative, also by mainly focussing on text fragments in which two reputational dimensions were compared with each other. This ensured that the communications were analyzed which not only highlighted the perceived importance of one dimension, but rather the importance of one dimension *over* another. This strengthened the relevance of a qualitative analysis of such policy briefs for my research. Moreover, the qualitative analysis of these communications also provided great insights into the contradictory demands (Carpenter, 2010: p. 59) held by different actors.

Operationalization of the reputational dimensions

To ensure that the quotations in both the interview transcripts and the policy documents were adequately categorized and coded according to the correct reputational dimension, the method initially created by Busuioc & Rimkutė (2018) and further developed by Rimkutė and de Vos (2020: p. 25-36) was used. The operationalization method used by Rimkutė and de Vos (2020) was the first and (so far) only tool that allows for systematic coding of reputational dimensions in text fragments (also given the provision of examples), and therefore this approach was also applied in this work. Even though this method was created to analyze the type of reputational dimensions stressed by EU regulatory agencies, it could be applied to the audiences' side too (as also proven by other authors like Overman et al. (2020: p. 419)).

This operationalization method worked as follows. For each dimension, the authors have outlined several aspects of the behavior, capacities, and outputs of regulatory agencies that correspond with particular reputational dimensions. In this work, if an *audience* emphasized one of these aspects in its evaluation of the reputation of the regulatory agency, the text fragment was determined to belong to the corresponding reputational dimension as presented in the table. The different facets of organizational conduct by regulatory agencies were matched with their respective reputational dimensions in the following way, a categorization method which has been taken directly from the article by Rimkutė and de Vos (2020: p. 25-36).

Table 1. Regulatory activities categories encompassed by the different reputational dimensions (Rimkutė & de Vos, 2020: p. 35-36).

Reputational dimension	Audience's focus during its assessment of the reputation of the regulatory agency
Technical	<ul style="list-style-type: none"> - The scientific and technical conduct of the agency, which include <ul style="list-style-type: none"> o Scientific outputs o Followed methodologies o Scientific rigorousness in all stages of professional outputs (evidence selection, analysis and reporting)

	<ul style="list-style-type: none"> - The expertise and skills of the agency's staff (including the degree of professionalism in their way of working) (addition by Overman et al., 2020: p. 419) - Cooperation with experts in the field (addition by Overman et al., 2020: p. 419)
Performative	<ul style="list-style-type: none"> - The agency's ability to attain goals set in their mandates and/or by other audiences in an efficient and effective way - The agency's ability to exercise regulatory power vis-à-vis particular audiences (such as industry or other relevant audiences)
Legal-procedural	<ul style="list-style-type: none"> - The agency's ability to follow due process, i.e. the legal proceedings that have to be followed in accordance with the rules and principles defined in the mandate (such as stakeholder consultations) - The agency's ability to report on day-to-day activities which the agency is pre-occupied with to fulfill its core responsibilities
Moral	<ul style="list-style-type: none"> - The agency's capacity to commit to safeguarding dominant social values - The agency's ethical behavior when it conducts its core tasks (inclusiveness transparency, fairness, accessibility, openness, and confidentiality)

To make the coding more precise, a list of keywords created by Busuioc & Rimkutė (2020) was also used. This list includes keywords that correspond with particular reputational dimensions. These keywords made it easier during the color coding to quickly identify the reputational dimension a text fragment was referring to. It must be emphasized, however, that this list of keywords was not a separate and second way to operationalize the reputational dimensions. Rather, it was merely used as an extension of the aforementioned operationalization to make the emphasized reputational dimensions more identifiable. As also mentioned, these keywords were not counted in a quantitative coding manner. The list of keywords for each reputational dimension, which has been directly taken from the online appendix of the article by Busuioc & Rimkutė (2020: p. 3), is as follows:

Table 2. Keywords that indicate one of the four reputational dimensions of bureaucratic reputation (Busuioc & Rimkutė, 2020: p. 3).

Keyword categories	Keywords
Performative reputation	Deliver*, enforce*, result*, achieved, achievement*, action*, adopt*_decision*, application*, assertive*, complianc*, comply, effecti*, efficien*, goal*, improv*, inspect*, KPI* [Key Performance Indicator], objectives, oblige*, outcome*, output*, performance*, restrict*, success*, timely*, target*.

Technical reputation	reliab*, test*, analy*, assess*, calcul*, data, evidence*, examin*, expert*, investigat*, knowledge, likelihood*, methodology*, model*, profession*, qualitat*, quantify*, quantitat*, research, rogo*r*, robust*, science*, scientif*, studi*, study*, technic*.
Procedural reputation	Consult*, formal*, independen*, protocol*, process*, rule*, access_to_document*, access_to_information, appeal*, conflict*_of_interest*, control_standard*, control_system*, declaration*_of_interest*, internal_control*, internal_operation*, internal_system*, judicial*, legal*, liability, management_standard*, management_system*, procedur*, provisions, requirement*.
Moral reputation	Protect*, values, committed_to, common_interest*, consumer*, credibility, dialogue*, engagement*, ethic*, flexibl*, good_governance, honest*, inclusiv*, integrity*, moral, openness*, precaution*, public_interest*, respect_for, safeguard*, societal*, transpar*, trust*, users.

Coding practice process

To ensure that this method was applied correctly in this work and to ensure inter-coder reliability, the latter which “reveals objectivity by showing the extent to which different coders, each coding the same content, come to the same coding decisions” (Halperin & Heath, 2017: p. 354), an intense practice procedure was conducted before doing the analysis. This almost two-month process unfolded as follows.

First, Dr. Rimkutè explained the four reputational dimensions in an in-depth manner so that the researcher and his co-student (who was also part of this project) understood the dimensions. Afterwards, in order to test the researcher’s understanding of how the reputational dimensions are captured empirically, three practice rounds of coding were conducted. In the first round, the researcher and his co-student were tasked with coding twenty news items produced by a large variety of EU agencies according to their respective reputational dimensions (these news items were provided by Dr. Rimkutè and analyzed with Microsoft Excel). Each news item could have (at maximum) two reputational dimensions: one being the most dominant, the other being the second most dominant. The inter-coder reliability after this first round was high. In the second round, however, the task was to code one hundred news items produced by EU agencies according to their expressed reputational dimensions. This exercise was significantly more difficult which was shown by the great number of disagreements among the three coders and the initially low inter-coder reliability.

To solve this, a third and final round was conducted to solve disagreements and ambiguities among the coders. This was done by having each coder compare the initial codes they used with the

codes of the other two coders. From this, the coder had to decide whether he or she still agreed with the initial code, or whether one wanted to switch to the code used by the other coder. Importantly, the coder had to justify these decisions. When meeting for a final time, each coder had to present their justifications regarding the codes of the news items on which there were disagreements. After the arguments were made, it often became clear to the different coders which reputational dimension was the most logical and the most in line with the empirical properties outlined by Rimkutė and de Vos (2020). Hence, these debates strengthened both the inter-coder reliability and also the researcher's understanding of the reputational dimensions. After this process, the similarity percentage of the codes was sufficient to proceed with individual coding.

