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**POLICY INTEGRATION AND INTERNATIONAL REPRESENTATION:
PROMOTING FOOD SAFETY INTERESTS ON THE WORLD STAGE**

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1. Introduction

The number of policy issues regulated by international trade agreements has increased after the establishment of the World Trade Organisation (WTO) in 1995. As states face more international treaty obligations that have direct consequences for domestic policy-making, the need for effective representation of national interests at the international level increases. However, what makes for effective international representation? This question can be approached from different perspectives. Negotiation theory highlights the strategic aspects of international negotiations, and the political science literature has for instance identified negotiator weakness as a potential bargaining strength (Schelling, 1960; Putnam, 1988). In this paper, we assume that organization matters, and we make a preliminary attempt at exploring the above question through a theoretical and empirical examination of organizational variations in international representation. A central assumption is that some organizational solutions can be regarded as more appropriate than others given the legitimate objectives pursued. Towards this aim, we compare the representation of Canadian and European Union (EU) food safety interests on the world stage.

The paper focuses specifically on Canada's and the EU's external representation to the WTO Committee on Sanitary and Phytosanitary Measures (SPS Committee). This committee was established to administer the WTO Agreement on the Application of Sanitary and Phytosanitary Measures (SPS Agreement), which commits WTO members to ensure that their measures to protect consumers' health and food safety do not distort trade more than what is strictly necessary. Given that the WTO embraces cross-national harmonization of food safety policies, and that the members have agreed to be bound by the rules and standards set by this institution (Skogstad, 2001a; b), effective representation to the SPS Committee, as well as to other intergovernmental bodies linked to this committee, becomes imperative for states seeking greater leverage over international food safety developments.

National delegations to international organizations operate in the complex intersection between domestic and international policy-making. Their work is often complicated by the existence of both ideological and structural differences between the two levels. In this paper, we assume that the external representation of national interests is affected by the relationship between the international and the domestic level. More specifically, we study the representation to the SPS Committee as a reflection of how food safety is integrated in and around the WTO, as well as internally in the Canadian and EU food safety regulatory frameworks.

We also discuss briefly the implications of different organizational solutions, and we develop an argument that suggests that a close match between the domestic and the international level in terms of food safety policy integration can contribute to strengthening the international regulation of food safety by bringing together

relevant and coordinated actors and agendas in a more effective multi-level framework. From a domestic perspective, a match between the two levels may also provide opportunities for states to exert influence and international leadership in a world where food safety concerns often differ.

Canada and the EU are suitable comparators for several reasons. Most importantly, though, both have adopted food safety policy integration as central objectives during the last decade (Ugland and Veggeland, 2004). We study the interaction between recent developments in food safety policy integration at different levels. As a point of departure for our analyses, the next section outlines the theoretical underpinnings for this study, and situates it in relation to the established literature on policy integration. Section 3 describes how food safety is integrated internationally in and around the WTO. Section 4 outlines how Canada and the EU have organized their representation to the SPS Committee. Organizational differences in representation are discussed in light of how food safety policies are integrated internally in the Canadian and the EU regulatory frameworks. Section 5 concludes with an evaluation of the theoretical and empirical implications of the study for the organization of representation of food safety interests at the international level.³

2. Food Safety Policy Integration and International Representation

Food safety is a crosscutting policy issue, and it is marked by an inherent tension between domestic health and consumer protection on the one hand, and international trade liberalization on the other. Operating within a global system for food imports and exports, governments are faced with a double challenge; i.e. to formulate effective health oriented food safety policies that are compatible with international free trade commitments, as well as to ensure early consideration of health and food safety concerns in the formulation and enforcement of trade policies. In response to this challenge, policy integration has become an increasingly fashionable concept among policy-makers with responsibility for food safety over the past decade (Ugland and Veggeland, 2004; 2006).

An integrated policy means a policy where the constituent elements are brought together and made subject to a single, unifying conception (Underdal, 1980: 159). Thus, the notion of policy integration can be defined and analysed in terms of consistency, interdependence, and structural connectedness (March, 1999;

³ The paper draws on documentary information and semi-structured interviews with key informants in Canada and the EU, as well as on our observations as participants at Codex Commission and WTO SPS Committee meetings in 2003 and 2006 respectively.

Ugland, 2003). These three criteria can be said to refer to different aspects of policy-making processes: consistency to the policy outputs (are the various policy activities coherent from the point of view of a specific objective?); interdependence to the causal linkages between the policy components (are the various policy activities inter-linked and causally linked with this objective?); and structural connectedness to the inter-institutional relations (how are the various actors and institutions that are involved in the formulation and enforcement of these policies coordinated in terms of authority, responsibility and information structures?).

