

**Understanding the influence of differences between implementations of
control systems at street level bureaucrats' level on the quality of
Protected Designation of Origin products**

MSc Thesis

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Sara Pasin

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Executive summary

This work deals with the products recognized by the European Union for their protected designation of origin. PDO covers agricultural products and foodstuffs which are produced, processed and prepared in a given geographical area using recognised know-how.

The EU Parliament highlights that the degree of protection of designations of origin varies between Member States¹ and it “advocates legislative and procedural harmonisation in this field especially for the rules on ex officio protection”. Thus, taking the subject of official controls, even though each Member State has its own bodies and/or competent authorities recognized by European Union, the systems may vary between different countries.

This work aims at understanding the factors influencing the implementation of the control system at street-level bureaucrats’ level of the EU legislation on PDO products, and whether dissimilarities between performances of the front-line workers between different Countries lead to variations in the quality between PDO products of different EU Member States (the term of “street level bureaucrats”, as well as “front-line workers”, refers to the people who actually implement policies. The performance is considered in terms of guarantee of characteristics established in the Specification²).

This thesis consists of four major parts, namely the appreciation phase (theory analysis), the analysis phase (conceptual model and indicators), the assessment phase (bottlenecks and solutions) and the evaluation phase.

Theory Analysis: the initial situation is analysed by taking a techno-managerial approach, so that both perspectives are considered and the problem can be wholly comprehended. Thus, the theory analysis starts by showing different aspects determining product quality. Explanations about the EU legislation regarding requirements for the Specification and official controls follow. Then, the managerial models come out. Firstly the hierarchical levels of the policy implementation are described, followed by the description of differences between vertical and horizontal alignment.

¹ European Parliament resolution of 10 March 2009 on ensuring food quality, including harmonisation or mutual recognition of standards (2008/2220(INI))

² A Specification is an explicit set of requirements to be satisfied by a material, product, or service (ASTM definition)

The theory analysis has been used to formulate problem definition, hypothesis, research objective and research questions.

Analysis: in this part of the thesis, a profound literature review is conducted. It mainly focuses on the factors influencing the implementation of the control system “at the shop-floor level” and it leads to the construction of a conceptual research model. Considering the implementation process within each Member State, the outcome is the performance of the street level bureaucrats, as they are the actual enforcers of the control activities which intend to assure the product characteristics listed in the Specification. The successful performance of the inspectors is the result of their decisions, which are dependent on both technological and managerial factors, classified as legal framework, organizational factors, personal background and quality of the Control Plan. The different outcomes will in turn influence the horizontal alignment between different EU countries in the interpretation of the quality for the PDO products. The comparison of the street level bureaucrats’ performances is used to understand at what extent this variation occurs.

Based upon the theoretical findings, operational indicators are identified for each element in order to evaluate them into practice. A case study is realized in order to obtain data and validate the conceptual research model. Questions are formulated for each indicator, a questionnaire is developed and semi-constructed interviews are addressed to the actors involved in the control system of the cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and United Kingdom. They are both blue veined moulded cheeses but they belong to different countries and thus dissimilarities in the implementation of the control system at street level bureaucrats’ level may be found, expressed in differences in product quality. Also an expert in dairy sector and EU legislation is contacted to evaluate the control activities set up in both Italian and English Control Plans.

The collected data are used to identify the bottlenecks and thus to propose suggestions for improvements.

Bottlenecks and solutions: based upon the findings, bottlenecks are defined for both Italian and English control systems, as well as the horizontal alignment. The main problem seems to refer to the clarity of the documents and guidelines translating the European rules. However, it does not lie in the establishment of the control activities, but it has to be gone back to the EU definition of the requirements for writing the Specification. When the legislation is not clear, then also the

Specification will result not detailed and precise enough to perform controls. The level of the Italian street level bureaucrats' performances results to be high, while the English outcome is identified as low. As a consequence, the low degree of horizontal alignment has been determined. In order to improve a uniform approach in the control systems, the European Union should review its PDO policy, by redefining clearly the principles, establishing how they should be implemented and thus inspected.

Evaluation: at the end, the whole work has been evaluated and an overall conclusion is given on the basis of the hypothesis initially presented.

The hypothesis is accepted, even though a complex situation has been detected. The state of non-uniformity of quality between PDO products has been identified, as the high Italian performance was not in line with the low performance of the English inspector, according to the indicators defined in the research model.

However, even though the Italian outcome has been considered as high, it does not automatically lead to the high alignment with the EU requirements regarding the quality of PDO products fixed in the Reg. (EC) 519/2006, as the whole work did not consider dissimilarities in the Specifications, which must be recognized by the European Union in order to obtain the recognition of the PDO product and thus they were considered matters of fact.

Finally, recommendations for further research has been provided. It is suggested 1) to include an EU Member State of the East Europe for a possible detection of additional divergences and 2) to firstly study and then consider the actual organization of the European Union and its economic disposal for providing useful suggestions.

Table of contents

Acknowledgments.....	ii
Executive Summary.....	iii
List of tables and figures.....	vii
1 Introduction	1
1.1 Introduction to the problem.....	1
1.2 Problem feeling	2
1.3 Research background.....	3
1.4 Problem definition	12
1.5 Hypothesis.....	13
1.6 Research objective.....	13
1.7 Research questions	14
1.8 Research approach and planning.....	14
2 Theory analysis	15
2.1 Quality concept in PDO product	15
2.2 Certification systems	17
2.3 Role of official certifiers	20
2.4 Factors influencing implementation of the control system “at the shop-floor level”	21
3 Research model and indicators	28
3.1 Research model	28
3.2 Indicators	31
3.3 Street level bureaucrats’ performances.....	39
3.4 Horizontal alignment	41
4 Research method and design	43
4.1 Research methodology	43
4.2 Research design	44
4.3 Data collection.....	47

5 Analysis and results.....	51
5.1 Italy	51
5.2 United Kingdom.....	63
5.3 Horizontal alignment	72
6 Bottlenecks and solutions	74
6.1 Bottlenecks.....	74
6.2 Suggestions.....	79
6.3 Judgement of suggestions	83
7 Evaluation	87
7.1 Theory analysis	87
7.2 Conceptual research model and indicators	89
7.3 Research methodology and analysis.....	89
7.4 Assessment.....	91
7.5 Final conclusion	91
7.6 Recommendations	93
References	94
Appendixes	98
Appendix 1. Presentation letter for the certification bodies	98
Appendix 2. Presentation letter for the participant	99
Appendix 3. Questionnaire for the inspectors	100
Appendix 4. Questionnaire for the supervisors	102

List of tables and figures

Figure 1.1 Food quality relationship (Luning and Marcelis, 2009)	4
Figure 1.2 Intrinsic-extrinsic quality attributes model (adapted from Luning and Marcelis, 2009)....	5
Figure 1.3 Procedures to register a product name (adapted from http://ec.europa.eu/agriculture/quality/schemes/index_en.htm)	6
Figure 1.4 Policy implementation: relevant hierarchical levels for systemic evaluation (adapted from Rametsteiner and Weiss, 2005)	9
Figure 1.5 Vertical and horizontal alignment (adapted from Schmithüsen, 2004)	11
Figure 2.1 Conceptualising quality (adapted from Ilbery et al., 2000)	16
Figure 2.2 Basic structure of certification (adapted from Albersmeier et al., 2009).....	18
Figure 3.1 Conceptual research model. “SLB” stands for street-level bureaucrats; “PDO” stands for Protected Designation of Origin.	30
Table 3.1 Operational indicator for the perceived degree of the clarity of the documents and guidelines translating EU rules.....	33
Table 3.2 Operational indicator for the degree the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification	33
Table 3.3 Operational indicator for the supervisors’ leadership behaviour.....	34
Table 3.4 Operational indicator for the perceived degree of availability of resources and training	35
Table 3.5 Operational indicator for the degree of satisfaction with the presence and use of incentives and promotions	36
Table 3.6 Operational indicator for the degree the presence of organizational practices aimed at influencing the relation regulator/regulated firm	37
Table 3.8 Operational indicator for the professional learning and training.....	38
Table 3.9 Operational indicator for the degree of individual social norms.....	39
Table 3.10 Operational indicator for the degree of assurance of PDO characteristics established in the Specification.....	40
Table 3.11 Operational indicator for the degree of horizontal alignment	42
Table 4.1 Cheeses: Gorgonzola DOP and Blue Stilton PDO	44
Table 5.1 Results regarding the perceived degree of the clarity of the documents and guidelines translating EU rules (Italy).....	53
Table 5.2 Results regarding the supervisors’ leadership behaviour (Italy)	54
Table 5.3 Results regarding the perceived degree of availability of resources and training (Italy) ..	56

Table 5.4 Results regarding the degree of satisfaction with the presence and use of incentives and promotions (Italy)	57
Table 5.5 Results regarding the presence of organizational practices aimed at influencing the relation between regulator and regulated firm (Italy)	58
Table 5.6 Results regarding the degree of street level bureaucrats' perception of communal moral norms (Italy).....	59
Table 5.7 Results regarding the degree of school achievement/working experience and attended training programme (Italy).....	59
Table 5.8 Results regarding degree of street level bureaucrat's perception of the meaningfulness of their work (Italy)	60
Table 5.9 Results regarding degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the specification (Italy)	62
Table 5.10 Results regarding the degree of assurance of PDO characteristics established in the Specification (Italy).....	62
Table 5.11 Results regarding the perceived degree of the clarity of the documents and guidelines translating EU rules (United Kingdom)	64
Table 5.12 Results regarding the supervisors' leadership behaviour (United Kingdom)	64
Table 5.13 Results regarding the perceived degree of availability of resources and training (United Kingdom)	65
Table 5.14 Results regarding the degree of satisfaction with the presence and use of incentives and promotions (United Kingdom)	66
Table 5.15 Results regarding the presence of organizational practices aimed at influencing the relation between regulator and regulated firm (United Kingdom)	66
Table 5.16 Results regarding the degree of street level bureaucrats' perceptions of communal moral norms (United Kingdom)	66
Table 5.17 Results regarding the degree of school achievement/working experience and attended training programme (United Kingdom)	67
Table 5.18 Results regarding degree of street level bureaucrat's perception of the meaningfulness of his work (United Kingdom)	68
Table 5.19 Results regarding degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the specification (United Kingdom).....	70

Table 5.20 Results regarding the degree of assurance of PDO characteristics established in the Specification (United Kingdom)	71
Table 5.21 Operational indicator for the degree of horizontal alignment between Italy and United Kingdom	73
Figure 6.1 Horizontal misalignment at national level	78
Table 6.1 Judgment of suggestions based upon the criteria	84
Table 6.2 Judgment of suggestions based upon the criteria of “low investment” and “easy to implement”.....	85

1 Introduction

1.1 Introduction to the problem

The European Union (hereafter EU) has been building a set of regulations to clarify its agricultural products quality policy. Firstly, this group of guidelines aims at improving the communication between farmers, buyers and consumers as it regards agricultural product quality. Moreover, it aspires the harmonisation of European Union rules on the quality of these products. Finally, it plans the improvement and simplification of existing schemes and labels. However, the effectiveness of the European legislation is dependent on how it is interpreted by and enforced in each Member State.

A constantly increasing number of consumers is becoming more aware about the quality of food stuffs rather than quantity. Not only organoleptic properties of the food are taken into account by the consumers, but also extrinsic quality attributes, such as place of farming or production, production method, type of animal husbandry, use of processing techniques (COM(2009)234final). Following this inclination, the European Union has been refining its policy, in order to facilitate information flow within the agro-food chain and to help consumers to make informed choices. Special attention is given to certification and labelling, as both of them can be used to indicate added-value characteristics of the products beyond the baseline standards.

“Certification-type” schemes include products defined as PDO (protected designation of origin), PGI (protected geographical indication) and TSG (traditional speciality guaranteed). PDO covers agricultural products and foodstuffs which are produced, processed and prepared in a given geographical area using recognised know-how. PGI covers agricultural products and foodstuffs closely linked to the geographical area; at least one of the stages of production, processing or preparation takes place in the area. TSG highlights traditional character, either in the composition or means of production.