Empirical Analysis

The NGOs

Introduction

Like the other chapters in the empirical analysis section, the structure of this chapter consists of three parts: an outline of the reputational dimensions emphasized by the actors, followed by a conflicting demand this emphasis resulted in and ending with the explanations of these actors' perceptions. Therefore, this chapter first highlights the reputational dimensions emphasized by the actors representing the NGOs. In line with the first main expectation regarding the NGOs, the moral reputational dimension was greatly emphasized. This emphasis manifested itself in three ways: a focus on the way EFSA protects the public interest (such as consumers and animals), the degree to which EFSA facilitates trust, and the transparency policy of EFSA. Second, this chapter shows that the NGOs also greatly valued the legal-procedural dimension such as EFSA's conflicts of interest policy, a finding which was not initially expected. Third, it shows that there was a contradictory demand: some NGOs believed that EFSA had to deviate from its mandate to better protect the public interest, which clashed with EFSA's performative dimension. Finally, reasons why the NGOs valued the moral and legal dimension were their role as value guardians, their organizational structure, and their amount of resources.

Reputational dimensions

The moral dimension: The public interest, trust, and transparency

The first moral criterion the NGOs used in their reputation assessment of EFSA was the degree to which EFSA aimed to defend the public interest. In the following statement by a representative of BEUC, a frame is present in which EFSA's capacity to protect the public interest is an important criterion on which EFSA's reputation was judged: "Because the very reason that EFSA was established back in the early 2000s was that the political interests of member states were too influential during the food crisis. That's why we have EFSA now. It's to ensure that this agency works in the *public interest: this is what we expect from them.*" This focus on the public interest by the NGOs was also confirmed by the representative of EFSA: "NGOs often focus on how we protect the *public good and public health concerns.*" Thus, both statements show that the way EFSA aims to

safeguard the public interest was an important point of departure on which the reputation of EFSA was assessed by the NGOs.

Consequently, this entailed that the NGOs did not only judge the validity of the scientific advice produced by EFSA on the basis of technical criteria, but also moral criteria. Namely, the NGOs perceived the technical ability of EFSA in relation to the societal consequences the advice would have on the safety and health of people and animals. The following statement by Beelife, an organization that aims to protect the safety of bees, shows the dynamic of the moral dimension influencing how the scientific rigorousness of EFSA was viewed by the NGOs: “EFSA has been using data from honey bee colonies that are located in agricultural environments where pesticides are used, to define the possible variability in the size of a honey bee colony. This is not scientific: *if we want to protect bees*, we need to define what the normal variability of a colony is based on colonies placed in pristine environments” (Beelife, 2021). In addition, the Pesticide Action Network Europe (PANEurope) stated that: “To our disappointment, EFSA’s pilot studies presented yesterday seem unfit for purpose to ensure that pesticides mixtures *cause no impact to human health and particularly to the most vulnerable groups in our population*” (PAN-Europe, 2020). These statements illustrate that the NGOs related the scientific advice by EFSA to matters of the public interest.

Related to the NGOs’ focus on how EFSA aimed to preserve the public interest when assessing the reputation of the agency, the NGOs also focussed on the way EFSA facilitated *trust* among citizens. More specifically, the NGOs focussed on the way EFSA tried to ensure trust in both the regulatory agency as an institution as well as in the outputs created by the agency. The following statement by the representative of BEUC highlights both of these elements: “Food is a very emotional area. So you see a lot of information also on social media which is not trustworthy. So it is important that we can at least *trust* EFSA or any other national agency and that the information coming from these agencies is *really trustworthy*.” Additionally, it was noted by the representative of Euro Coop that EFSA does not only have a role in facilitating trust among citizens in EFSA but also in the European Union “in general” given the current mistrust people have in the European Union (as perceived by the NGOs).

A final moral criterion the NGOs used was the transparency and openness of EFSA. The agency’s insurance of transparency was seen as a crucial task by the NGOs, also because this was believed to facilitate trust among citizens. First, BEUC expressed this focus in one of its policy briefs: “Transparency and openness are essential to ensure consumers’ *trust* in regulatory authorities (BEUC, 2014: p. 2). In addition, the focus on EFSA’s transparency policy by the NGOs was confirmed by the representative of EFSA, who explained that the NGOs were the main actors that advocated for the new Transparency Regulation that has recently been put in place by EFSA. Namely, this new regulation was said to be “an initiative by the NGOs, namely Greenpeace and PANEurope, asking first of all for more transparency and openness of the process.” Aside from the focus on transparency by the NGOs, it was notable that other elements which comprise the moral dimension, such as the level of honesty and inclusiveness of the regulatory agency, were not mentioned by the NGOs during the interviews. Rather, the NGOs perceived the level of transparency to be the key aspect of this reputational dimension.

The legal-procedural dimension: Cols and stakeholder processes

A second dimension that was emphasized by the NGOs was the legal-procedural dimension. For the NGOs, the reputation of EFSA greatly depended on whether EFSA aimed to ensure that its experts

were independent and did not have any conflicts of interest. Namely, a representative of the Federation of Veterinarians of Europe (the FVE) believed that “it is of paramount importance that there is *independence* of the risk assessment from risk management. This can be achieved by selecting experts who do not show any *conflict of interest* in the requested field.” In addition, the representative of BEUC also greatly valued the legal-procedural dimension by stating that: “So for us, the quality of this scientific advice is, of course, important, but also that it is *independent* from either commercial or political interests.” The importance of the independence of experts was also connected to aspects of the moral dimension. Namely, it was believed by the representative of BEUC that the independence of the experts could increase the level of trust people and consumers have in EFSA’s work. All in all, these statements show that the NGOs placed a great emphasis on the independence of the experts at EFSA, also because this independence was believed to help facilitate trust.

Finally, something that was valued by NGOs was the opportunity to engage in and be informed through stakeholder processes held by EFSA. Specifically, it was deemed important that through these processes the NGOs were adequately informed about the outputs and activities of EFSA. Some NGOs saw this as even more important than other aspects of EFSA’s regulatory behavior as exemplified by the following statement by a representative of Euro Coop: “Well, *opportunities to participate* are more important to us than other elements. Not necessarily to contribute to the discussion, *but to get updates, to get the full picture of what is going on at EFSA* and about everything that has a more consumer angle.” In addition, the representative of the FVE noted that it was important for EFSA “to capture societal needs and stakeholders expectations” early in the regulatory process. In both statements, a frame is present that shows that NGOs based their reputation assessments of EFSA on the regulatory’s body usage of stakeholder consultations and its capacity to inform audiences about EFSA’s day-to-day activities, both key elements of the legal-procedural reputational dimension.