Based on this, food safety policies can be seen as integrated to the extent that the various policy components are coherent and inter-linked with the objective of ensuring safe food and protecting public health, and inasmuch as this objective penetrates all relevant policy sectors and all levels of government (Ugland and Veggeland, 2004: 106). Tightly integrated food safety policies can in this way contribute to reduce the level of food-borne diseases through better coordination. However, growing internationalization poses additional challenges for policy-makers, as international food standards and regulations can constrain domestic policy options.

The basic objective of food safety policies is the protection of the health of consumers. Despite this, food safety policies are often controversial both domestically and internationally. One source of conflict is that food safety is a crosscutting policy issue that is of relevance to different sectors such as health, agriculture, fisheries, industry, and trade. Food regulations also concern non-health objectives such as food quality, fair trade and free competition (Hankin 1997), and there are many examples of long-lasting disputes over the purpose, severity and instrumentation of these regulations (Josling et al. 2004). Food safety policy integration is assumed to improve policy outcomes, but also to reduce the level of conflict. Due to both cognitive and political reasons, public policies that are tightly integrated around the overriding objective they are intended to promote and protect tend to be met with increased understanding across different sectors and levels of government than more loosely integrated ones (Ugland, 2003). Based on this logic, it can also be assumed that food safety policies that are tightly integrated around the overriding health objective will be easier to justify vis-à-vis international organizations and partners in international rules and standard-setting bodies. Tightly integrated food safety policies are namely directed towards achieving what can be referred to as an appropriate level of health protection. Both “overprotection” and “underprotection” can be seen as a result of a lack of policy integration. Overprotection may, for instance, occur when strict food safety regulations are imposed on foreign foods in order to satisfy domestic agricultural and producer interests, i.e. health is used only as an excuse for trade protection. Underprotection occurs when domestic trade ambitions and/or international trade commitments permit sales of unsafe foods, i.e. when trade considerations override genuine and important health considerations. In both cases, the health objectives take the backseat vis-à-vis other interests. Achieving an appropriate level of health

protection from food-borne illnesses requires coordination and integration across levels of government.

We analyse the Canadian and the EU external representation to the WTO SPS Committee in light of how food safety is integrated internationally and internally.

3. Food Safety Policy Integration In and Around the WTO

This paper focuses on the role of food safety in the most important global intergovernmental organization regulating world food trade, the WTO (Echols 2001; Josling et al. 2004). In this section, we study how food safety concerns are integrated in the WTO, as well as the links between the WTO and other intergovernmental bodies involved in food safety rules and standard-setting at the international level.

The predecessor to the WTO, the General Agreement on Tariffs and Trade (GATT), was established in 1947 in order to promote reduced tariffs and other barriers to trade, and to eliminate discrimination in international commerce. Although trade liberalization was its main goal, GATT also recognized certain considerations as legitimate, such as health protection. An important provision in this respect was GATT Article XX, item (b), which stated that nothing in the agreement should be construed to prevent members from adopting or enforcing measures that are necessary to protect human, animal or plant life or health. However, the GATT regime included few institutional mechanisms and rules on how to reconcile legitimate food safety goals with trade promotion (Skogstad, 2001a).

During the Tokyo Round negotiations (1973-79), growing attention was drawn to the so-called non-tariff barriers to trade, including trade restrictive sanitary, phytosanitary and technical measures. A number of provisions aimed at regulating these measures were included in a new plurilateral agreement called the Standards Code or the Technical Barriers to Trade Agreement.⁴ This agreement covered national product regulations, standards and conformity assessment procedures adopted to promote food safety, health, environment and a wide range of other objectives.⁵ This implied that food safety, together with a number of other measures, became included in a separate agreement regulating non-tariff aspects of food trade.

⁴ That the Standards Code was a plurilateral agreement means that the agreement applied to the limited number of GATT members that chose to sign it.

⁵ Conformity assessment procedure is as a procedure for testing and certifying compliance with regulations and standards (WTO Secretariat, 1999: 72).