All these products are ruled in two regulations, Reg. (EC) 510/2006 and Reg. (EC) 509/2006, although they encompass completely different agricultural products and food stuffs, as specified in the article 1 of the Reg. (EC) 510/2006, which refers to the Annex I to the Treaty and Annexes I and II of the same regulation for the list of these products. They lay down rules on product

specifications, on the iter for the registration, on the relation between trademarks and these protected products and on the official controls. When there are no objections and a product Specification is approved by the European Union, the terms “protected designation of origin” and “protected geographical indication” or the related EU symbols must be included on the labelling of the product in order to provide consumers with “clear and succinct information regarding the product origin” (Reg. (EC) 510/2006, principle 4) so that they can make informed choices, and “to permit easier identification of these products on the market so as to facilitate checks”(Reg. (EC) 510/2006, principle 5). From the registration of the name onwards, the product requirements and all the stakeholders involved in its production should be constantly checked through official controls planned by authorities/control bodies and competent authorities, respectively for the respect of Specification and on the marketplace (Art. 10-11 of Reg. (EC) 510/2006).

In this way, the European Union aims at providing a more uniform approach for the development of PDO and PGI products, such as a framework which “ensures fair competition between the producers of products bearing such indications and enhances the credibility of the products in the consumer's eyes” (Reg. (EC) 510/2006, principle 6).

1.2 Problem feeling

The Reg. (EC) 510/2006 and all the reference legislation make rules when dealing with agricultural products with protected designations of origin. The European Union has established: 1) what should be listed in the Specification, 2) that “Member States shall designate the competent authority or authorities responsible for controls in respect of the obligations established by this Regulation in conformity with Reg. (EC) 882/2004³” and 3) that they also “shall ensure that any operator complying with this Regulation is entitled to be covered by a system of official controls”. The Commission makes public the name and address of these authorities and bodies operating as product certification body⁴, which shall ensure verification of compliance with the Specification also before placing the products on the market (Art. 11 of the Reg. (EC) 510/2006).

³ Reg. (EC) 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules. The competent authority is defined as “the central authority of a Member State competent for the organisation of official controls or any other authority to which that competence has been conferred” (Art. 2).

⁴ Article 2 of Reg. (EC) 882/2004: “«control body» means an independent third party to which the competent authority has delegated certain control tasks”

However, the EU Parliament highlights that the degree of protection of designations of origin varies between Member States⁵ and it “advocates legislative and procedural harmonisation in this field especially for the rules on ex officio protection”. In other words, while the European Union suggests the protection of the same quality attributes in diverse food products, the European consumers are facing with different national interpretations of the same legislation, and thus also with dissimilar qualities. The uniform recognition of these characteristics seems to be missing among the Member States.

Even though the problem may regard all the three EU certification-type schemes (PDO, PGI and TSG), this thesis will only deal with the PDO products, as they represent the largest portion among the abovementioned groups of products (PDO: 638; PGI: 594; TSG: 53⁶).

Taking the subject of official controls, although each Member State has its own bodies and/or competent authorities recognized by European Union, the systems may vary between different countries. As a consequence, different degrees of the assurance of product quality could come out. In fact, dissimilarities in the management of official controls according to national organizations may create variations in the interpretation of the meaning of quality for the products with “protected designation of origin” recognition between different EU Member States.

1.3 Research background

Food quality can be affected by both food and human behaviour (fig. 1). Food behaviour depends on food dynamics -variability of product properties- and on technological conditions. Instead, human behaviour is the sum of human dynamics -variability of decision making behaviour related to food quality management issues-, and administrative conditions -procedures, responsibilities and information system (Luning and Marcelis, 2009). In this study, a techno-managerial approach will be used to identify the mechanisms to be considered in order to analyse and understand how quality of PDO products is affected by both technical as well as managerial aspects. I will focus on human behaviour and food behaviour with regard to the implementation of European legislation

⁵ European Parliament resolution of 10 March 2009 on ensuring food quality, including harmonisation or mutual recognition of standards (2008/2220(INI))

⁶

<http://ec.europa.eu/agriculture/quality/door/list.html;jsessionid=pL0hLqqLXhNmFQyFI1b24mY3t9dJQPflg3xbL2YphGT4k6zdWn34!-370879141?locale=en>

on PDO products at national level and its influence on control system of PDO products. I will analyse which are the factors affecting the performance of official controls and whether there is variation in their performances between different EU countries. This fact may lead to the consideration that diverse implementations of the PDO legislation can be found between EU Member States, that in turn will result in different interpretations of the quality of PDO products.

Food quality = f (Food behaviour, Human behaviour); Food behaviour = f (food dynamics, technical conditions) and Human behaviour = f (human dynamics, administrative conditions)
--

Figure 1.1 Food quality relationship (Luning and Marcelis, 2009)

The focus of this thesis is on the assurance of the quality of PDO products.

As stated by Luning and Marcelis (2009), quality assurance aims at guaranteeing and providing confidence to governments, customers, consumers, and other stakeholders that quality requirements such as product safety, reliability, service etc, will be met. It is especially important in the food sector as the food production put high demands on assuring ultimate product quality. In these circumstances, quality audits contribute to assess the organization and promote a situation of constant control and improvement. Among three different types of audits (Luning and Marcelis, 2009), the third party audit is recognized as the external audit. It assumes that an external organization assesses the company against a quality system standard and it provides a certificate on the basis of the results of the auditing. This document will indicate that the organization complied with the standards on the time of assessments⁷.

In relation to the PDO situation, a third party audit is performed by National Authorities or certification bodies in order to certify PDO quality. Even though these Authorities are recognized by the European Union and the street-level bureaucrats act on the basis of EU regulations, the front-line workers are the actual policy makers, who may have discretion in the execution of their work and thus influence the outcome of the policy implementation. The manner the street level bureaucrats carry out their activities will eventually influence the quality of PDO products.

The following sessions will make clear what is meant by the term of “PDO quality” and how the systems of the official controls are organized to assure it. Only by means of such clarification, it

⁷ Certification is defined as a procedure by which a third party gives a written assurance that a product and/or a service, process or quality management systems conforms to specified requirements (ISO 900:2005).

will be possible to proceed with a deeper analysis on the problem highlighted by the EU Parliament regarding the variation of protection of PDO products between Member States.

1.3.1 PDO quality

PDO products are first of all food products, whose quality is determined by certain characteristics.

a) Intrinsic-extrinsic quality attributes model (Luning and Marcelis, 2009)

The model below shows which are the aspects determining product quality. Quality attributes are the result of diverse product properties, directly or indirectly noticeable, that will contribute the quality perception and experience of the consumers. While the intrinsic attributes are inherent of the physical product (Luning and Marcelis, 2009), the extrinsic attributes do not have a direct link with the product properties, they are related to the production system characteristics and other factors, such as marketing purposes. Both types of quality attributes can influence the consumer's perception on quality.

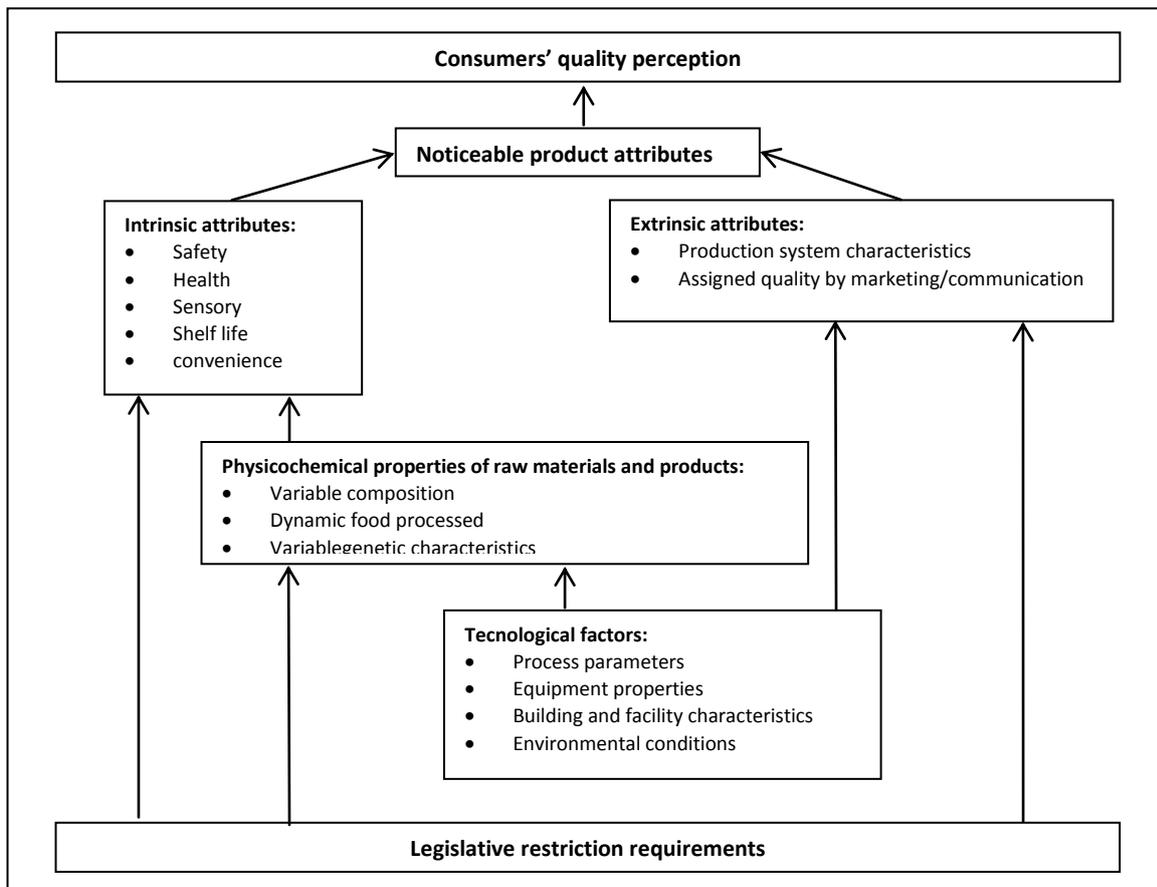


Figure 1.2 Intrinsic-extrinsic quality attributes model (adapted from Luning and Marcelis, 2009)

When considering the topic of this thesis, PDO scheme protects those characteristics which link the properties of the product with its geographical origin and its methods of production, processing and preparation. Therefore, the quality guaranteed by the PDO scheme is mainly part of the extrinsic attributes but it also includes intrinsic characteristics. In any case, PDO recognition will eventually determine the final quality perception.

As can be seen, also legislation affects quality attributes by putting restrictions and requirements not only on product properties, technological conditions and managerial aspects, but also directly on the attributes.

The provisions on PDO products are an example. This thesis will deal with the impact of differences between control systems on the final food quality.

b) Registration of a product name at European level

The procedure for the registration of EU and non-EU products is schematized in the figure below.

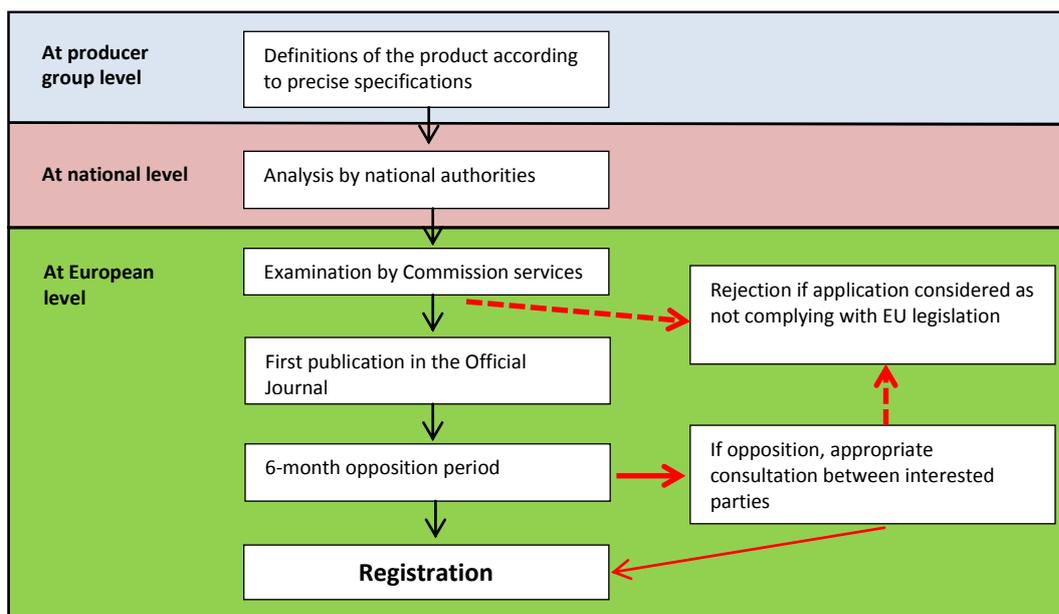


Figure 1.3 Procedures to register a product name (adapted from http://ec.europa.eu/agriculture/quality/schemes/index_en.htm)

Considering the producers in the European Union, the group of producers or processors that applies for the registration must define the product according to precise specifications. This document, which is called Specification, will be analyzed by the national authorities and then sent to the EU Commission. If the application complies with the EU legislation, it will be published in the Official Journal. Any objections can be presented within 6 months by any Member State, third

country, natural or legal person having a legitimate interest. After that period, if not objections are received, the product will be registered.