Contradictory demands

There was one notable conflicting demand. Namely, some NGOs expressed that EFSA should at times deviate from its mandate so that the agency can better protect the public interest, a view which clashes with EFSA’s performative dimension. This view was expressed by the NGO BEUC in the following two statements in its policy briefs (BEUC, 2020 p. 1):

In our view, EFSA should be allowed to take a broad look at the issues which could impact public health and consumers, rather than just narrowly responding to a mandate.

The Agency should be allowed to modify the questions from the European Commission and to extend its scope if it considers it relevant from a scientific point of view.

In these statements, the consumer organization BEUC greatly emphasized the moral dimension by demanding more discretionary powers from EFSA so that the agency would be better equipped to protect the public interest. More specifically, the representative of BEUC believed that at times EFSA should also concern itself with risk *management* tasks (which also includes policy implementation

tasks), rather than only risk assessment tasks. Namely, it was believed that because such tasks also fall under the mandate of national regulatory agencies, EFSA should also have such responsibilities. The representative of BEUC stated: “To some extent, they [national agencies] sometimes step into risk management, which EFSA does not do: they always stick to risk assessment. So, sometimes it feels like the conclusion could have been expanded, which *is a matter of risk management rather than risk assessment.*” From this, a clear tension is visible with the performative dimension of EFSA, which concerns the way the agency fulfills its mandate created by its political principals. Namely, if the focus is on the performative reputational dimension, this would by definition not allow leeway for EFSA to deviate from its mandate. More specifically, given that the European Parliament and the European Commission are the risk managers and EFSA the risk assessor, this idea clashes with the expectations of these NGOs.

Interestingly, however, not all the NGOs placed prioritized the moral dimension over the performative dimension. For example, the following statement by ClientEarth clearly goes against the view advocated by BEUC: “EU law sets strict limits to the power of EU Agencies. They cannot be delegated discretionary powers and *their decisions have to rigorously abide by the limits of their mandate*” (ClientEarth, 2018: p. 1). This shows that there also exist intricate nuances *among* groups of the same audience and that emphases on reputational dimensions are also not always consistent within the same type of audience. Regardless, the focus on the moral dimension and the resulting demands posed by (for example) the organization BEUC showed that there exist tensions between the expectations of some NGOs and the political principals of EFSA.

Explanations

Why did the NGOs place great emphasis on the moral and the legal-procedural dimension? Several reasons could potentially explain the focus. First, there is evidence that the professional task of the NGOs as a value guardian for society played a role. Namely, during the interviews, the NGOs related their expectations and demands to those of their constituencies. For example, it was stated by the representative of BEUC that “Well, what we [NGOs] expect from EFSA, *what consumers expect of EFSA.*” In addition, it was stated that by the same representative that “it is really important that *citizens and consumers* can trust that the decisions are being made based on independent evidence.” Both these statements show that the reputational assessment by the NGOs was influenced by the demands of the constituencies represented by these organizations, namely European citizens and consumers. The representative of EFSA also highlighted this causal mechanism, as he stated that the reputation assessment of NGOs often depended on the “values” of their constituencies. In addition, the same causal mechanism can be used to explain the focus of the NGOs on the legal-procedural dimension. For example, it was deemed important by the representative of the FVE that EFSA should conduct proper stakeholder engagement procedures so that the NGOs can advocate the causes of the “societal interests” (those of the constituencies).

There were also other explanations that were not originally expected. First, the NGOs believed transparency was important as they were umbrella organizations representing national organizations (such as national consumer groups). Because of this, the NGOs valued transparency as they had to transmit information from EFSA to their national members. Namely, it was stated by a representative of Euro Coop that transparency was valued “because as an *umbrella organization* we have some issues at times to communicate our important topics and issues to our members that are focussed on the national levels.” Thus, because the NGOs had to communicate issues happening at

the European level to national members, they valued transparency and the provision of information by EFSA to aid this process.

A final unexpected reason that explains why these actors valued both dimensions resided in the *resources* of these actors, both in terms of their technical expertise and staff. Namely, the NGOs demanded that EFSA informed its audiences about its findings in an easy-to-understand and transparent manner because some NGOs had little technical expertise in the more complex regulatory issues covered by EFSA. For example, the representative of Euro Coop expressed this perceived importance in the following statement: “And for Euro Coop and me especially, because we *don’t have a lot of technical expertise*, I find it important that the discussion is easy to follow. Because yeah I guess, the info needs to be accessible. Even though *I don’t necessarily always have that scientific expertise* to dive into specific issues, they have a website and a newsletter which I use a lot to read and kind of select the kind of news that I can share with my members.” Also, the small size of (some of) the NGOs seemed to play a role in their emphasis on transparency as the following was stated by Euro Coop’s representative: “This is because *our size* is an issue now more than ever. If I have to cover sustainability and food and communication, it’s kind of vital that things are *easily identifiable*.” Hence, the amount of resources of the NGOs is another potential reason why this audience focussed on the moral and the legal-procedural dimensions in their assessment of EFSA’s reputation.

The businesses and industry associations

Introduction

First, this chapter shows that the performative dimension was greatly valued by the business actors and industry associations (hereinafter: the business actors), a finding which was in line with the expectation. This emphasis manifested itself in the following three ways: a focus on the quality and effectiveness of EFSA’s risk assessments (in terms of their costs, benefits and practical relevance for the industry), the emphasis on the efficiency of EFSA’s work processes (in terms of the time it took EFSA to complete the assessments), and the perceived importance of the number of resources of EFSA. All of these criteria fall under the performative dimension. Second, these actors focussed on the moral dimension by attaching great value to EFSA’s confidentiality policy, something which was not in line with the original expectation. Third, the emphasis on the particular reputational dimensions by these actors led to several conflicting demands as, for example, the industry’s need for confidentiality clashed with the NGOs’ desire for transparency. Finally, causal mechanisms are provided that to aim show why the business actors emphasized the performative and the moral dimension. These explanations are mainly related to the businesses’ interests and the competitive and financial costs and benefits EFSA’s work poses for these interests.

Reputational dimensions

The performative dimension: Effectiveness, efficiency, and resources

To start, the business actors focussed on the quality and the effectiveness of EFSA’s output when assessing the agency’s reputation. This frame was evident first by the emphasis on the totality of the

costs and benefits which EFSA's risk assessments posed for the industry. Namely, the business actors focussed on the potentially high costs of EFSA's assessments for the efficient functioning of their businesses. For example, it was stated by the industry representative of Prospero that: "If additional data is required, what is the marginal cost and what is the marginal *benefit* of providing that actual data?" In addition, this representative stated that "it is very easy to constantly request more data, more controls, whatever, but you actually have to look at the *marginal costs of them*." Moreover, the same representative argued that "if you are preventing one case out of one million, but the *costs are astronomical*, is that actually a good, you know, economically efficient outcome?" Second, the business actors focussed on the effectiveness of EFSA's output by demanding the agency's outputs to have practical implications for the industry. It was stated by the representative of Prospero that: "[One has] to make sure that the data and evaluations that EFSA is doing are not just *theoretical*, but also [that it] takes into account of how things work in *the real world*." A similar sentiment was expressed in the following statement by the industry representative of AnimalHealthEurope: "Well, as an association, we look at the *quality* of the output and the *relevance* of that output." All in all, these statements highlight that business actors focussed on the quality and effectiveness of EFSA's outputs (performative criteria) when assessing EFSA's reputation by emphasizing both the costs and benefits of EFSA's outputs as well as the practical relevance of these outputs.