Today, the WTO is, with its 149 members and its comprehensive set of trade rules, the most influential organization regulating world trade, including trade in foods. The WTO provides a common institutional framework for the conduct of trade relations among its members. However, as reflected in the Uruguay agreements, the establishment of the WTO signaled a more dedicated commitment to the relationship between trade and health than GATT, and past liberalization efforts, had done. During the Uruguay Round (1986-93) several new agreements relevant for food regulation were negotiated. Contrary to the Standards Code, these agreements apply to all WTO members. The new agreements most relevant for food regulation are the Agreement on Technical barriers to Trade (TBT Agreement) covering technical measures, the Agreement on Trade-Related Aspects of Intellectual Property Rights (TRIPS Agreement) covering, among other issues, the protection of geographical indications for goods, and the SPS Agreement containing rules for countries which want to restrict trade to ensure food safety and the protection of human life from plant or animal carried diseases and animal and plant health. Thus, the Uruguay Round resulted in a horizontal specialization of the food safety area in the WTO through the separation of the SPS area from other policy areas, and through the establishment of a separate agreement and a unique institutional framework dealing with food safety.

An important element of the SPS Agreement is that it names three intergovernmental standard-setting bodies as reference points that WTO members should take into account when implementing SPS measures that affect trade. Codex Alimentarius Commission (Codex) is the reference point for food safety, the World Organisation for Animal Health (OIE) for animal health and zoonoses, and the International Plant Protection Convention (IPPC) for plant health (Dawson 1995; Veggeland and Borgen 2005; Victor 2000). The establishment of the WTO resulted in increased international status and profile for these three bodies, which are commonly referred to as “the three sisters”.

The SPS Agreement explicitly states that WTO members shall play a full part within the limits of their resources, in the activities of Codex, OIE and IPPC (Article 3), and it defines the international standards, guidelines and recommendations that are relevant for the Agreement as those that have been developed by these bodies (Annex A). Thus, standards produced by “the three sisters” have become explicitly integrated in the WTO’s framework for regulating food trade.

The Codex was created in 1963 by the World Health organization (WHO) and the Food and Agriculture Organization (FAO) of the United Nations (UN). Codex is the single most important international body responsible for adopting food standards, including food safety standards, with 173 member states in 2005 (Veggeland and Borgen 2005). The objectives and purposes of Codex are stated in the statutes. The top decision-making body is the Codex Commission, where all members are represented. The Commission decides on the adoption of new voluntary food

standards. Codex is organized into horizontal and vertical committees, which handle different aspects of the food standards area, as well as ad hoc task force groups, which handle more pertinent issues. Vertical committees deal with product-specific standards (e.g. the fisheries committee), whereas horizontal committees deal with cross-sectoral standards (e.g. hygiene committee). After a step-for-step decision-making process, standards are adopted or rejected by the Codex Commission. Consensus is in practice the rule, but the Codex procedures can lead to a vote. Although commercial interests always have been taken into consideration, the main purpose of Codex is to adopt international standards that are well fit to protect the health of the consumers, while at the same time facilitate global food trade.

OIE was established as early as in 1924, and it counts 167 member countries. The most important bodies of the OIE are the International Committee, the Specialist Commissions and Working Groups, and the central Bureau. The International Committee is the highest authority, and it meets at least once a year. Since it was created, the OIE has collaborated directly with the Veterinary Services of the member states, and has played a key role in its capacity as the sole international reference organisation for animal health. Its objectives include ensuring transparency in the global animal disease and zoonosis situation, the collection, analysis and dissemination of scientific veterinary information, and, within its mandate under the SPS Agreement, the safeguarding of world trade by publishing health standards for international trade in animals and animal products. In recent years, the OIE has been provided a new mandate by the member countries, namely to provide a better guarantee of food of animal origin and to promote animal welfare through a science-based approach. In order to follow up this mandate, the members have emphasised the strong links between the activities of the OIE and those of the Codex.

The IPPC is an international convention under the UN, and it came into force in 1952. By August 2005, the governments of 139 states had signed the Convention. Although it is realized that the IPPC has strong implications for international trade, it is stressed that international cooperation for plant protection constitutes the main focus. Thus, the aim of the convention is to secure action to prevent the spread and introduction of pests of plants and plant products, and to promote appropriate measures for their control. IPPC is governed by the Interim Commission on Phytosanitary Measures (ICPM), which adopts International Standards for Phytosanitary Measures (ISPMs). In 1997, a revised text of the IPPC was approved. This revision was undertaken to reflect contemporary phytosanitary concepts and to take into consideration the new role of the IPPC in relation to, in particular, the SPS Agreement. Thus, in the new Preamble to the Convention, formulations were included that state that the Convention takes into account internationally approved principles governing not only the protection of plant health, but also human and animal health. In fact, the Preamble explicitly mentions the WTO SPS Agreement.