Therefore, the Specification is a document approved by the European Union in order to identify a product with PDO recognition. Only when the Specification is accepted at European level, it is possible to go further with the arrangement of the activities carried out by authorized bodies for guaranteeing the requirements listed in the Specification. All these inspection activities are set up in a document called Control Plan, which is built up by the Control Body on the basis of the product description presented in the Specification.

c) Reg. (EC) 510/2006: product specifications and official controls

The Reg. (EC) 510/2006 makes rules regarding agricultural products with protected designations of origin.

The EU has established the minimum requirements should be listed in the Specification in order to obtain a PDO mark:

- the name of the PDO;
- the description of the product, with an indication of its main physical, chemical, microbiological and organoleptic properties;
- definition of the geographical area;
- information proving that the product originates from that area;
- information justifying the link between the product and the geographical area;
- description of the production method and, if appropriate, the authentic and unvarying local methods as well as information concerning packaging that takes place in the defined geographical area in order to safeguard quality, ensure the origin or ensure control;
- the name and address of authorities or bodies that verify compliance with the provisions contained in the product specification;
- any specific labelling rule for the product in question;
- any requirements laid down by Community or national provisions.

Moreover, the Reg. (EC) 1898/2006, which contains rules for the application of the Reg. (EC) 510/2006, sets out specific rules applicable to groups, names, raw materials and labelling of the

agricultural products. It also contains a template of the single document to be included in the applications for registration.

There should be no room for misinterpretation concerning the aspects that should be included on the Specification, as the details of the description must be approved by the EU before the product receives the PDO designation.

Instead, divergences may arise in the organization of the control system for assuring food quality. In the matter of official controls, the principle 16 states:

“The designations of origin and geographical indications protected on Community territory should be subject to a monitoring system of official controls, based on a system of checks in line with Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules [3], including a system of checks to ensure compliance with the specification of the agricultural products and foodstuffs concerned.”

This means that requirements set out in this Regulation are carried out under Reg. (EC) 882/2004. Verification of compliance of a product with its product specifications may be ensured by one or more public authorities set up for this purpose or by one or more product certification bodies.

Thus, official controls on PDO products aim at ensuring either food safety requirements, whom all foodstuff have to comply with, or the compliance with the Specification. The latter purpose arises from the nature of the extrinsic attributes: requirements concerning the origin, tradition and method of production must be guaranteed by third parties' inspections because they cannot be perceived by the consumer even after inspection and use (Albersmeier et al. 2009). For this reason, the EU has recognized National Authorities as reference bodies to provide assurance that certain aspects of the product or its production method, as laid down in the Specification, are observed (Art. 10 of Reg. (EC) 510/2006). Though, they may delegate certain control tasks to private organisations, such as certification bodies, and they may proceed to audit or inspect those bodies to whom the tasks have been delegated, as established in the article 5 of Reg. (EC) 882/2004. No more details about how the control system should function are given.

1.3.2 Policy implementation process and different types of alignments

a) Policy implementation: relevant hierarchical levels for systemic evaluation (adapted from Rametsteiner and Weiss, 2005)

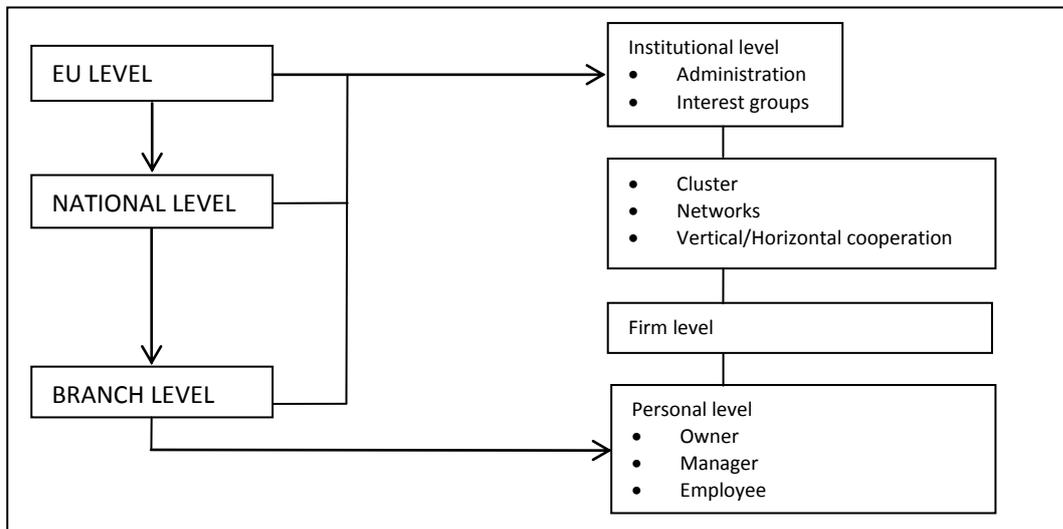


Figure 1.4 Policy implementation: relevant hierarchical levels for systemic evaluation (adapted from Rametsteiner and Weiss, 2005)

Policy implementation is often seen as a hierarchical and linear process, from the institutional to personal level (fig. 1.4). This model is relevant to understand which actors of the different hierarchical levels are involved in policy implementation procedures related to the implementation of control system.

The EU is characterized by a highly decentralized implementation structure. It does not have its own administrative device to implement legislation and thus it has to rely on the Member States to do so. The implementation of EU legislation involves certain institutional changes at the national level. However, it “regularly leaves certain issues to the discretion of the Member States” due to its awareness of specific regional and local circumstances within EU countries (Treib, 2008). The EU performs the first policy translation process, by setting requirements that have to be translated and adopted by the members. It is the national food authority that transforms EU and national legislation into actual control activities. Finally, the companies have to fulfil the provisions.

A secure compliance will be not guaranteed when the provisions established on the top by EU do not correspond with the outcomes at the bottom (Colebatch, 2002).

However, the actual policy implementation process is performed at national and subnational levels, where the actors are in charge of enforcing and applying the rules. The success or the failure of the policy is regularly the result of crucial decisions taken at the implementation stage.

Three types of rules can be enacted by the European Union: decisions, regulations and directives. Decision are usually administrative acts with a limited impact; they are addressed to individual cases or situations or persons whose identity is known. Regulations have general application and thus they are “binding in its entirety and directly applicable in all Member States” (Art. 249 EC Treaty). Directives are “binding, as to the result to be achieved, upon each Member State to which it is addressed, but shall leave to the national authorities the choice of form and methods” (Art. 249 EC Treaty) (Meulen and Velde, 2008). In any case, the policy implementation is not automatic, technical and apolitical (Treib, 2008).

The requirements on PDO products are settled down by the European Union as regulations. As they are directly applicable, they do not need national law to operate inside the Member States. Consequently, the regulations leave no choice in the means for achieving the obligations and all the Member States have to act in accordance with them to assure that their laws are the same everywhere on the territory of the Union (Meulen and Velde, 2008).

However, the transposition of EU policy into national implementation makes the differences between countries. Beside the technological factors (complexity of food and food production process), the translation process in fact is affected by managerial factors such as governmental styles, national policies and governmental decision making behaviour. Although the legislative framework for PDO product is given as regulation and thus there should not be any opportunity of self-interpretation conceived by the EU Member States, the implementation and the control of such dispositions may diverge. Every EU Member Country has its own control organization for food quality, which includes also the control system for PDO products. Differences may be found in the actual control activities performed to check the level of compliance with the provisions. The discretion left to the Member States to organize operational control systems may lead to the lack of the vertical alignment. In fact, each Member State has designated competent authorities - National Authority and/or Certification bodies- responsible of assuring the PDO product quality but there is no EU rule laying down the way they should work and reach their purpose.

b) Difference between vertical and horizontal alignment

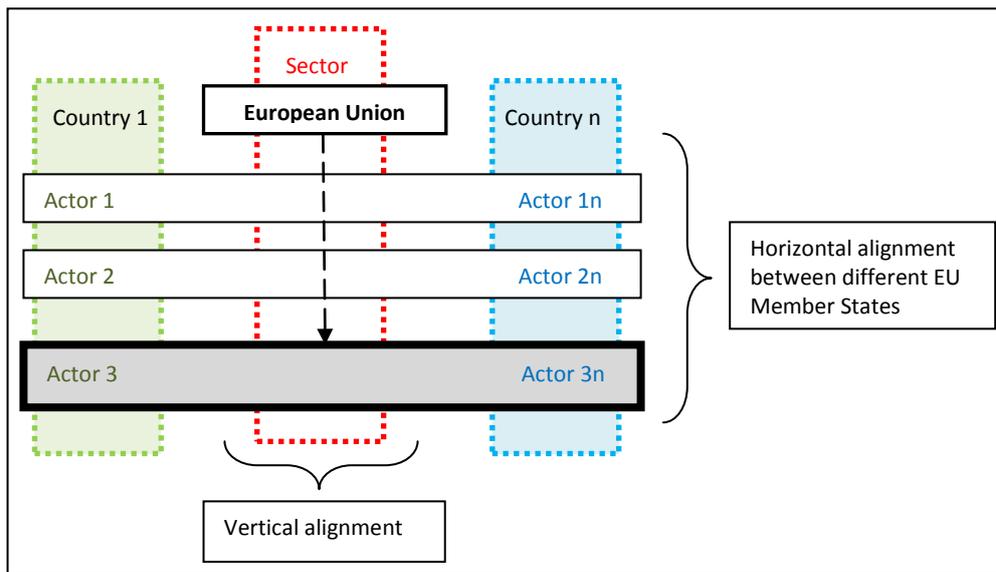


Figure 1.5 Vertical and horizontal alignment (adapted from Schmithüsen, 2004)

The figure 1.5 schematizes the difference between vertical and horizontal alignment.

When dealing with the control system of PDO products (sector), the vertical alignment stands for the extent to which EU regulation is translated by the different actors and finally implemented in practice at company level in alignment with the set requirements. Instead, the horizontal alignment is the degree of uniformity between different actors at the same hierarchical level.

Taking the control system as a “sector”, the figure proposes that the horizontal alignment at the end of the top-bottom implementation process will be achieved when each country translates the policy requirements by having an uniform organization in the operational control system, shown in the performance of the actual enforcers (actor 3), namely also street-level bureaucrats (hereafter SLB).

As suggested by the EU Parliament, the field of PDO products lacks of legislative and procedural harmonisation between different EU members; it is not clearly specified how the control system should work, and thus there is room for national and sub-national interpretation for its implementation. This results in different performances of the front-line workers, that is the guarantee of characteristics established in the Specification.

In fact, sub-national authorities have a secondary role in the implementation of EU regulatory policies but they have been becoming more and more important (Borghetto et al., 2010). This involvement has advantages and disadvantages. On the one hand, by consulting the street-level-

implementers, the EU legislators can have a more realistic view of what is really happening and thus to improve the policy design by understanding what is necessary and feasible (Tommel, 1998). However, their participation increases the number of conflicting interests, and if an agreement is achieved, it often results in a legal unclarity (Borghetto et al. 2010). Therefore, different operational control systems may result in diverse interpretations of the meaning of the quality for PDO products with a negative repercussion on the harmonized recognition of quality attributes of different PDO products among Member States.

1.4 Problem definition

The list of product characteristics required by the European Union in the Specification is equal for all the products with EU recognition. However, each PDO product has its own complexities in term of product features and production process and thus specifications may contain complete but not fully exhaustive product descriptions. As a consequence, the activities set up in the Control Plan will reflect the impreciseness of the guideline document. This fact could thus affect the inspection carried out by the Authorities in charge of assuring product quality. Moreover, each country has its own control system for guaranteeing food quality and the governmental decision making behaviour may lead to different implementation and control of the EU disposition in spite of the unique EU legislation on PDO products. All these aspects would be eventually seen in the outcome of the actual control activities performed by the front-line workers of the National Authority and/or authorized Certification body.

Therefore, technological factors, such as the food complexity in term of product features and production process, and the type of activities set up in the Control Plan, as well as managerial conditions, i.e. arrangement of national control system for guaranteeing food quality, may affect the street-level bureaucrats' performances, and this influence may create variations in the interpretation of the EU legislation regarding PDO products. As a result, dissimilarities between the qualities of the products identified with EU recognition and produced in different EU Member States could be found, nevertheless the PDO legislation is the same everywhere in European Union.