The focus on the effectiveness of EFSA's outcomes in terms of the cost and benefits was made more explicit by a story told by one of the business actors. This example provides a more nuanced and detailed picture of the performative lens used by the business actors. Namely, the representative of Prospero mentioned a study performed in the USA which examined how hospitals should evaluate the risk of patients having a heart attack or not when they enter the emergency room. The study aimed to standardize and simplify this process, not only by ensuring that the risks were managed better but also by not "wasting very precious *resources* on people who are actually going to be fine." To do so, the study aimed to find only the most "*relevant*" indicators to reduce the costs of the risk assessments. The business actor summed up the conclusion of the study as follows: "And they reduced the amount of data from the very wide range of different tests to about ten indicators, and they developed this protocol that, when you just look at these ten indicators, you get *better outcomes*, you *prevent more heart attacks*, and you get *patients treated faster* than when you do all the additional tests." In sum, this example highlighted a detailed focus by the business actors on the costs and benefits of EFSA's work (its effectiveness) during the reputation assessment.

The second performative criterion emphasized by the business actors was the efficiency of EFSA's work processes, specifically the amount of time EFSA used to make its assessments. The following statements by several representatives expressed this focus on the time it took for EFSA to finish its assessments:

From time to time, the process by EFSA can be very long. And that is where we might have some concerns. You know, during the framework review of the food contact materials, we made a comparison on the number of introductions of new elements in the US compared with the EU, and you can see that there are more dossiers treated in the US than in Europe (representative of PlasticsEurope).

It's slowing down. Sometimes it is remarkable: when they [EFSA] start a procedure, they send a letter to the Commission, and we get a copy, and it says "x y z, we have taken aboard this and that mandate, and we will provide you the opinion on the 17th of August 2018". And then it can very well happen that in May 2018 you get a letter: due to our workload, this has been postponed to 2019 (representative of Huvepharma).

If you look at how long it takes for a request to be completed and fulfilled in the end: that can take about four years, which is a very long time (representative of I&P Europe).

The third and final performative criterion used by the business actors was the number of resources of EFSA in terms of its resources and personnel. Namely, the resources of EFSA were by many business actors believed to be causing the long time frame, and this therefore decreased the reputation of EFSA in the eyes of the business actors. It was stated by the I&P representative that “they [EFSA] have too few resources and staff to achieve everything in a particular time” and by Prospero’s representative that the long time frame “might be due to their resources.” All in all, these statements also illustrate the focus of the business actors on the performative dimension of EFSA, specifically with respect to EFSA’s resources.

The moral dimension: Confidentiality

Next to the performative dimension, the business actors also focussed on the moral dimension. Unlike the NGOs, however, the focus was not on the transparency policy of EFSA, but rather on the confidentiality policy of the agency. Namely, it was valued by the business actors that EFSA paid attention to the protection of sensitive information of the industry as expressed in the following statement by the representative of PlasticsEurope: “The role of EFSA is to protect our industries. If EFSA is too transparent, the risk for the industry is that it loses its competitiveness. That is one of the *question marks we have with more transparency.*” This focus by the business actors on the confidentiality policy was also noted by the representative of EFSA: “We can’t put everything open to the public. There has to be the confidentiality agreement: *they [the business actors] want to protect their intellectual property, their patents, etcetera*”. All in all, these actors also emphasized the moral reputational dimension, specifically EFSA’s approach to confidentiality.

Contradictory demands

The focus on the performative dimension resulted in several contradictory demands. First, the independence of EFSA (the legal-procedural dimension) was believed to clash with the timeframe of EFSA’s risk assessments (the performative dimension). Namely, it was believed by the representative of Huvépharma that the slowness of EFSA’s procedures was due to their (perceived) independence from other interests. The representative stated that: “The fact that they [EFSA] are completely independent, actually no one in Europe can hold them responsible for anything, only the Parliament, the principal, means that you have no impact at all on them, and that means that they go their own way in all meanings. And that is something which is very annoying because it is slowing down regulatory procedures and slowing down the innovation of new products.” Thus, this representative believed the independence of EFSA clashed with the speediness of EFSA’s risk assessments, resulting in a contradictory demand held by the audiences.

Second, the focus on EFSA’s confidentiality policy by the business actors clashed with the focus on transparency by the NGOs. The view expressed by the business actors that EFSA should not be too transparent, for example by releasing findings of the food industry, clashed with the transparency desire of, for example, the organization BEUC. In the following policy briefs of BEUC, it was expressed that such dossiers *should* be made transparent to the public without people having to ask for permission: “We will have to remain vigilant, however, on how the new transparency rules

work in practice. Independent scientists should be able to access, use and quote safety data produced by the food industry *without having to seek permission*” (BEUC, 2019). In sum, the focus on EFSA’s confidentiality policy by the business actors was at odds with the focus on EFSA’s transparency policy by the NGOs.

A third and final tension existed between the focus on quick risk assessments (the performative dimension) and the scientific rigorousness of EFSA’s procedures (the technical dimension). As also highlighted by the representative of the Belgian Food Safety Authority, conducting scientifically rigorous risk assessments can be “very time-consuming” for regulatory agencies. Hence, if business actors want these assessments to be performed quickly, this demand could clash with another audience’s desire that the agencies also ensure the scientific rigorousness of their work.

Explanations

Why did the business actors greatly emphasize the performative and the moral dimension? First, it seemed that the competitive interests of these actors played a role as these were hurt by EFSA’s time delays. More specifically, the time it takes to complete the risk assessments can affect the competitive position of the business actors vis-à-vis other corporate actors in the market. Namely, it was highlighted by the representative of HuvePharma that “as an industry or as a pharma you want to have new products fast *because the rest of the world is getting them fast.*” This statement implied, that because other (international) business actors also aim to acquire a share of the market, EFSA has to perform quick risk assessments so that the business actors in the European Union do not lose the competition on the global market. In addition, the competitive costs also played a role in explaining the focus by the business actors on the moral dimension, specifically EFSA’s confidentiality policy. Namely, it was stated by the representative of PlasticsEurope that “if you start to be transparent about all the information of a dossier, and then it takes two years of a substance to be completely reviewed and authorized, *it means that a competitor from China or another place can start to use what you provided use as information, while you have to wait for two years to use it.*” Hence, the competitive interests of the business actors help to explain both their focus on the performative and the moral reputational dimension.