Thus, food safety measures relevant for world trade are regulated internationally by the WTO, and by three predominantly science-based forums for standardization - the Codex, the OIE and the IPPC. The intersection between the WTO and these three bodies is therefore crucial with respect to international food safety developments. The main purpose of linking the voluntary standards of Codex, OIE and IPPC to the mandatory rules of the WTO was to ensure that food safety policies are integrated in the regulation of international food trade, and to ensure that health objectives are taken care of while at the same time avoiding unnecessary barriers to trade.

The setting up of the WTO SPS Agreement, as well as its linkages to the three sisters, has contributed to the development of a more integrated food safety system at the international level. Consumer's health and food safety has become the single, unifying conception. This can be illustrated by revisiting our criteria for food safety policy integration. In terms of policy consistency, food safety policies are consistent when the overriding health objective is uncompromised by other objectives. The SPS Agreement requires that SPS measures be applied for no other purpose than that of ensuring food safety and animal and plant health. Food safety policies are interdependent when there are firm and obvious links between the various policy measures and the health objective pursued. Interdependence therefore deals with the question of the individual contribution or necessity of the various policy measures. The issue of proportionality between policy measures and objectives can be viewed in this context. The SPS Agreement clearly states that governments shall select SPS measures that are not more trade restrictive than required to meet their health objectives. WTO is not the only actor involved in the formulation and enforcement of international food safety rules and standards, and food safety policies are structurally connected when the various institutions involved are coordinated in their efforts at achieving safe food. As we have illustrated, the relationship among the WTO SPS Committee, Codex, OIE and IPPC are characterized by many tight linkages. We shall now take a closer look at how Canada and the EU have organized their external representation to the WTO SPS Committee, as well as to the three sisters in light of these international developments.

4. Food Safety Policy Integration and International Representation: The Cases of Canada and the EU

Canada and the EU are among the world's largest traders, and they are partners in the efforts to liberalise world trade. However, both Canada and the EU have stressed the importance of reconciling their roles in the international trading system with the objective of protecting consumer's health and food safety, and they participate actively in the WTO SPS Committee and in the three intergovernmental standard-setting bodies referenced by the WTO.

Canada's relations with the WTO SPS Committee are managed by an Interdepartmental Committee, whose main task is to prepare for the SPS Committee meetings in order to make sure that Canadian health and safety objectives are taken into account in the negotiations and implementation of free trade agreements. The composition of this committee depends upon the agenda, but the main institutions represented are the Canadian Food Inspection Agency (CFIA), Health Canada (HC), Agriculture and Agri-Food Canada (AAFC), International Trade Canada (ITC) and Environment Canada (EC).⁶ The purpose of the WTO is to facilitate trade, and ITC leads Canada's participation to most WTO committees. However, this is not the case with the SPS Committee, which has been led by the CFIA since 1997.⁷

Canadian participation in the Codex is also managed by an Interdepartmental Committee. The composition of this committee is formally outlined in its "Terms of Reference", and it includes the CFIA, HC, AAFC and ITC (Health Canada, 2006). This committee has a number of responsibilities, ranging from endorsing the composition of the delegations, to the authorization of Canadian positions developed for Codex sessions. In terms of administration and management, HC is the Codex Contact Point for Canada, and has the overriding responsibility for coordinating the Canadian program for the Codex Commission. However, the coordination of Canada's participation in the Codex is shared between two institutions, as the Chair of the Interdepartmental Committee rotates between HC and the CFIA. Besides the responsibility for chairing the meetings of the Interdepartmental Committee, the Chair is Head of the Canadian delegation to Codex Commission meetings.

The CFIA leads Canada's participation to the OIE and the IPPC. The Executive Director of the Animal Products Directorate at the CFIA, who also serves as the Chief Veterinary Officer of Canada, is the official Canadian delegate to the OIE. The International Standards Adviser in the Plant Health Division under the Plant Products Directorate at the CFIA is the official IPPC Contact Point for Canada.

⁶ The membership of the interdepartmental committee to the SPS Committee is flexible. For instance, the Canadian International Development Agency (CIDA) is often invited to participate when the agenda includes international development and foreign aid issues.

⁷ It was Agriculture and Agri-Food Canada that led the Canadian participation before the CFIA was established in 1997 (Interview with member of the Canadian delegation to the WTO SPS Committee, Geneva, February 2006).