Dissimilarities linked to the product complexities in term of product features and production process will be not discussed in this thesis, as the Specification is a document approved by the European Union at the beginning of the process for identifying a product with PDO recognition. If

the Specification is not accepted at European level, it is not possible to go further with the development of any Control Plan. Therefore, the Specification is considered a matter of fact, while it is necessary the contemplation of the activities set up in the Control Plan in order to understand at what extent the characteristics listed in the Specification are actually covered and controlled.

1.5 Hypothesis

If dissimilarities exist in:

- 1) national interpretations of the EU disposition regarding PDO products,
- 2) inspection activities set up in the Control Plans and
- 3) implementation of control systems at street-level bureaucrats'* level among different EU Member States,

then there will be variation in the performances[°] of the front-line workers* between different Countries, expressed in a state of non-uniformity of quality between PDO products.

* The term of “street level bureaucrats”, as well as “front-line workers”, refers to the people who actually implement policies (Lipsky, 2010).

° The performance is considered in terms of guarantee of PDO characteristics established in the Specification.

1.6 Research objective

Based on the problem definition, theoretical analysis and description of the project focus, this research objective comes out:

To understand the factors influencing the implementation of the control system at street-level bureaucrats*' level of the EU legislation on PDO products, and whether dissimilarities between performances[°] of the front-line workers* between different Countries lead to variations in the quality between PDO products of different EU Member States.

* The term of “street level bureaucrats”, as well as “front-line workers”, refers to the people who actually implement policies (Lipsky, 2010).

° The performance is considered in terms of guarantee of PDO characteristics established in the Specification.

1.7 Research questions

What are the factors influencing the implementation of the control systems at street-level bureaucrats' level of the EU legislation on PDO products, and does variation in street level bureaucrats' performances lead to differences in the product quality?

The following sub-research questions will facilitate me in answering the main research question.

1. How is the quality of PDO products defined by the European Union?
2. What are the characteristics of the control systems in the matter of PDO products?
3. Which specific technological and managerial conditions and factors influence operational control systems at street-level bureaucrats' level?
4. How these conditions and factors influence the performance of the street level bureaucrats?

1.8 Research approach and planning

In order to develop this research, a theoretical analysis based on techno-managerial approach will be conducted to provide a better insight into the factors affecting operational control systems and which influence they may have on the food quality. Supported by literature research, a conceptual research model can then be drawn. Based upon the theoretical findings, a questionnaire will be developed and interviews will be addressed to the actors involved in the control system of the cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and United Kingdom. These products belong to different countries and thus dissimilarities in the implementation of the control systems at street level bureaucrats' level may be found. Interviews will test the research model. Beside the theory analysis, the collected data will be used to identify the bottlenecks and thus to propose solutions. Finally, conclusions will be drawn.

2 Theory analysis

2.1 Quality concept in PDO product

Quality is a very complex and multi dimension concept. Different factors contribute to the quality performance of the product and to the organisation producing it (Luning et al., 2009). From a consumer's perspective, the quality perception may vary according factors such as the moment at which the consumer makes the purchase or consumes a product, and the place where it is bought or enjoyed (Fandos et al., 2006). This means that the consumers will evaluate the quality when he receives information or cues about the product's characteristics when they buy it or consume it, judging also its utility based on his needs. Therefore, search, experience and credence attributes can be distinguished on the basis of when and how the consumers receive quality information. "Search" attributes is the "quality in the shop" (Fandos et al., 2006), for which the product attributes are important for the product selection. The "experience" quality is available only when the consumers use or eat the product and thus it is important for the perception of organoleptic quality. Finally the "credence" stands for the attributes concerned to the consumers but they cannot be estimated by the consumers when buying or consuming the product and therefore the buyers must rely on information or communication about these non-observable attributes.

Another categorization regarding quality from a consumer's viewpoint is provided by Steenkamp (1997), who distinguishes intrinsic and extrinsic attributes. While the first are sensory-observable characteristics, and consequently they can be measured objectively, the latter are related to the product but they are not directly part of it, like the name or image. Similar classification but using the terms of central and peripheral attributes, was made by Sanzo (2001, in Fandos et al., 2006).

As can be seen, any product characteristic is considered by the consumers in order to determine quality. When thinking about PDO legislation, it seems that both intrinsic as well as extrinsic attributes are taken into account. However, the designation of origin as a whole is a non-material product characteristic, it can be foreseen by the consumers only through an appropriate labelling and therefore it is classified as a credence attribute (Erickson et al., 1984; Northen, 2000; Oude Ophuis and Van Trijp, 1995 in Sepulveda et al., 2009). For example, there is no way for the consumer to directly check whether the preparation of the product took place in the geographical area defined in the Specification. He has to rely on the EU logo "PDO" on the label of the foodstuff.

The European Union has established the PDO certification scheme not only in order to support diverse agricultural productions, protect product names from misuse and imitation, but also to make clear the link of products with certain characteristics with their production region or origin and thus to help consumers by giving them information concerning the specific quality of the products.

As stated by Fendos et al. (2006), “traditional food products can achieve competitive advantages using quality, product differentiation and branding policy as marketing strategies”.

The Reg. (EC) 510/2006 defines "designation of origin" as *“the name of a region, a specific place or, in exceptional cases, a country, used to describe an agricultural product or a foodstuff:*

- *originating in that region, specific place or country,*
- *the quality or characteristics of which are essentially or exclusively due to a particular geographical environment with its inherent natural and human factors, and*
- *the production, processing and preparation of which take place in the defined geographical area”.*

Therefore, producers can improve the quality of certain products linked with natural and human factors by using PDO as a EU brand-recognition.

The complexity of the quality in PDO products is explained also by Ilbery et al. (2000). From a marketing prospective, four indicators of quality can be related to inter-linked criteria: certification, specification, association and attraction (Fig. 2.1). The authors transfer their conceptualisation of quality into the PDO context.

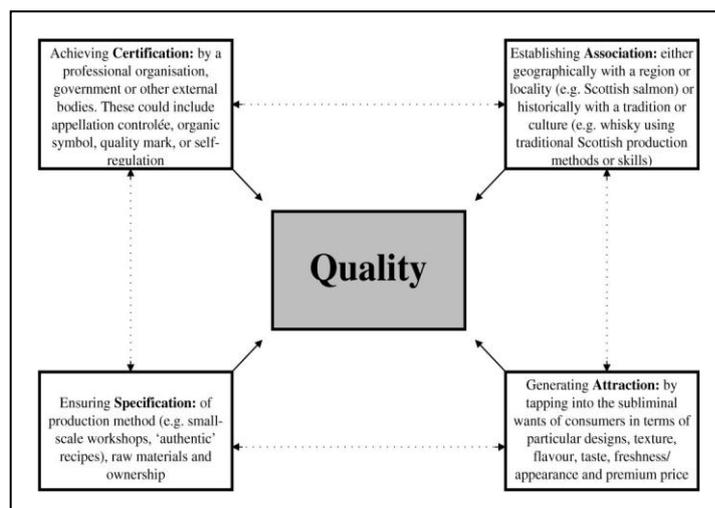


Figure 2.1 Conceptualising quality (adapted from Ilbery et al., 2000)

The awarding of a PDO symbol of certification depends on the use of specific production methods and raw materials (Specification) from a particular geographical area (association). Moreover, the quality can be produced through attraction by tapping into the subliminal wants of the consumers in terms of design, texture, flavour, taste, appearance and premium prices (Ilbery et al, 2000).

Therefore, all the four aspects influence each other and contribute to the final product quality. Both intrinsic (design, texture, flavour, taste, freshness/appearance) as well as extrinsic (association) attributes are considered.

In this context, it can be seen that the Certification Body plays a crucial role: it has to verify the compliance with the provisions of the Specification, which can list both intrinsic and extrinsic product attributes, and thus they may need to guarantee both sensory-observable characteristics and other aspects of the products that are part of it but they cannot be directly judged by the consumers, such as the association of the product characteristics with the place where it is produced.

2.2 Certification systems

“Certification is the (voluntary) assessment and approval by an (accredited) party on a (accredited) standard” (Meuweissen et al., 2003). The main feature of the control system is that the inspections are performed by independent bodies (third-party certification), which assess, evaluate and certify safety and quality claims against a set of standards and compliance procedures (Hatanaka et al., 2008).

By introducing the certification systems, the information asymmetry and quality uncertainty can be reduced significantly (Matthias et al., 2004) and the consumers can have a proof that the products they buy are safe and are in line with particular quality standards.

Even though different certifications systems exist, they can be grouped in two categories: private and public initiatives. Private certification systems are typical of the European food industry and they differ considerably in case their certifications serve as a tool for consumer marketing purposes or they are addressed to institutional buyers (Albersmeier et al., 2009). For instance, ISO 9000, business to business marketing tool, or GLOBALGAP or BRC and so on are all private certifications. The governmental certification systems aim at protecting the consumers and thus they provide quality labels to improve market transparency. Any fraud is prevented by public

standards, that are enforced by official authorities through fines (Albersmeier et al., 2009). Examples of state-run initiatives are organic farming and PDO labelling. Nevertheless, all the systems have basically the same structure (fig. 2.2).

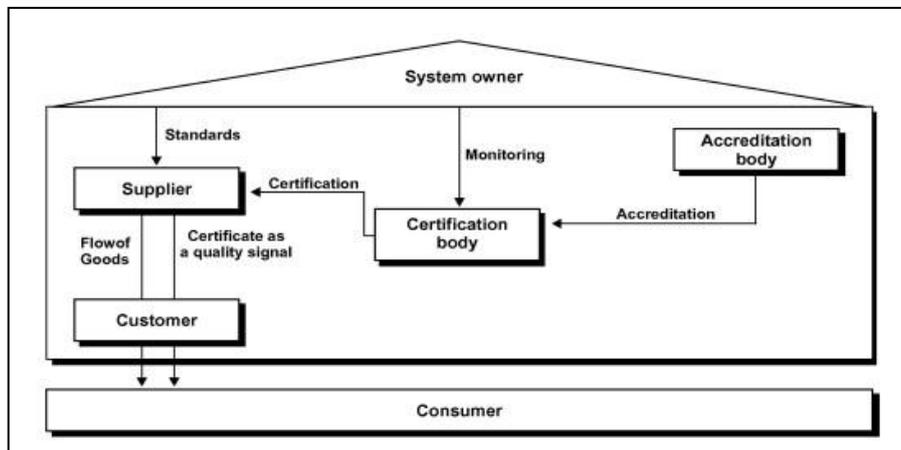


Figure 2.2 Basic structure of certification (adapted from Albersmeier et al., 2009)

The central point to look at is the “flow of goods” between suppliers and customer/consumer. The supplier provides a certificate that is seen as a quality signal issued by a third party body based upon certification standards laid down by the scheme owner. The certifiers, in turn, have to prove their ability to perform inspections according to defined rules through an accreditation, given on the basis of the ISO 65/EN 45011 standards, which contains general requirements for assessment and accreditation of certification bodies.

The importance of the quality signals for the consumers is stressed by Barzel (1982, in Raynaud et al., 2005), who affirms that they allow a reduction of search and measurements costs. Not only price or amount of advertising are used as quality signals, but also the label that gives a name or identity to the product (Raynaud et al., 2005). The PDO system, that links the quality of the product with its geographical origin and specific production process, utilizes the PDO label as a signal of product quality assured by a public third party. In fact, as stated by Tirole (1988, in Anania and Nisticò, 2004), a third party certification - “by supplying consumers with the guarantee that the product they buy actually does conform to the quality description given by producers - provides consumers with a substitute for the information and trust they lack”.

Operational certification/control systems for PDO products

The art. 10 and art. 11 of the Reg. (EC) 510/2006 deal with the official controls. First of all, the European Union has established that the requirements set out in abovementioned regulation are carried out under Regulation (EC) No 882/2004, where the definitions of official controls, competent authority and control body are given in the art. 2.

- "official control" means any form of control that the competent authority or the Community performs for the verification of compliance with feed and food law, animal health and animal welfare rules;
- "competent authority" means the central authority of a Member State competent for the organisation of official controls or any other authority to which that competence has been conferred;
- "control body" means an independent third party to which the competent authority has delegated certain control tasks.

Thus, the European Union has recognized National Authorities as reference competent bodies responsible for the enforcement of the legislation: they have to provide assurance that "any operator complying with this Regulation is entitled to be covered by a system of official controls" and certain aspects of the product or its production method, as laid down in a specification, have been observed. The verification⁸ of the conformity with the specification guidelines may be ensured by one or more authorities but also it can be delegated to control bodies, whose name and address are made public by the Commission. The aforesaid authorities and/or control bodies operating as product certification body shall be accredited in accordance with European standard EN 45011 or ISO/IEC Guide 65 (General requirements for bodies operating product certification systems). The control authorities/bodies should assure objectivity and impartiality and they should adequately perform their tasks thanks to qualified staff and disposal of resources.