In addition and relatedly, the financial interests of the business actors helped explain the focus on the performative dimension as these were also hurt by EFSA’s time delays. Namely, it was stated by the representative of Prospero that the time delays bring “opportunity costs for the industry.” Such costs can be seen as the potential (financial) benefits a business misses out on if a particular course of action is chosen by the regulatory agency. Such costs, it was claimed, were deemed to be especially harmful to the audiences from the agricultural industries as these actors have to “take into account the seasons” and “a delay of a month can mean that you miss an entire season and you have to wait a year.” Hence, it seemed that the financial interests of the business actors was an important factor in explaining why this audience focussed on the efficiency of EFSA’s processes in their judgment of EFSA’s reputation.

Finally, the business actors valued the efficiency of EFSA’s process because shorter time frames allow for this audience to know if it is complying with the rules or not. Namely, it was suggested that if the time frame of EFSA’s assessment is long, it can make business actors unsure about whether their products can be sold on the market. The representative of the Imaging and Printing Association highlighted that: “There would be legislation for the ink soon, but that has been

delayed and brought to a later stadium. But because of that, you don't have any real result that shows whether you can use these particular materials, *and then you also don't know if you are in compliance [with the rules].*" All in all, the business actors valued the performative dimension when assessing EFSA's reputation as more efficient processes would reduce this feeling of uncertainty of the business actors when they conduct their professional operations.

Academics and national regulatory agencies (NRAs)

Introduction

This chapter first outlines which reputational dimensions were emphasized by the academics and the actors representing the NRAs. In line with the expectations, it was found that both of these audiences stressed the technical dimension. When these actors evaluated the reputation of EFSA, this frame was visible in the following ways: the focus on EFSA's scientific procedures and the level of expertise, the emphasis on the degree of professionalism of EFSA, and the focus on EFSA's level of cooperation with other scientific experts. These components all fall under the technical dimension. Second, and this was not in line with the expectation, these actors also valued the moral reputational dimension, specifically the degree of transparency of EFSA. Third, this chapter shows that the focus on the technical dimension resulted in a contradictory demand as this demand clashes with the desire for independent EFSA experts. Finally, several causal mechanisms are provided that aim to show why these actors valued these particular reputational dimensions with respect to EFSA, which are mainly related to the professional training, roles and values of these actors.

The technical dimension

Scientific expertise and procedures

To start, these actors used the level of scientific procedures and expertise of EFSA as a primary criterion to judge the agency's reputation. This focus on EFSA's technical ability was first highlighted by one representative of the Global Harmonization Initiative (GHI) as his primary focus on EFSA was their "*scientific* substantiation of decision-making in the food sector, but also in adjacent areas like crop protection products." Another representative of the GHI believed that "EFSA is *science*", that the expertise of EFSA's staff was "completely indispensable", and that without the science the organization "would be useless". Because of this focus on the technical dimension, the focus on the way EFSA protects the public interest (as held by the NGOs) was less visible in the frames of these actors. For example, a representative of the GHI responded to the view held by BEUC (which expressed that EFSA should at times go against its mandate to better protect the public interest) in the following way: "I am satisfied if EFSA limits its space to *scientific issues* and rather says things like 'toxicology and microbiology are good, but there are also other scientific viewpoints where we see particular questions and hesitations.'" Thus, these actors focussed more on EFSA's technical capacities rather than on the agency's moral duties when evaluating EFSA's reputation.

More specifically, the focus was on the scientific procedures EFSA used to conduct its risk assessments. Namely, it was stated by the representative of EFSA that the academics

“are more interested in the *methodologies* and the *processes* that EFSA is using” than the other audiences. Therefore, it was stated that “they [the academic actors] are sometimes critical towards the methodologies, saying that we are not necessarily using the latest *technological developments* and that the *methodological approach* is old-fashioned and outdated.” Such a focus on EFSA’s scientific methodologies was also present in one of the few policy documents created by the academic organizations which were directed towards EFSA. The following statements by the European Chemical Society (EUChemS) exemplify this frame as they show an emphasis on EFSA’s measurement of uncertainty, EFSA’s usage of particular scientific terminology, and the way EFSA analyzes research from other disciplines in the scientific literature (EUChems, 2018):

EuChemS responded to the consultation by highlighting several issues. Firstly, we believe a clearer distinction needs to be made regarding measurement uncertainty (associated with scientific processes) and uncertainty caused by other sources (such as through government actions (or lack of actions)). We also encouraged EFSA to align its terminology with existing international terminology.

Indeed, if we look at evaluations and expressions used for measurement uncertainty in physics, chemistry, and other fields, we can see there already exists certain sets of standards. EuChemS moreover provided EFSA with a number of references from scientific literature in this respect.

Like the academics, representatives of the NRAs had a similar focus on EFSA’s technical capacity and procedures when rating EFSA’s reputation. Namely, the representative of the Belgian Food Safety Authority (BFSA) believed that one of the most important aspects of EFSA’s organizational conduct was that “when an opinion has to be prepared, it always has to work *with all the data that are available*. If at a certain moment the data are not available because of a lack of knowledge, then there is a *need to do research, to do investigations*.” Second, this representative found it highly important that the data EFSA used were “reliable”. Therefore, the “weight of evidence” procedure used by EFSA was believed to be “crucial” and a “very important way of working”. This procedure is, according to EFSA (2017), “a process in which evidence is integrated to determine the relative support for possible answers to a question” and is used by EFSA to judge the reliability of its scientific articles. All in all, these statements reflect that the actors representing the NRAs also focussed on the scientific methods used by EFSA and hence used technical criteria to judge the reputation of EFSA.

Professionalism and scientific cooperation

Moreover, the degree of professionalism of EFSA was another important criterion used both by the academics and the NRA representatives when they judged the agency’s reputation. Professionalism can be seen as the degree to which EFSA conducts its work competently and skillfully. As was stated by the academic representative of EUChemS: “something that I value very much, in general, but also with EFSA, is that they are very *professional* in what they are doing.” The level of professionalism was related to, for example, the management of EFSA’s procedures in terms of how they organize its “strategic discussions” and how they handle their “communications”. The member of the Norwegian Food Safety Agency (NFSA) expressed a similar frame as she held EFSA in high regard because “they [EFSA] do their work in a very *professional* way.” This representative believed that the level of professionalism of EFSA was present in both EFSA’s administration and its expertise, including “how they are organized, how they appoint their committees, how they conduct their risk assessments,

and how they document everything.” This actor therefore concluded that “maintaining a high level of professionalism [...] is crucial” for EFSA. In sum, these statements show that both the academics and the NRAs focussed on EFSA’s level of professionalism and in turn on the technical reputational dimension.