In line with the international developments described above, Canada's representation to the WTO SPS Committee, Codex, OIE and IPPC is based on a partnership model, and it seems to be well coordinated and structurally connected. For instance, the interdepartmental committees to the SPS Committee and Codex are tightly linked in terms of overlapping memberships. This cross participation is important in order to ensure awareness of issues that are of mutual interests among different institutions. The relationship between the CFIA and HC is of particular importance.

Despite these partnerships, the CFIA constitutes the nucleus of the international representation of Canadian food safety interests. Based on the central position the CFIA holds in the domestic regulatory framework, this role may seem justified. However, we argue that the centrality of the CFIA represents a challenge in terms of achieving a truly integrated approach to the international level. First of all, the CFIA represents Canada in the WTO SPS Committee based on what can be referred to as dual mandates (Ugland and Veggeland, 2004). The CFIA reports to the Minister of Agriculture and Agri-Food Canada, and it adopted the following mission statement when it was established in 1997: "Our Mission: Safe food, Market access and Consumer protection" (CFIA, 1998). Although the linkages between health and trade objectives are obvious, i.e. safe food is good for business and trade, it is in cases of conflicts between the health and trade objectives that these dual mandates may become problematic. Secondly, the fact that there is a rotating chair of the Interdepartmental Committee on Codex between the CFIA and HC implies that the Canadian activities vis-à-vis the Codex are not bound by a cohesive ministerial oversight, as the CFIA reports to Parliament through the Minister of Agriculture and Agri-Food, and HC to the Minister of Health. Both of these aspects may be seen as sources of inconsistencies in the external representation of Canadian food safety interests at the international level.

Canada's organization of its external representation in the food safety area, with the CFIA as the key actor, is problematic from a policy integration perspective where the health of the population is paramount. Instead, the mandate and activities of the CFIA are based on a complex mix of health and consumer protection objectives on the one hand, and trade objectives related to the promotion market access for Canadian exports on the other. In meeting those mandates, the CFIA both speaks on defensive and offensive interests in WTO SPS Committee meetings. This implies that it is the role of the CFIA to justify the Canadian use of SPS measures in order to protect consumers' health and food safety vis-à-vis other members, as well as to challenge the validity of SPS measures adopted by other members due to Canadian trade concerns. As we now shall see, the EU has organized the international representation of their food safety interests differently.

The EU has been an autonomous actor in trade policy since the Treaties of Rome (Meunier 2005: 5).⁸ The EU was a full member of GATT, and is presently a full member of the WTO. This implies that EU representatives, normally the European Commission, speak on behalf of all the member states in WTO meetings. The EU member states are also members of the WTO, and although they also participate in WTO meetings, they are not allowed to speak on those matters that are within the competence of the EU institutions.

Originally, the representation of EU food safety interests at the international level could be seen as problematic from a policy consistency perspective. Similar to the Canadian case, the food safety system in the EU was based on a complex mix of health objectives and trade objectives. When the SPS Agreement entered into force in 1995, it was DG Agriculture in the European Commission that was responsible for the SPS area, and thus headed the EU delegation to the SPS Committee meetings and acted as an enquiry point under the agreement. DG Trade was also part of the delegation. The same pattern could be seen in relation to the Codex, where DG Agriculture and DG Industries/Enterprise formed the nucleus of the EU representation.⁹

Following the extensive reforms of the EU's food safety regulatory frameworks after the BSE crisis hit the EU in the mid-1990's (Vos, 2000; Ugland and Veggeland, 2006), the organization of the EU's international representation in the food safety area changed dramatically. DG Health and Consumer Protection (also referred to as DG SANCO) took over the responsibility for representing EU food safety interests at the world stage. Today, DG SANCO leads EU's participation to

⁸ The term the European Union (EU) is associated with the Maastricht Treaty on the European Union which became effective on November 1, 1993. Although trade falls under the European Community (EC) pillar, for simplicity, the abbreviation "EU" will throughout this article be used in the general discussions and analyses throughout this paper.