The procedures for verifying the compliance with the Specification will be based upon the Control Plan⁹, which is drafted by the certification body on the basis of the product specifications. Before the product is protected with the PDO label, this document has to be submitted to and approved

⁸ Article 2 of the Regulation (EC) 882/2004: "verification" means checking, by examination and the consideration of objective evidence, whether specified requirements have been fulfilled

⁹Article 2 of the Regulation (EC) 882/2004 "control plan" means a description established by the competent authority containing general information on the structure and organisation of its official control systems.

by the Competent National Authority. When the quality production standard is in line with the provisions at every stage of production and processing, the certification body approve the PDO labelling on the product and it will carry out regular controls.

These verifications will result essential for a PDO product, since it has been found that the amount of monitoring by third parties and high disclosure rate will enhance the likelihood of identifying non-conformity with the provisions and the credence attributes could be theoretically be treated as experience goods (Albersmeier, 2009). With this governmental certification system, the product can be visually recognized at the market level and the consumer can make an informed choice. Any mislabelling will be paid through fines enforced by official authorities (Albersmeier et al., 2009).

2.3 Role of official certifiers

In the context of the PDO certification scheme, the certifiers embody a crucial role: since it is impossible to detect all the characteristics of PDO products after the production process (i.e. whether the production process took actually place in the geographical area defined in the Specification), the certification bodies will act as third party, recognized by the National Authority, with the right to directly monitor the whole supply chain and ensure onsite inspections. They will be a signalling institution for certifying the PDO concept and thus for assuring product quality. However, the actual control activities at the company level are eventually carried out by the street level bureaucrats, who are the enforcers in direct contact with the regulated firms. Even though they are the last ring of the decision making process, they still have room for discretion when implementing the legislation through routine practices and their activities result important for the enforcement process “for they act as its gatekeepers” (Black, 2001). Therefore, the investigation of the factors influencing the decisions of the front-line certifiers can help to understand the reasons of particular policy implementation and its accountability in policy delivery. The policy outcomes will be better comprehended.

2.4 Factors influencing implementation of the control system “at the shop-floor level”

As said before, the European Union leaves room to the Member States for the policy execution. This means that it trusts on the EU countries' choices by leaving them the freedom to decide between different courses of action (Black, 2001). Davis (1969, in Black, 2001) argued that the discretion can be “structured” and “confined” through rules, and be “checked” through mechanisms of accountability. Therefore, the more rules there are and the more precise they are, the more the freedom to choose between different courses of action will be reduced (Black, 2001). However, “discretion is a central part and inevitable part of the legal order” (Hawkins, 1992) due to the fact that any implementation of the rules involves interpretation and choice and thus every person at every level involved in the regulatory and legal process will exercise discretion.

A regulation is the product of the interaction between regulators, regulates and other actors involved in the regulatory process (Black, 2001) and therefore the understanding how the actual control activities are carried out by the official controllers at the shop-level will lead to grasp how any regulatory control system works.

2.4.1 Context of regulation

The context of the regulation affects the implementation of the control system “at the shop-level” (Black, 2001). Control agencies are operating in a context where political demands, media attention, economic conditions, social concern and moral legitimacy may create different kind of pressure. These forces can be experienced at all levels of the agency and they can influence the enforcement priorities, inspection procedures and sanctioning activities (Black, 2001).

The circumstances of implementation may vary not only between different countries and different political systems but also with the characteristics of the target population (Peters, 2007). Politics and policy design will determine the disposal of resources, the authority that the implementing agencies have at their disposal, the complexity of the inter-organisational network that must cooperate to achieve the objectives, the density and the coherence of the policy framework and the capacity of the organisational delivery system (Peters, 2007).

Thus, the policy implementation will result from the interactions between the street-level bureaucrats with their organisations, with the network in which they work and with the target group with whom they work.

In fact, the EU is trying to improve the legislation regarding products with added value to permit a more uniform approach in policy implementation among the EU Member States. However, it is also aware about the fact that there are particular political, social and also technological circumstances which characterize each local product and the certification bodies have to handle with them. Looking at the organisational chart of the certification companies, the extent to which decision-making authority is delegated to the front-line workers has to be considered. In fact, the street level bureaucrats are actually the policy makers rather than implementers (Lipsky, 2010) and they have to cope with these particular conditions in their daily practices. Therefore, they may have room for individual decision-making in order to reach the goals established with the EU policy.

In addition to this, the PDO label is a complex concept, where all the product properties-both intrinsic and extrinsic- are taken into account. Methods and technology exist to guarantee all the features implied in the PDO idea, but they may be still not enough appropriate for assuring a realistic outcome.

Interaction between enforcer and regulatee

The policy implementation will result from the interactions between the street-level bureaucrats with the target group with whom they work. The target group may be part of particular socio-political circumstances, whom the inspectors have to deal with (Peters, 2007). Thus, the relation between the controller and the regulated firm is the first aspect considered in analysing the factors which may have an influence in the street-level bureaucrats' behaviours and thus in their performances.

As Black states (2001), "the regulation in practise is the product of the day to day interaction of regulators and regulatees". This means that what the enforcer thinks about the firm, and thus the kind of relationship controller/regulatee, will affect the discretion used by the street-level bureaucrat and in turn his performance. The enforcement officers' perception of the characteristics of the regulatee will be essentially based on the level of motivation and commitment showed by the regulated firm to comply with the legislation. However, these assessments are subjective and they take into account time, money and energy applied to achieve regulatory goals; the attitude of the manager and employees toward compliance; the company's financial position and technological knowledge, treatment of workforce, staff turnover and the

nature of any incentive structure. Moreover, the enforcer will consider the “enforcement career” of the firm, its past record of compliance, its honesty and so on. Finally, the characterisation can also be built up through the controller’s own personal interaction with the firm over a period of time, which is defined as “relational distance” (Black, 2001). It refers to the nature of the relationship between enforcer and regulated firm or individuals within it in terms of scope, frequency and duration of interactions between people, the age of their relationship and the nature and number of links between them in a social network (Black, 2001). This leads to the consideration that the amount of law used will be proportionate to the relational distance: the more the distance, the more law will be used in the case of disputes. For example, large firm requires more inspections, and thus the frequency of the contacts controller/regulated firm will be higher. As a result, the relational distance is lower and there may be smaller use of formal sanctions.

2.4.2 Legal framework

Clarity of the rules

The implementation of the EU legislation inevitably imparts discretion to all the actors involved in the policy translating process -states, local authorities and street level bureaucrats- and major difficulties arise when the “political logic of policymaking confronts the administrative logic of implementation” (Brodkin, 2000). In fact, it has been shown that “ambiguous, complex and discretionary policies are unlikely vehicles for producing consistency, certainty and transparency in policy implementation” (Brodkin, 2000).

This means that also the density and the coherence of the policy framework must be considered as a factor shaping the policy implementation. The way the policy makers put in writing the rules has an influence on the policy interpretation. When the rules are simple and set clear objectives, there is less room for discretion and thus less responsibility for policy execution to the Member States. In case of PDO, the activities established in the Control Plans are decided by the certification body on the basis of the conditions pointed out in the Reg. (EC) 510/2006 and related legislation. Thus, the clarity refers to the preciseness of the goals, that should be few in number and non-contradictory, and to the language utilized.

“The use of general rules which are vague as to manner, place, or time, and/or which impose evaluative standards (‘reasonable’, ‘best practicable’, ‘suitable’) implicitly confers discretion to

those applying the rule (not just enforcement officials) to make a judgement as to its application in any individual circumstance” (Black, 2001). Thus, the use of clear and precise rules may leave less room for interpretation of what is allowed or forbidden. However, too detailed rule can increase the discretion instead of reducing it simply because there are too many rules to examine.

2.4.3 Characteristics of the control activities set up in the Control Plan

When dealing with PDO products, the approval of the Specification means that the National Authority first and the European Union then recognize and agree upon the description of all the requirements listed in the document, as established in the EU regulation. Thus, they approve the definition of the product with the indication of its main characteristics; the definition of the geographical area; the information proving that the product originates from that area; the information justifying the link between the product and the geographical area; the description of the production method and packaging.

Once all these features are accepted, the certification body constructs a Control Plan on the basis of the product characteristics which will be protected with the EU recognition. This document includes all the inspecting activities to which the product is subjected so that it can be distinguished with the PDO logo.

Thus, the controls regard the assurance of the compliance of those elements which characterise the product. Firstly, the delimitation of the geographical area of production of raw material, of transformation and of any further stage, where all the actors involved in the disciplined chain must be located. Secondly, the description of the product with the identification of the raw material, ingredients and final physical and chemical properties. Thirdly, the method to obtain the product, systems of identification and traceability of the product and its components. Finally, any method of presentation of the product when it enters into the market.

The whole set of controls is built up both by the activities directly charged to the actors involved in the regulated chain (self-monitoring plans), and by controls of conformity performed by the certification body in order to verify the conformity of the processes and of the product. The self-monitoring activities will allow the generation of related registrations, which will be examined and valued by the street level bureaucrats during their inspections.

Therefore, the Control Plan aims at identifying, through activities of evaluation, inspection and verification, the compliance of provisions established for that particular product. However, the extent to which the activities actually cover all the product characteristics listed in the

Specification has to be taken into account for a possible effect on the performance of the street level bureaucrats. If the activities do not consider all the product specifications, then the assurance of the PDO quality is not satisfied.

2.4.4 Organizational factors

The policy implementation will be also the outcome of the interaction between the street-level bureaucrats with their organisations. The disposal of the resources, the organisational practices affecting the relationship between inspectors and regulated firms, the presence of the reward system and of internal leadership will all contribute to the final aim of assuring quality in PDO products. Each of these items are explained in detail below.

Availability of resources

The term “resources” includes different items: it does not stand only for money, time and staff, but it refers also to “the storehouse of knowledge and practical advice implementers might turn to for assistance” (Hill, 2003). Street level bureaucrats may lack of knowledge, and/or practise and/or information. Therefore, implementation resources may offer to implementers opportunities to learn theories and skills needed to implement policy well through trade literature, conferences, workshops training or on-site consulting, but also simply providing space to gather with colleagues and reflect on practice (Hill, 2003). In fact, the fairness of a company in providing support to the workers can be seen in the formal and informal ways the resources are distributed among employees, such as adequate information and voice when implementing decisions, ways of promoting and treating employees with dignity. However, agencies may allocate their resources in the way which they consider will be the best to achieve their ends (Rowan-Robinson in Black, 2001) and this fact can have an effect on the implementation of the control system at the shop level and in turn in its performance.

Organizational practices regarding relational distance

Organizational practices may play a role in the type of relational distance between enforcers and regulated firms. The agency may prevent controllers from establishing long term relationship with the regulatees by adopting the strategy of frequent rotation of the personnel to different geographical areas or to different companies. Moreover, internal rules could require that all the

reports by the field enforcers have to be scrutinised by other officers or specialists-technical experts, economists etc-, and thus the autonomy of the individual controllers could be minimized and also the relational distance increased (Black, 2001).

In fact, it is shown (Black, 2001) that the nature and the duration of the interaction between regulator and regulatee will influence the inspectors' manners in assessing the conducts of the companies and in turn their performances in assuring quality for PDO products: if any breach is detected, the gravity of the failure will be perceived accordingly to the nature of this interrelation. Moreover, the severity of the corrective actions applied by the official controller will be proportionate to the personal interaction with the firm over the time (Black, 2001).

Therefore, any possible organizational strategy, which is aimed at avoiding long term relationship between regulator and regulatees, has to be considered and investigated as a variable which will influence the street level bureaucrats in successfully accomplishing their tasks.

Internal performance measures

Internal performance measures refer to the rewards in money or promotions that the officer will receive on the basis of his work. The controllers' behaviour may be the result of the rewards given accordingly to the number of formal actions taken, such as samples taken and warnings given, as the officer will focus on that actions that will receive the approval from the managers (Black, 2001).

The presence of the reward system within the company will shape the behaviour of the employees, regardless the type of the organization -certification organization or something else-. Especially for the street level bureaucrats, who act as EU-policy enforcers, the motivation provided in term of money or promotions for implementing the rules will lead to good performances in their work (Black, 2001) and thus in satisfying the conformity with the established requirements. This is the result of the fact that when they receive any kind of reward, they will concretely see the appraisal of their behaviour. In other words, even though they possibly do not care about the value of their work, it is expected they are stimulated to accomplish their tasks by thinking about their own interests and the advantages they can gain from their good behaviours.