A final technical element on which both the academics and the representatives of the NRAs focussed was the degree of cooperation EFSA had with other scientific experts. More specifically, it was deemed important by these audiences that EFSA cooperated with experts in the field of food safety to make better risk assessments. These experts, according to these audiences, had to include representatives of other national agencies, European agencies, and global scientific organizations (such as the GHI). First, the representative of the BFSA believed that if EFSA would engage in more “data-sharing” with national agencies, it would better his view of the reputation of EFSA. Second, the representative of the NFSA deemed it very important for EFSA to have “very good cooperation with those [EU] agencies [such as ECHA] and have a look at how you can overcome that strong divide between the disciplines.” Third, it was believed by the representative of the GHI that the input from scientific experts was more valuable for EFSA than the input from other types of audiences. In fact, the representative of the academic organization even believed that EFSA should only consider input from *scientific* audiences on regulatory issues. Business actors were believed to “not come up with scientific arguments” and were not believed to “contribute anything sensible”. Therefore, it was believed that EFSA had to “ignore that [type of input]”, but not the contribution from scientific audiences as EFSA “should only base their decisions and conclusions on science.” All in all, these statements reflect that these audiences greatly valued EFSA’s level of cooperation with other experts, and also that some of these actors even prioritized technical aspects over other elements of regulatory conduct (like the consultation of business actors).

The moral dimension: Transparency

Next to the technical dimension, the academics and the representatives of the NRAs also greatly considered the moral dimension. More specifically, these actors focussed on EFSA’s level of transparency when evaluating the agency’s reputation. Namely, it was believed by the member of the Norwegian Food Safety Authority that “maintaining a high level of [...] transparency is crucial.” This representative also believed that EFSA’s attempt to improve its transparency policy was positive for its reputation as this “increases the trust in the agency”, expressing a similar view held by the representatives of the NGOs. In addition, the representative of the GHI also expressed this focus on transparency as he believed that “it would be great that it can be followed what they [EFSA] do”. All in all, these statements reflect that these audiences attached great importance to EFSA’s transparency policy and hence to the moral reputational dimension.

Contradictory demand

These audiences’ focus on the technical dimension resulted in one contradictory demand. Namely, it was shown to be difficult for regulatory agencies to acquire both high-level experts (the technical dimension) and to ensure that these experts are also fully independent (the legal-procedural dimension). This was noted by the representative of the GHI, who stated that “it is quite a difficult thing for EFSA to find people who are “clean” [have no conflicts of interests], amongst other reasons because the academic world is increasingly interwoven with the commercial world.” Therefore, the

level of independence of a regulatory expert can potentially clash with his or her level of expertise, as also noted by the same academic representative: “If if you take someone completely “clean” [independent], then in more than ninety percent of the cases that would be a completely inexperienced person.” All in all, these statements showed that regulatory agencies can face conflicting demands by having to balance the technical dimension (the level of expertise of the experts) and the legal-procedural dimension (the level of independence of the experts).

Explanations

To start, why did these audiences focus on EFSA’s scientific procedures and level of expertise when judging the reputation of the regulatory agency? One explanation provided by these audiences was that they examined EFSA in an *objective* manner and hence focussed on these scientific elements. Two reasons were given for this objective frame. First, it was believed that the professional knowledge in the field of food safety of these actors made them scrutinize EFSA objectively. Namely, it was stated by the representative of the NFSA “you get a little bit more objective when you have *more knowledge about these things*. That is because you can understand that you can look at the same thing in different ways depending on what your terms of references are.” Hence, it was believed that the technical knowledge of these actors on these issues allowed them to understand the differences between methodologies employed by EFSA and not experience one as “the goodie” and the other as “the baddie”. In other words, it was perceived that the level of knowledge of these actors made them examine EFSA’s outputs objectively and less in relation to, for example, particular moral values.

Second, the objective frame was believed to exist among these audiences as these actors were not greatly personally affected by EFSA’s output. It was stated by the representative of the GHI that “my position is primarily academic. So if EFSA makes mistakes, or makes tough choices, *then I am not the one who gets the bruising*. And if you are a direct party in the procedure, or if you have strong feelings about particular supplements, or whatever, then you are different in the game than when you are a bit at a distance.” This was also affirmed by a representative of the NFSA, who expressed that she had no “agenda” concerning EFSA like some of the other audiences. Therefore, it seems plausible that these actors generally focussed more on technical aspects of EFSA’s organizational conduct rather than on the level of efficiency and the cost and benefits of EFSA’s outputs as these actors were not greatly affected by the quality of such matters (contrary to, for example, the business actors and their respective interests).

Second, however, the focus on scientific cooperation *did* seem to stem from one particular shared professional interest of both the academics and the NRAs (and EFSA). Namely, an important part of the professional tasks of these actors was to improve the quality of risk assessments on a global scale. In their roles, these actors encountered problems with the risk assessments as they had become more “complex” and therefore required people “across [different scientific] disciplines” to work with each other (according to NFSA’s representative), also to avoid “duplication [of the work]” (according to one GHI representative). Thus, as these members experienced similar problems of “silos” in their professional roles and daily operations and wanted to improve upon these issues to achieve their professional interests, they focussed on the level of scientific cooperation of EFSA and hence the technical dimension.

Finally, it seemed that the scientific training of these actors played a role in their focus on the moral dimension. Namely, it was claimed by the representative of the NFSA that “most of the

scientists are trained in a way that we look at the sources of information and critically review the sources of information.” Therefore, this representative “wouldn’t take a statement at face value without knowing anything about the background for it.” This seemed to show that because the actors were trained to value transparency in their professional work (when assessing the validity of the academic works of colleagues), they also valued this with respect to EFSA.

Discussion

Given the little research performed on the values of the audiences of regulatory agencies and the practical significance of such research for public managers, this work aimed to explore this matter in the context of the EU. Specifically, it aimed to find out whether the type of audience affects the type of reputational dimension that is emphasized by the audience and if so, how and why. With the use of the reputational dimension framework of Carpenter (2010: p. 46), semi-structured interviews with multiple audiences, and qualitative content analysis, this work attempted to answer the following research question: *“How does audience heterogeneity account for the types of reputational dimensions that are emphasized by different audiences of EU regulatory agencies when they assess the reputation of these organizations?”*

In response to the research question, the following answers can be given. First, this work has provided support for the claim that audience heterogeneity affects the types of reputational dimensions that are emphasized by different audiences of EU regulatory bodies. In turn, this work supports the ideas in the bureaucratic reputation literature (Carpenter, 2010: p. 34; Maor, 2014: p. 19) and the corporate reputation literature (Bahr et al., 2010: p. 9) which express that different audiences focus on different reputational dimensions in their assessment of the reputation of regulatory organizations. Hence, the results provide more support for the first expectation posed in this work than the second competing expectation. Namely, the findings did not show that audiences only focussed on the performative dimension because of a dominant societal emphasis on efficiency and effectiveness. In addition, the findings did not support the idea that the audiences only considered the nature of the mandate of the regulatory agency in their reputation assessment and therefore only focussed on the technical dimension. Rather, different audiences stressed different reputational dimensions. However, it was interesting to observe that multiple audiences paid great attention to the moral dimension of regulatory reputation, specifically the aspects of transparency and confidentiality. Finally, the results have shown that the different emphases on reputational dimensions can lead to contradictory demands for regulatory agencies (Carpenter, 2010: p. 59). This work has expanded upon the argument by Carpenter (2010) by showing that there exist tensions between, amongst others, the moral and the performative dimension, the technical and the legal-procedural dimension (which supports the ideas by Ossege (2014: p. 414)), and the technical and the performative dimension. This finding also supports the view held in the bureaucratic reputation literature which states that regulatory agencies have to juggle competing demands in their reputation management strategies (Carpenter, 2010: p. 59; Rimkutė, 2020b: p. 388).