⁹ Until 2003, the EU only had observer status in Codex. Thus, it was a representative from one of the member states who spoke on behalf of the EU on those areas covered by EU law. After the EU became full member of Codex in 2003, the Commission speaks on behalf of the member states on areas covered by EU law. However, in contrast to the SPS Committee, the member states are allowed to take part in the discussions in Codex meetings.

the WTO SPS Committee, as well as the EU activities towards Codex, OIE and IPPC.¹⁰

DG SANCO is head of the EU Delegation to the SPS Committee and normally attends meetings together with delegates from DG Trade. As a rule, the two DGs share the SPS work between them in the following way: DG SANCO has the superior responsibility for EU's SPS work and speaks on those matters that are related to explaining EU's food safety policies and defending adopted SPS measures applied against other WTO members. DG Trade is only involved when the EU raises trade concerns regarding other WTO members' SPS measures. This division of work illustrates the EU's attempts at achieving a complete separation, institutionally, between the promotion of food safety and health interests on the one hand, and commercial and trade interests on the other. Thus, as is the case for the food safety work internally in the EU, DG SANCO works towards the SPS Committee within the single mandate of health and consumer protection, whereas DG Trade takes care of the trade mandate of promoting market access for the EU's exports.

Thus, Canada and the EU have chosen different organizational solutions with regard to the representation of their food safety interests at the international level. Although both have developed a more coordinated and structurally connected approaches in response to how food safety is integrated in and around the WTO, the EU's international representation is more integrated in terms of policy consistency where the health of the population is paramount. The EU has actively made an attempt at institutionally divorcing health and consumer protection from trade and commerce interests with relevance to food. In Canada, the separation between the different objectives is less clear, as it is the same institution that is responsible for promoting both interests at the international level.

In order to understand these differences, we have to take a closer look at the organization of the internal food safety regulatory frameworks. In the EU, the BSE crisis contributed significantly to the process of integrating food safety policy more tightly in terms of consistency, interdependence and structural connectedness over the last decade (Ugland and Veggeland, 2004; 2006). This crisis removed cognitive, institutional as well as political barriers to the policy integration process, and food safety and health concerns were put at the centre. DG SANCO, which operates under the single mandate of health and consumer protection, was given the undisputed leading role over all aspects related to food safety, including

¹⁰ The European Union became a Party to the IPPC as late as on 6 October 2005. It is still not a member of OIE, but through an exchange of letters in 2004, it has established official relations with the OIE and participates in OIE meetings as an observer.

internal coordination and preparation of new policies and legislation, and external representation vis-à-vis the international level. The Canadian food safety system is less integrated from the objective of ensuring safe food and protecting public health. The establishment of the CFIA is a result of an attempt to “improve the effectiveness and cost efficiency of the federal component of the Canadian food inspection system”, as expressed in the Federal Budget of February 1995. In absence of a major food safety crisis comparable to the BSE crisis in Europe, and in a context where politicians actively sought to stimulate industry in order to get the Canada out of the recession, it was from the very start decided that the CFIA should try to reconcile health and consumer protection, with the aim of facilitating trade in food, animals, and plants, and their products (CFIA 1998; see Uglund and Veggeland, 2004).

5. Conclusion

This study illustrates that the organization of the international representation of Canadian and EU food safety interests must be viewed in light of both internal and external developments. We saw that both Canada and the EU have established a more coordinated and structurally connected framework for international representation based on how food safety has become more integrated in and around the WTO. However, we also identified some fundamental differences in organization based on how food safety was integrated internally in the Canadian and EU regulatory frameworks. The main difference identified was that the external representation of EU food safety interests at the international level seemed more integrated around the overriding health objective than in the Canadian case. In Canada, the CFIA was identified as the nucleus of the international representation, and this institution operates under a dual mandate of ensuring market access for Canadian food products and protecting consumer’s health. In the EU case, DG SANCO operates under a single mandate of health and consumer protection.

The EU organization of the external representation seems to be more in line with the developments at the international level, where food safety has become more integrated around the health objective in terms of consistency, interdependence and structural connectedness. The match between the domestic and the international level in terms of food safety policy integration is assumed important, as it may contribute to bring together actors that share the same overriding objective in a more coordinated multi-level framework. This can in turn strengthen the international regulation of food safety.

To what extent some organizational solutions can be considered as more effective than others in promoting domestic food safety interests at the international level is an empirical question that has not been investigated in this paper. However, we have argued that some organizational forms may be more appropriate than others given the legitimate objectives pursued. Based on cognitive and political

considerations, we assume that an international representation of domestic food safety interests that is consistent, interdependent and structurally connected around the overriding health objective they are intended to promote is likely to be perceived as more legitimate and be met with increased understanding at the international level. This may in turn create possibilities for increased leverage over international food safety developments. This would imply that the EU has put in place a consistent, interdependent and structurally connected system for external representation which seems well suited for effective promotion of their food safety interests on the world stage.

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