Therefore, the presence of organizational rewards will also have an effect on the performance of the street-level bureaucrats in their routine practices.

Internal leadership

Internal leadership can have a strong influence on the definition of the organizational culture. However, there might be tensions and variations within the agency itself on the meaning of what good enforcers should do. As Hutter and Manning (1990) state: "The pattern of enforcement is, at least in part, a result of the dialectic between management, with their concern for overall performance, compliance and the organisational mandate, middle management whose aim is to control the inspectors and their practices, and the inspectors who are inclined to see their tasks as exercising an immediate face-to-face responsibility and resolving culpability on their particular "patch" or "turf". Thus, the controllers "at the shop level" could aim at maintaining long term relationship with the regulated firms through cooperation and bargaining, middle managers may be more aware about the evidence that the officers are active by means of written records, monitoring time spent on the inspections. Finally, the top manager may be concerned on providing proofs and assurance of the agency's effectiveness. From the street level bureaucrats' perspective, supervisors represent the organization and their actions contribute to shape employees' opinion of the organization. Therefore, the degree to which supervisors are able to positively influence the employees in accomplishing their tasks and value employees' contributions will have an effect on the front-line workers' performance.

2.4.5 Personal background

Yanow (1996) argued that the meaning of policy is created in context, not only from the actual words of legislation but also from the knowledge and the values implementers bring to their jobs (Hill, 2003). Therefore, also the personal background has an influence on the decisions taken by street level bureaucrats regarding their inspection activities. It refers to the individual knowledge, experiences and social norms, whom every controller will consciously or unconsciously use when performing his tasks. As Richardson et al. (1983) summarise: "The officers' behaviour was restricted by professional expectations, bureaucratic demands and personal moral norms. An action in disregard of any of these would be considered "illegitimate" in some sense: a breach of professional expectations would be unprofessional; of bureaucratic demands, irregular; and of moral norms, immoral" (Richardson et al., 1983: 190).

3 Research model and indicators

3.1 Research model

The European Union is characterized by an highly decentralized implementation structure. It does not have its own administrative device to put into operation the legislation and thus it has to rely on the Member States to do so. In fact, the European Union starts the policy implementation process by setting requirements, which have to be then translated into execution by national and sub national actors. The outcome of this process will be seen in the performances of the final stakeholders, as they are the end ring of the decision making process. When the policy implementation process regards the control activities for the assurance of quality in PDO products, the European Union sets rules in form of regulation, recognized National Authorities responsible for the surveillance of the compliance with the provisions of the specification and in charge of coordinating control activities, which are delegated to certification bodies. However, the regulation leaves certain issues to the discretion of the Member States in order to cope with the local realities. For this reason, when different actors put into practices the European rules, there may be diverse interpretation of the PDO legislation and the policy execution for the controls assuring product characteristics may vary between different countries.

The street level bureaucrats are the actual enforcers of the control activities, and thus the outcome of the implementation of the control systems at the front-line workers' level can be seen in their performances. Thus, the analysis of the factors affecting the implementation of the control system at the shop level will be essential to understand which are the causes of dissimilarities in the performances of the street level bureaucrats, as they have to deal with all the decisions taken by their superiors in the policy translating process and they have still room for their own discretion.

Moreover, variation in the performance of the front-line workers in different EU countries results in differences between interpretations of the quality of PDO products.

The previous literature analysis permitted the identification of the factors having a direct influence on the implementation of control system at the street-level bureaucrats' level and thus on its performance. In turn, the quality the PDO product will be eventually effected.

The issues can be clustered into four groups: a) legal framework; b) organizational factors; c) personal background; d) quality of the Control Plan. The legal framework refers to the consistency of the rules to be implemented. In the particular case of the street-level bureaucrats, they have to cope with the documents and guidelines translating the EU rules. When they perceive a lack of clarity in the rules, due to the fact that they appear complex and do not set clear objectives, there will be room for their own discretions when carrying out inspection activities. The organizational factors refer to the supervisors' leadership behaviour and organizational support. It has been shown that the organizational culture influences the front-line workers' performances. Therefore, in order to analyse how the organization affects the outcome of official controls, it is necessary to consider also the degree to which supervisors are able to positively influence the employees in accomplishing their tasks and to value employees' contributions, the disposal of resources and the human resources practices, such as the use of internal performance measures and organizational practices aimed at influencing the relation regulator/regulated firm. Moreover, the personal background will also have an influence on the street-level bureaucrats' actions, as their personal knowledge, experience and moral norms can generate know-how differences between the individual inspectors. Finally, the Control Plan aims at identifying the compliance of provisions established for that particular product and thus the activities which are set up will be of foremost importance.

As a whole, these factors have to be thought within the context of the PDO legislation. In fact, the regulation about PDO products was born due to diverse necessities: a) promoting products with an added-value because of their particular raw materials and ways of production linked to the geographical and historical framework; b) avoiding imitation and c) encouraging rural economies. Therefore, social and economic-political aspects have to be taken into account when considering these special foodstuffs, which are characterized by uniqueness and thus differ from each other. The legislators have to consider the heterogeneity of the interests among the actors involved in the EU decision making and the high consensus of requirements, as "any regulation determines a redistribution of welfare, and its definition is the result of the resolution of a conflict among contrasting interests"(Anania et al., 2004).

Based upon these considerations, a conceptual research model is developed, as illustrated in the figure 3.1. Researchable indicators are specified below each factor influencing the implementation

of the control system at street-level bureaucrats' level and below the outcome "SLBs' performance".

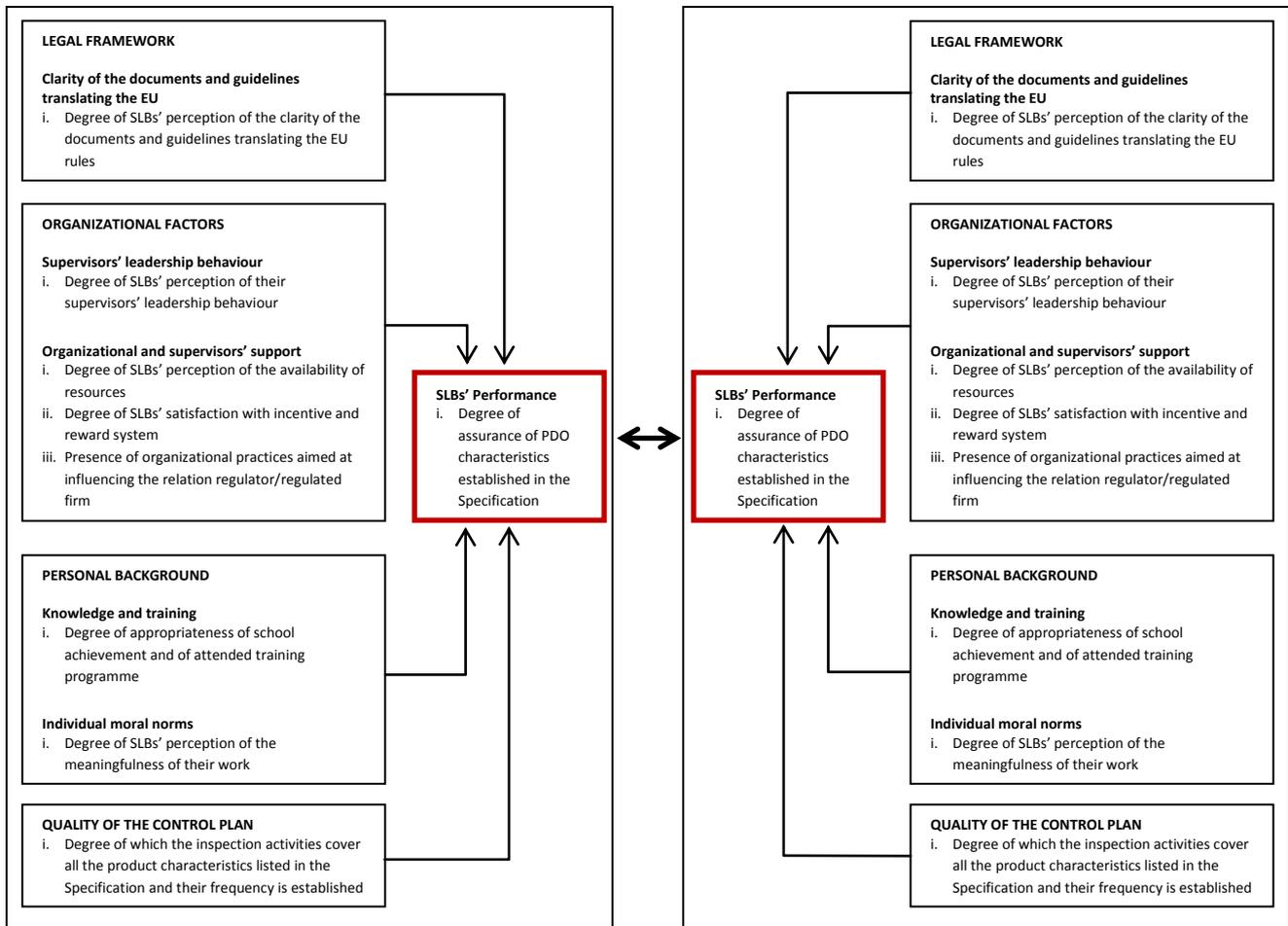


Figure 3.1 Conceptual research model. "SLB" stands for street-level bureaucrats; "PDO" stands for Protected Designation of Origin.

This model has to be followed in two steps: firstly each big square has to be considered. They deal with the implementation of the control system at the street level bureaucrats' level and their performances in each country. Secondly, the left-right arrow summarizes the comparison between different outcomes, that will be needed for understanding the impact of differences between control systems on the interpretation of quality of PDO products.

Considering the implementation process within each Member State, the outcome is the performance of the street level bureaucrats, which have to assure the product characteristics listed in the Specification. The successful performance of the controllers at the floor level is the result of their decisions, which are dependent on both technological and managerial factors,

classified as legal framework, organizational factors, personal background and quality of the Control Plan.

In order to accomplish their tasks, they have to follow the documents and guidelines translating the EU rules. This means that they have to carry out the control activities settled on the Control Plan. Therefore, the degree of clarity of the rules to be implemented will influence the performances of the front-line workers, as they are the end of the chain of the decision making process, which starts at the European level and goes along the national and sub-national actors, to finally reach the agencies, whom the enforcers work for. The policy translating process may vary depending on the interpretation of the original rules and this discretion will be seen in the outcome of the policy implementation.

Moreover, street level bureaucrats' performances will be influenced by the organizational factors, namely supervisors' leadership behaviour and support. While the first refers to ability of the supervisors in promoting consistency in the interpretation of the rules, the latter regards the disposal of resources and the human resources practices, such as the use of internal performance measures and organizational practices aimed at influencing the relation regulator/regulated firm. Also, the personal background, related to individual knowledge, experiences and moral norms, will also have an effect on the controllers' decision making and on their performances as a consequence.

Finally, the quality of the Control Plan will determine the outcome of assured PDO product characteristics, in case the inspection activities set up in the Control Plan cover all the product features listed in the Specification.

Therefore, the front-line enforcers' decisions vary depending on diverse factors and they will result in the street level bureaucrats' performances. The different outcomes will in turn influence the horizontal alignment between different countries in the interpretation of the quality for the PDO products and the comparison of the street level bureaucrats' performances can be used to understand at what extent this variation occurs.

3.2 Indicators

Based on the conceptual model and the technological and managerial models presented in the theory analysis, researchable indicators can be selected. The indicators should be relevant and precise: if examined, they should lead into valid conclusions on the reasons explaining

dissimilarities in SLBs' performances between different countries and therefore variations in the interpretation of the quality of PDO products.

The factors influencing implementation of control systems at SLBs' level will be showed in the following paragraphs, as well as their performances within each Member State.

3.2.1 Legal framework

The street level bureaucrats are the final implementers of the policy decision making process, which starts at the European level and goes along the all the actors involved in the implementation process. Although the provisions specified by the European Union are in form of regulations and thus they should be directly applicable in the EU Member States, they may leave room for different interpretations to the actors who have to implement them. Thus, the clarity of the documents and guidelines translating the EU rules have to evaluated as an influencing factor for the implementation of control system at SLBs' level, as the European provisions will at least be translated by the superiors of the street level bureaucrats within the company before reaching the actual enforcers.