In light of the expected causal mechanisms, this work has shown that different factors can help explain why different audiences value different dimensions. In general, these elements included: 1) the tasks and roles of the audiences (like protecting the needs of constituencies), 2) the resources and structures of the audiences’ organizations (like having few resources), 3) the interests of the audiences and how these are affected by the agency’s work (for example through imposed

costs), and 4) the professional training of the audiences (which resulted in particular professional values).

More specifically, some causal mechanisms for each audience were supported by the findings while others were not. First, it seemed that for the NGOs their role as “value guardians” (Salamon, 1993: p. 16) and their task to come up for the public interest (Weidenbaum, 2009: p. 147) played a role in their focus on the moral dimension. This is because these actors greatly considered the demands of citizens during their reputation assessment of EFSA. In addition, and this was not expected, the organizational structure of the NGOs and their number of resources played a role in their focus on the legal-procedural dimension. Second, for the business organizations, it seemed that their interests and the costs imposed by EFSA played a role in their focus on the performative dimension and the moral dimension as the costs hurt their interests to make profits. This also illustrated how the regulatory burden (OECD, 2009: p. 1; Lodge & Wegrich, 2012: p. 12) played an important role in the reputation assessments by the business actors as this affected their financial and competitive interests. Moreover, however, the findings showed little support for the expected idea that because business organizations value efficiency in their organizations (as exemplified by the usage of KPIs), that they also demand this from regulatory organizations. Third and finally, regarding the academics and the NRAs, it was the combination of their professional roles, training (which resulted in them having some of the values as expressed by Riviere & Buckley (2012)) and interests that seemed to play a role in their focus on the technical and moral dimensions.

Methodological implications

Aside from the theoretical contributions, conducting this research work also provided several methodological insights. After having performed the method of semi-interviews to answer the research question, several lessons can be drawn. First, while the method led to sufficient insights into the type of reputational dimensions that were valued by the audiences as well as into the causal mechanisms that helped explain these emphases, it was at times difficult to deduce what audiences valued the most merely from the interview data. This was because respondents at times mentioned multiple aspects of EFSA that were important to them throughout the same interview. Given this, it could potentially be more effective to first explain the reputational dimensions to the respondents, and then ask them how they would *compare* the dimensions with one another in terms of how they perceive their importance. Perhaps this would give a clearer picture of what reputational dimensions audiences value the most.

In addition, some questions worked better than others. For example, the question of “How do you perceive the reputation of EFSA and why?” was easier understood by the interviewees than “What do you find important about the organizational conduct of EFSA?”, even though these questions aimed to retrieve a similar type of answer (the reputational criteria used by the audiences). Therefore, it is recommended that the former question is mainly used in future works in this research area. More methodological work, however, needs to be done to develop similar effective questions to gauge what reputational criteria audiences emphasize.

Finally, this research process has shown that more work should be done on the conceptualization and operationalization of the reputational dimensions valued by different audiences. Even though Carpenter’s (2010) four dimensions are widely accepted in the bureaucratic reputation literature (Bustos, 2021: p. 5), sometimes it was difficult to decide when a particular text fragment adhered to, for example, the legal-procedural or the moral dimension. For example, the

focus of an audience on whether an agency aims to be inclusive or not was in this work conceptualized as part of the moral dimension (inspired by works of, for example, Rimkutė and de Vos, 2020), but it also has a potentially legal-procedural aspect to it given that stakeholder consultations (which fall under the legal-procedural dimension) can also make agencies more inclusive. The problem of clear demarcation of the reputational dimensions also seems to be evident in previous works on organizational reputation, for example in Overman et al. (2020). In this work, the degree of objectiveness of the agency is perceived to be part of the legal-procedural dimension, but to me, this is also a cornerstone of the scientific procedure (the technical dimension). In addition, the same work considers the agency's independence from political considerations to be part of the moral reputational dimension (Overman et al., 2020: p. 413), while the agency's independence from the industry is perceived to be part of the legal procedural dimension (idem): Why do these authors make this distinction? All in all, to decrease ambiguity in future research in this field, more work should be done on the conceptualization and operationalization of the different reputational dimensions.

Practical implications

This research also has policy-relevant implications. First, this research has shown that regulatory agencies need to tailor their communications according to the specific values of different audiences. More specifically, this work has provided modest evidence that regulatory agencies should focus on sending moral and legal-procedural communications to NGOs, performative communications to businesses and the industry associations, and technical communications to academics and members of NRAs. While it is of course not as black-and-white, this could be a starting point that regulatory managers can use in their reputation management strategies.

Additionally, this work has shown that even though EFSA's mandate mainly concerns scientific work, audiences greatly valued other dimensions such as the moral and legal-procedural dimensions. Hence, this work supports the view that "the performance management turn in the public sector may need to be supplemented by enhanced organizational attention to procedural and moral aspects" (Overman et al., 2020: p. 416) to "secure a positive organizational image" (idem) for public regulators. To do this even more effectively, it is recommended that EU regulatory agencies think carefully about the specific types of narratives and forms of communication that are most fitting to these different emphases on reputational dimensions. A question that public regulators need to answer is: What specific types of communicative messages are most effective in responding to audiences that, for example, demand more transparency and inclusiveness from the regulatory agency?

Third, this work has implications for the relatively novel development and usage of reputation barometers in a public sector setting (Lee & van Ryzin, 2019: p. 183; Overman et al., 2020: p. 419). Such barometers aim to gauge the multi-dimensional reputation of regulatory agencies by posing several evaluative questions to respondents about specific reputational dimensions. However, what this work implies, and what is in line with the ideas of Shenkar & Yuchtman-Yaar (1997) and Dowling (2006), is that because different reputational attributes do not have equal relevance for different audiences, this can affect how respondents react to such surveys. In other words, developers of these barometers should consider that because audiences emphasize different dimensions, they might be more knowledgeable and opinionated about particular reputational dimensions than others. This can, in turn, skew the results of such surveys, which

should be considered by public managers. Moreover, the findings provided by the reputation barometers should not only be interpreted as being the result of particular regulatory behavior by the *agencies* (like failing to reach particular goals or being unethical) but also as being the result of different emphases on reputational dimensions by the *audiences*.

Finally, regarding the conflicting demands of different audiences, a balance in regulatory behavior and regulatory communication needs to be achieved as much as possible. If the demands are by definition contradictory, however, careful considerations need to be made about which audiences can impact the reputation of these agencies the most given their level of authority and resources. Once considered, reputation management strategies should be tailored to the more influential audiences so that the communications become more effective from a reputation-management point of view.