- **Clarity of the documents and guidelines translating the EU rules**

- *Degree of street level bureaucrats' perception of the clarity of the documents and guidelines translating the EU rules*

The degree of clarity of the documents and guidelines translating the EU rules will be evaluated by considering the front-line workers' perceptions. This is due to the fact that the street level bureaucrats are the actual implementers of the EU legislation and therefore the rules will result clear when they recognize that the goals and procedures are simple and well defined, and the language is precise. If the policy is clear, it is unambiguous and non-contradictory and thus it should minimize the possibility of different interpretations.

It can be assumed that there will be: an high level of clarity when the street level bureaucrats observe that the goals are well defined and non-contradictory and the language is precise; a medium level when the clear definition or the non-contradiction of the goals or yet the

preciseness of the language is missing; a low level when the rules are perceived to lack of those characteristics.

Table 3.1 Operational indicator for the perceived degree of the clarity of the documents and guidelines translating EU rules

Operational indicator	Level of clarity		
	Low	Medium	High
<i>Perceived degree of the clarity of the documents and guidelines translating the EU rules</i>	The documents and guidelines are perceived to lack of clear definition and non-contradiction of the goals and preciseness of the language.	The clear definition or the non-contradiction of the goals or yet the preciseness of the language is missing.	The goals are clear and the language is precise.

▪ **Quality of the activities set up in the Control Plan**

- *Degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification and their frequency is established*

The certification body establishes the activities to be performed according to its perception about the importance of the product characteristics listed in the Specification. So, it is a matter of the certification body to decide which are the actual quality control points and how often to perform the verifications.

Therefore, it can be assumed that there will be an high degree of quality of the Control Plan when all the product characteristics recognized by the EU in the Specification are taken into account for building up the activities established in the Control Plan and the frequency of the controls is established; a medium level when some of the characteristics present in the Specification are not considered in the Control Plan or the frequency of the controls is not established; a low level when many of the product features are not included for building up the activities established in the Control Plan and/or the frequency of the controls is not specified.

Table 3.2 Operational indicator for the degree the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification

Operational indicator	Level of quality of the Control Plan		
	Low	Medium	High
<i>Degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification and their frequency is established</i>	Many product characteristics listed in the Specification are not taken into account for building up the activities established in the Control Plan and/or the frequency of the controls is not specified.	Some product characteristics listed in the Specification are not taken into account for building up the activities established in the Control Plan or the frequency of the controls is not specified.	All the product characteristics listed in the Specification are taken into account for building up the activities established in the Control Plan and the frequency of the controls is specified.

3.2.2 Organizational factors

- **Supervisors’ leadership behaviour**

- *Degree of street level bureaucrats’ perceptions of their supervisors’ leadership behaviour in promoting consistency in the interpretation of the rules*

From a street level bureaucrats’ viewpoint, the organizational support is embodied by their supervisors, whose actions will contribute to shape employees’ opinion of the organization, which in turn will influence the front-line workers’ performances.

Therefore, when considering the role of the street level bureaucrats in PDO context, the previous argumentation leads to think about the supervisor’ behaviour in terms of his leadership in promoting consistency in the interpretation of the rules within the team of street level bureaucrats.

It can be assumed that there will be: an high appraisal of their supervisors’ leadership behaviour when the superiors encourage the employees in gathering with colleagues, participating and reflecting on the best practices to be communally implemented in order to achieve consistency in the interpretation of the rules; a medium appraisal when the superiors lack of encouraging the front-line workers in gathering with colleagues, in participating and reflecting on the best practices to be communally implemented; a low appraisal when the superiors do not encourage the employees in gathering with colleagues, in participating and reflecting on the best practices to be communally implemented.

Table 3.3 Operational indicator for the supervisors’ leadership behaviour

Operational indicator	Assumption	Level of perception		
		Low	Medium	High
<i>Perceived degree of supervisors’ leadership behaviour in promoting consistency in the interpretation of the rules within the team of street level bureaucrats</i>	The degree to which supervisors are able to positively influence the employees in accomplishing their tasks and value employees’ contributions will have an effect on the front-line workers’ performance (Hutter and Manning, 1990).	The superiors do not encourage employees in gathering with colleagues, in participating and reflecting on the best practices to be communally implemented.	The superiors lack of encouraging employees in gathering with colleagues, participating and reflecting on the best practices to be communally implemented.	The superiors encourage employees in gathering with colleagues, participating and reflecting on the best practices to be communally implemented.

▪ **Organizational and supervisors' support**

- *Degree of street level bureaucrats' perception of the availability of resources such as time, facilities and equipment in performing the planned activities and training they receive*

The term “resources” does not only refer to money, time and staff, but also to “the storehouse of knowledge and practical advice implementers might turn to for assistance” (Hill, 2003).

The indicator used to assess this factor will be the degree of front-line workers' satisfaction with the availability of resources. It includes the following items:

1. Satisfaction with the availability of time, tools and equipment in performing the planned activities;
2. Satisfaction with the training they receive -training programme and provision of space to gather with colleagues and reflect on practice (Hill, 2003)-.

Table 3.4 Operational indicator for the perceived degree of availability of resources and training

Operational indicators	Assumptions	Level of perception		
		Low	Medium	High
<i>Perceived degree of availability of time</i>	Agencies may allocate their resources in the way which they consider will be the best achieve their ends (Rowan- Robisnson in Black, 2001) and this fact can have an effect on the implementation of the control system at the shop level and in turn in its performance.	They do not have the time they need to do their job well.	They do not always have the time they need to do their job well.	They have the time they need to do their job well.
<i>Perceived degree of availability of tools and equipment</i>		They do not have the tools and equipment they need to do their job well.	They do not always have the tools and equipment they need to do their job well.	They have all the tools and equipment they need to do their job well.
<i>Perceived degree of availability of training</i>		They do not receive the appropriate training they need to do their job well.	They do not always receive the appropriate training they need to do their job well.	They have the appropriate training they need to do their job well.
<i>Perceived degree of availability of space to gather with colleagues and reflect on practice</i>		There is no space to gather with colleagues and reflect on practice they need to do their job well.	Only sometimes colleagues gather and reflect on practice they need to do their job well.	They constantly gather and reflect on practice they need to do their job well.

- *Degree of street level bureaucrats' satisfaction with presence and use of incentives and promotions adopted for rewarding their performances*

It has been shown that also the reward and incentive system provides motivation for the employees to accomplish well their tasks (Jakobsen, 2009). In this context, it can be presumed that the motivation of the street level bureaucrats in accomplishing their tasks will result in their consistent interpretation of the rules.

Therefore, it can be assumed that there will be: an high degree of satisfaction with reward system when standards and methods used for evaluating and appraising the performance are fair and satisfactory; a medium degree when the standards and methods used for evaluating and appraising the performance are fair but they are not always implemented; a low degree when there is no appraisal of the good performance or if present, the standards used are unfair and the methods are unsatisfactory.

Table 3.5 Operational indicator for the degree of satisfaction with the presence and use of incentives and promotions

Operational indicator	Assumption	Degree of satisfaction		
		Low	Medium	High
<i>Degree of street level bureaucrats' satisfaction with the presence and use of incentives and promotions</i>	The controllers' behaviour may be the result of the rewards given accordingly to the number of formal actions taken, such as samples taken and warning given, as the officer will focus on that actions that will receive the approval from the managers (Black, 2001).	There is no appraisal of the good performance or if present, the standards used are unfair and the methods are unsatisfactory.	The standards and methods used for evaluating and appraising the performance are fair but they are not always implemented.	The reward system is fair and correct: standards and methods used for evaluating and appraising the performance are fair and satisfactory.

- *Presence of organizational practices aimed at influencing the relation regulator/regulated firm*

This indicator will consider the presence of:

1. The strategy of frequent rotation of the personnel to different geographical areas or to different companies
2. Internal rules, which require that all the reports by the field enforcers have to be scrutinized by other officers or specialists

in order to prevent controllers from establishing long term relationship with the regulatees and/or reduce the autonomy of the front line workers.

Table 3.6 Operational indicator for the degree the presence of organizational practices aimed at influencing the relation regulator/regulated firm

Operational indicator	Assumption	Degree of satisfaction		
		Low	Medium	High
<i>Presence of organizational practices aimed at influencing the relation regulator/regulated firm</i>	The presence of: 1. the strategy of frequent rotation of the personnel to different geographical areas or to different companies; or 2. internal rules (i.e. all the reports by the field enforcers have to be scrutinized by other officers or specialists) will prevent controllers from establishing long term relationship with the regulates and/or reduce the autonomy of the front line workers.	Neither the strategy of frequent rotation of the personnel to different geographical areas or to different companies, nor particular internal rules (i.e. all the reports by the field enforcers have to be scrutinized by other officers or specialists) are present.	n. d. (non determinate)	The strategy of frequent rotation of the personnel to different geographical areas or to different companies, or particular internal rules (i.e. all the reports by the field enforcers have to be scrutinized by other officers or specialists) are present.

- *Degree of street level bureaucrats' perception of communal moral norms*

It can be assumed that a consistent interpretation of the rules given by the street level bureaucrats is achieved not only thanks to the organizational support and supervisors' behaviour, but also due to a common sense of meaningfulness of the work the employees are performing. Therefore, there will be an high degree of communal moral norms when they feel they all share the same awareness about the importance of their role as certifiers who aims at verifying PDO quality; a medium degree when they feel not all of them share the same awareness; a low degree when they feel they do not share the same awareness about the importance of their role as certifies.

Table 3.7 Operational indicator for the degree of street level bureaucrats' perception of communal moral norms

Operational indicator	Level of communal moral norms		
	Low	Medium	High
<i>Degree of street level bureaucrats' perception of communal moral norms</i>	They do not share the same awareness about the importance of their role as certifiers who aims at verifying PDO quality.	Not of all them share the same awareness about the importance of their role as certifiers who aims at verifying PDO quality.	They all share the same awareness about the importance of their role as certifiers who aims at verifying PDO quality.

3.2.3 Personal background

- **Professional knowledge and training**

- *Degree of appropriateness of school achievement, working experience and attended training programme*

The degree of school achievement, working experience and training can be used as researchable indicator for evaluating the influence of the professional knowledge on the street-level bureaucrats' performance. This indicator arises from the consideration that the accomplishment of the inspection activities will be better performed when the street level bureaucrats have appropriate knowledge about what they are checking (Albersmeier, 2009). If they have familiarity with what they are dealing with, it can be assumed that they are more aware of the importance of their assessments and they are able to give suggestions and new ideas on the problems that they may encounter.

It can be assumed that the street level bureaucrats will have: an high level of knowledge and training when they have an appropriate background in the field of controls due to school achievement and/or working experience and they follow specific courses or training programme concerning PDO products; a medium level of knowledge and training when they lack in having an appropriate background in the field of controls due to school achievement/working experience or in following specific courses or training programme concerning PDO products; a low level of knowledge and training when they do not have any appropriate background due to school achievement/working experience and they did not follow any specific courses or training programme concerning the control of PDO products.

Table 3.8 Operational indicator for the professional learning and training

Operational indicator	Assumption	Level of professional knowledge and training		
		Low	Medium	High
<i>Degree of school achievement and attended training programme</i>	The accomplishment of the inspection activities will be better performed when the street level bureaucrats have appropriate* knowledge about what they are checking (Albersmeier, 2009).	The inspector does not have any appropriate background due to school achievement/working experience and he does not follow any specific courses or training programme concerning the control of PDO products.	The inspector lacks in having an appropriate background in the field of controls due to school achievement/working experience or in following specific courses or training programme concerning PDO products.	The inspector has an appropriate background in the field of controls due to school achievement/working experience and he follows specific courses or training programme concerning PDO products.

*appropriateness in terms of familiarity with what they are dealing with.

- **Individual moral norms**

- *Degree of street level bureaucrats' perception of the meaningfulness of their work*

As mentioned in Black (2001), “what is important is the officer’s own perception of his or her role and of the organisation’s expectations”. This leads to consider the degree of street level bureaucrats’ perception of the meaningfulness of their work as a researchable indicator for evaluating individual moral norms. In fact, the EU policy could leave no room for discretion to the implementers but in any case the personal moral norms can generate know-how differences between the individual street-level bureaucrats.

Therefore, it can be assumed that the street level bureaucrat has: an high degree of moral norms when he is aware of the importance of his role as certifier who aims at guaranteeing the PDO quality; a medium degree when he knows what is expected of him on the job but he does not feel that his work contributes to the accomplishment of specific EU and company goals; a low degree when he perceives that the work he does is not meaningful to him.