Limitations

This study had several limitations. First and most importantly, the findings lacked generalizability. The study would have benefitted from a larger sample size to give the results more external validity. Achieving a large sample size, however, proved to be difficult due to the unresponsiveness of many potential respondents (possibly also due to COVID-19 and time constraints of potential interviewees). Consequently, this also meant that not all audiences were considered such as the European Parliament and the European Commission.

Other limitations of conducting qualitative research are interview effects. This entails that the personal characteristics of the researcher negatively affect the data gained from interviews. For this study, the characteristics of the researcher might have impacted the collected data. This could have been the case due to the differences between the researcher and the interviewees in terms of, for example, age and nationality, which could have resulted in less rapport (the degree of comfort between the interviewer and the interviewee). Furthermore, being a researching student could have had impacted the data as interviewees might have tried to present themselves in the best light possible and therefore they could have highlighted the reputational dimensions that are seen as more socially accepted and desirable (such as the moral dimension).

There were two other final limitations. Namely, the usage of online video interviews decreased the level of the nuance of the interview data as this method made people's tone, facial expressions, and non-verbal gestures more difficult to detect than when doing in-person interviews. Moreover, the interviewees did not all have the same type of professional function within their organizations. Some participants were directors or secretaries-general of their organization, but other participants performed other professional tasks such as stakeholder management or Public Relations (PR). Hence, the different roles of the representatives in their organizations could have impacted what reputational criteria they emphasized. However, given the difficulty in obtaining interviews, this limitation had to be accepted so that a sufficient amount of interviews could be conducted. Future research, however, should attempt to circumvent this limitation by interviewing members that have a similar type of role in their respective organizations.

Future research

There are several ways in which future research could be conducted. First, there are many other potentially interesting research questions that could be explored concerning the expectations and

demands of different audiences of regulatory agencies. For example, more research could be done on the potentially intricate difference *within* different groups of audiences: for example, are there particular types of business actors that value the moral and/or legal-procedural dimension more than other business actors? Would business actors that increasingly focus on corporate social responsibility (CSR) value the moral dimension more than others? In addition, it would be valuable to explore how effective regulatory agencies are at communicating different messages according to the reputational dimensions emphasized by different audiences. This could be done by comparing the main values expressed in the communications strategy of a regulatory agency (using the coding strategy of Rimkutė and de Vos (2020)) with the dominant values held by its audiences. Such research would give great insights into the effectiveness of reputation management strategies by EU agencies, something which has not been explored in-depth.

Second, other types of methods and data can be used to investigate the reputational dimensions valued by different audiences. This study made modest initial claims with qualitative data, and therefore the usage of large-scale quantitative data (for example by surveying different audiences) would be a logical next step. In such surveys, an option would be to have participants rank particular reputational dimensions according to their perceived importance. However, not only surveys would be suitable: different source material such as actors' outputs on social media (Twitter, Facebook, LinkedIn) that is directed towards regulatory agencies could be investigated. Finally, focus groups can be conducted in which different audiences participate as such sessions could provide different explanations of the reputational criteria valued by audiences than mere interviews. This is because focus groups give insights into how different audiences *jointly* give meaning to events in a social setting. This can be relevant as audiences can be influenced by other people when they make their reputation assessments of regulatory agencies.

Third, it is important to investigate possible changes in the expectations and demands of different audiences. Indeed, reputation is created *over time* (Grunig and Hung, 2002). This also means that audiences' expectations and desires towards regulatory agencies can change. For example, there might arise a change in societal norms. For example, there might be increased skepticism towards science, and therefore there could be less value attached to the technical reputational dimension in the future. Otherwise, there could arise particular changes *within* the audiences themselves that can alter how they assess the reputation of regulatory agencies. To explore such matters, research can be done by retrieving longitudinal data, for example by interviewing or surveying audiences at different points in time. The results of such works would also have great practical relevance. For regulatory agencies, it is very important to notice potential changes in the emphases on reputational criteria as they can affect the degree of success of their reputation management strategies. Namely, a change in the audiences' expectations regarding the agency or the sector in which it operates is a major source of a reputational threat (Maor, 2020: p. 1046). This can, in turn, negatively affect the reputation of the agency if the agency does not align its communication strategy to such a change.

Fourth, other audiences and regulatory agencies should be investigated. Regarding the former, possible new audiences to investigate are other institutional actors such as members of the European Commission, the European Council, and other EU regulatory agencies. Regarding the latter, it would be interesting to explore if the results of this work also transfer to the audiences scrutinizing, for example, the Fundamental Rights Agency (FRA), the European Chemicals Agency (ECHA), or regulatory agencies in other countries such as the USA (like the Food and Drug Administration).

Fifth, the causal mechanisms developed in this work need to be investigated further. This work hopes to have provided several causal mechanisms which could be tested with more rigorous explanatory case studies. It also needs to be investigated whether there the provided causal mechanisms are inherent only to particular audiences or not: Do the number of resources only matter for the NGOs? Do the costs imposed by regulatory agencies only matter for the business organizations? Or are the causal mechanisms applicable to multiple audiences? Finally, this work encourages future researchers to try and find new causal mechanisms that have not been outlined in this work.

Conclusion

To conclude, this work has shown that audience heterogeneity accounts for the way audiences assess the reputation of EU regulatory agencies. This, in turn, makes for a dynamic environment of competing expectations in which regulatory agencies have to operate. Several factors seem to play a role in the audiences' emphases on reputational dimensions, and it would be valuable if future research explores such causal mechanisms more in-depth. Moreover, this work hopes to have provided useful recommendations for reputation managers of regulatory agencies so that they can positively enhance their reputations and in turn better legitimize their organizations. Finally, there is substantial potential for new scientific endeavors to explore the *audiences'* side of reputation management in the public sector, the results of which can hopefully shed more light on the considerations made by audiences in their reputation assessments. In turn, the results of more research could potentially also make reputation management strategies more effective, something which is greatly desired by the regulatory agencies of today.

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Appendix

List of interviewees

Interviewee	Date	Duration of the interview
Representatives of Huvepharma and AnimalHealthEurope (business actors) (joint interview)	26/05/2021	00:17:18
Representative of the Global Harmonization Initiative (#1)	31/05/2021	00:31:58
Representative of Prospero	01/06/2021	00:28:13
Representative of BEUC	03/06/2021	00:21:25
Representative of Euro Coop	03/06/2021	00:25:35
Representative of PlasticsEurope	03/06/2021	00:38:26
Representative of the Federation of Veterinarians of Europe	03/06/2021	Written response
Representative of the Belgian Food Safety Agency	04/06/2021	00:27:18
Representative of I&P Europe	07/06/2021	00:16:29
Representative of EFSA	07/06/2021	00:28:46
Representative of the Norwegian Food Safety Agency	11/06/2021	00:17:17
Representative of the Global Harmonization Initiative (#2)	14/06/2021	00:13:41
Representative of EUChemS	21/06/2021	00:24:26