Table 3.9 Operational indicator for the degree of individual social norms

Operational indicator	Assumption	Level of individual social norms		
		Low	Medium	High
<i>Degree of street level bureaucrat's perception of the meaningfulness of their work</i>	“what is important is the officer’s own perception of his or her role and of the organisation’s expectations”(Black, 2001)	He perceives that the work he does is not meaningful in contributing the accomplishment of specific EU and company goals.	He knows what is expected of him on the job but he does not feel that his work contributes to the accomplishment of specific EU and company goals.	He is aware of the importance of his role as certifier who aims at guaranteeing PDO quality.

3.3 Street level bureaucrats’ performances

- *Degree of assurance of PDO characteristics established in the Specification*

The guarantee of product quality is achieved when there is consistency of the product characteristics over time. In the matter of PDO products, this means that official controls have to authenticate the compliance with the product requirements established in the Specification by means of constant verification procedures. These control activities, such as inspections and sampling, are set up in the Control Plan and they should be fully performed by the street level bureaucrats. By doing so, they verify the compliance with the product specifications through

supervision of all the actors involved in the production process. When the product receives the PDO certification, the activities established in the Control Plan have to be carried out with certain frequency.

Therefore, the explanation provided in chapter 2 with the figure 2.1 “Conceptualising quality” regarding the importance of the role of the street level bureaucrats in assuring the final PDO product quality, will be taken into account for the definition of this indicator. It can be assumed that there will be an high level of street-level bureaucrats’ performances if all the product characteristics established in the Specification, which may be both intrinsic and extrinsic attributes, are guaranteed due to the following aspects:

1. the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification
2. the street level bureaucrats implement all the inspection activities with an established frequency
3. it is clearly* specified how to handle any detection of non-conformity with the requirements
4. the treatment of any situation of non-conformity with the requirements is implemented

* Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

A medium level will be determined when product characteristics established in the Specification cannot be fully guaranteed due to the lack of one or two of the abovementioned features. Finally, it will be defined a low level of the street level bureaucrats’ performances when product characteristics established in the Specification cannot be guaranteed due to the lack of more than two of the abovementioned aspects.

Table 3.10 Operational indicator for the degree of assurance of PDO characteristics established in the Specification

Operational indicator	Level of performance		
	Low	Medium	High
<i>Degree of assurance of PDO characteristics established in the Specification</i>	Product characteristics established in the Specification are not guaranteed due to the lack of more than two of the following aspects: <ul style="list-style-type: none"> - the inspection activities set up cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the control 	Product characteristics established in the Specification are not fully guaranteed due to the lack of one or two of the following aspects: <ul style="list-style-type: none"> - the inspection activities set up cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the control activities with an established 	Product characteristics established in the Specification are guaranteed due to the following aspects: <ul style="list-style-type: none"> - the inspection activities set up cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the control activities with

	activities with an established frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.	frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.	an established frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.
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*Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

3.4 Horizontal alignment

The comparison of the street level bureaucrats' performances of two countries may lead to understand different degrees of assurance of PDO product characteristics and thus to trace the origin of the factors influencing different outcomes.

All the products protected by the European designation have to comply with the requirements established in the Reg. (EC) 510/2006. This fact lead to the consideration that, when comparing similar PDO products (equal EU product class -i.e. cheeses; fresh meat, pasta and so on) belonging to two different countries, the specifications should contain equal product description. In turn, the Control Plans which are developed on the basis of the characteristics mentioned on the Specification, should include equivalent verification procedures. Finally, the street level bureaucrats should perform the same behaviour when they interpret and deal with the translated EU guidelines.

Therefore, when comparing the street level bureaucrats' performances on similar PDO products (equal EU product class -i.e. cheeses; fresh meat, pasta and so on) belonging to two different countries, it can be assumed that there will be an high level of horizontal alignment when there are no differences in the following aspects:

1. the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification
2. the street level bureaucrats implement all the inspection activities with an established frequency
3. it is clearly* specified how to handle any detection of non-conformity with the requirements
4. the treatment of any situation of non-conformity with the requirements is implemented

*Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

A medium level of horizontal alignment will be defined when there are differences in one or two of the abovementioned aspects. Finally, a low level of horizontal alignment is established when differences exist in the more than two of the above mentioned characteristics.

Table 3.11 Operational indicator for the degree of horizontal alignment

Operational indicator	Level of horizontal alignment		
	Low	Medium	High
<i>Degree of horizontal alignment</i>	Differences between different countries in more than two of the following aspects: - the inspection activities set up in the CP cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the inspection activities with an established frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.	Differences between different countries in one or two of the following aspects: - the inspection activities set up in the CP cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the inspection activities with an established frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.	No differences between different countries in the following aspects: - the inspection activities set up in the CP cover all the product characteristics listed in the Specification - the street level bureaucrats implement all the inspection activities with an established frequency - it is clearly* specified how to handle any detection of non-conformity with the requirements - the treatment of any situation of non-conformity with the requirements is implemented.

*Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

4 Research method and design

The aim of this thesis is to understand the factors influencing the implementation of the control system at street-level bureaucrats' level of the EU legislation on PDO products, and whether dissimilarities between implemented control systems at street-level bureaucrats' level lead to differences in the product quality. The conceptual model is based on the literature and therefore it has to be tested. Besides further literature, questionnaire and interviews to the front-line workers will be conducted to validate the research model. The collected data shall provide some degree of validation about conceptual model, which may need adjustments, and thus about hypothesis and conclusions of this report.

4.1 Research methodology

A qualitative research is conducted to obtain data. Qualitative research focuses on understanding situations or phenomena from an insider's point of view. Therefore, it is oriented towards analyzing concrete cases in their temporal and local particularity, and starting from people's expressions and activities in their local contexts (Flick, 2002).

Qualitative data can be defined as empirical information about the world, not in the form of numbers. Qualitative data are attained through watching, asking and examining. A qualitative researcher has a wide range of possible empirical materials, and will use multiple data sources in a project.

The major disadvantage of qualitative research is that "the sample sizes are usually small and non-random, and therefore the findings may not generalize to the larger sample from which the sample was drawn "(Van der Stoep et al., 2009). However, qualitative research has some important advantages. Firstly, it produces more in-depth, comprehensive information. Secondly, it uses subjective information to describe the context, or natural setting of the variables under consideration, as well as the interactions of the different variables in the context. It seeks a wide understanding of the entire situation (Key, 1997).

In this thesis the factors affecting the performance of street level bureaucrats and the horizontal alignment in the operational systems in different EU countries are analyzed. Taking into account all the considerations explained above, a qualitative approach will be used in this research.

Case study designs represent the main design for social science (De Vaus, 2008). One or few cases are investigated to develop a “full” understanding of one or a few phenomena within that case (or those cases). “Case studies are often seen as prime examples of qualitative research- adopts an interpretative approach to data, studies “things” within their context and considers the subjective meanings that people bring to the situation” (De Vaus, 2008). Moreover, they provide a flexible approach, as they can be structured in different ways, and they have a theoretical dimension, in the sense that “collecting and analysing information from the case studies must be guided by theory” (De Vaus, 2008). Without the theoretical framework, they will be of little value for a wider generalisation, that is one of the purposes of the social science research.

Therefore, in this thesis a multiple case study will be developed to collect data and to test the conceptual research model, whether the particular set of variables, which were derived by literature analysis, will really result in the particular outcome. Put it in other words, the case studies will enable to verify whether the theory actually works in the real life situation. If it works, it is supported, if not, then it is necessary to understand why the predicted outcome did not occur (De Vaus, 2008).

4.2 Research design

4.2.1 Cases: cheeses

In this thesis, a case study will be used in order to obtain the data. The unit of analysis are the street level bureaucrats involved in the control system of the cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and in United Kingdom. They are both blue veined moulded cheeses but they belong to different countries and thus dissimilarities in the implementation of the control system at SLBs’ level may be found, expressed in differences in product quality.

Table 4.1 Cheeses: Gorgonzola DOP and Blue Stilton PDO

Name	Gorgonzola DOP	Blue Stilton PDO
<i>Description</i>	Whole cows' milk cheese, a soft table cheese, uncooked with characteristic green/blue veining.	Blue veined moulded cheese made in cylindrical form from full cream cow's milk with no added pressure and forming its own crust.
<i>Geographical area</i>	The entire territory of the provinces of Bergamo, Brescia, Como, Cremona, Cuneo, Milan, Novara, Pavia, Vercelli and the adjacent commune of Casale Monferrato in the province of Alessandria, forming a continuous area. (Only milk produced in such	The Counties of Leicestershire, Derbyshire and Nottinghamshire. (Milk comes from the designated area except in times of shortage when it may come from the surrounding counties of Cambridgeshire, Northamptonshire, Warwickshire, Staffordshire, Greater

	provinces may be used to produce and grant Gorgonzola cheese a DPO certification, ensuring its authenticity from the very raw material).	Manchester, Cheshire, Yorkshire and Lincolnshire).
<i>Background</i>	Connected with the traditional use of alpine pastures came the practice of concentrating the herds of cows within the territory of the commune of Gorgonzola and neighbouring areas at certain times of the year. The milk obtained was turned into cheese and matured in natural caves to acquire the characteristic veining due to the presence of specific strains of mould. These traditions have become established with time, evolving with the sector.	The cheese gained its reputation from being sold at the Bell Inn, a coaching inn, at the town of Stilton on the Great North Road in the early 18th century. The first literary evidence is in Daniel Defoe's "Tour through England and Wales" published in 1727 where he notes that in 1722 he passed "through Stilton, a town famous for cheese." Stilton was then made in the Melton Mowbray area of Leicestershire and the name has for at least the last 80 years been used in connection only with cheese made in the designated area according to a defined process.
<i>Acquisition/ Production method</i>	The fresh pasteurized milk fed into an open vat to which acid forming bacteria, a suspension of penicillium spores and selected yeast and rennet are added at 28 – 36 °C. Once the curds have formed, the curd is cut and placed in layers to allow the drainage of the whey. Afterwards, the curd is fed into moulds (about 14/15 kg each mould), where it remains for 36 hours and constantly turned. The moulds are then sealed and manually dry salted. Thus, the ripening period starts in stores at 2-7 °C with a relative humidity of 85-99%. After 3-4 weeks, the moulds are pierced with stainless steel needles. This operation allows air to enter the body of the cheese and create the blue veins. When the ripening period ends, the moulds are removed and the cheese is cut in pieces, which are wrapped with the aluminium foil, which aims at reducing the loss of the weight due to evaporation, protecting the coat against breakages and guaranteeing the organoleptic characteristics during transportation. Gorgonzola is sold at a minimum of 50 days.	The fresh pasteurized milk is fed into an open vat to which acid forming bacteria (starter cultures), a milk clotting agent (such as rennet) and penicillium spores are added. Once the curds have formed, the whey is removed and the curds allowed to drain overnight. The following morning, the curd is then cut into blocks to allow further drainage before being milled and salted. Each cheese requires about 24 lb (11 kg) of salted curd that is fed into cylindrical moulds. The moulds are then placed on boards and turned daily to allow natural drainage for 5 or 6 days. After 5 or 6 days, the cylinders are removed and the coat of each cheese is sealed by smoothing or wrapping to prevent any air entering the inside of the cheese. The cheese is then transferred to the store where temperature and humidity are carefully controlled. Each cheese is turned regularly during this ripening period. At about 5 weeks, the cheese is forming the traditional Stilton crust and it is then ready for piercing with stainless steel needles. This allows air to enter the body of the cheese and create the blue veins. Blue Stilton is sold at a minimum of 6 weeks, Mature Blue at a minimum of 10 weeks and Vintage Blue at a minimum of 15 weeks.
<i>Link</i>	The natural factors are connected with the climatic conditions of the production area, which are favourable for abundant and high quality fodder used to feed the dairy cows as well as the development of the microbiological agents which give the organoleptic and colour characteristics to the cheese. As for the human factors, the cheese has achieved wide distribution and is also used with traditional cereal-based preparations, typical of its area of origin.	The geographical conditions in the area produce a rich high quality milk. There is a unique pool of knowledge and expertise in the area which has been passed down through the generations. Unique local recipe.
<i>Control Body</i>	CSQA Certificazioni Srl Via San Gaetano n. 74 I-36016 Thiene (VI)	Product Authentication Inspectorate Ltd (PAI) Rowland House, 65 High Street, Worthing, West Sussex, BN11 1DN

Gorgonzola in numbers:

Gorgonzola cheese is produced in about 40 dairies representing a manufacturing elite composed of big national industries and smaller family businesses. More than 1,000 agricultural companies spread over the consortium territory supply milk to be used in Gorgonzola production. Annual overall production equals approx. 4 million rounds - 480,000 quintals - with a turnover of 350 million euros. Approx. 31% (130,000 quintals) is exported. Germany and France are the main consumer countries, absorbing more than a 50% of overall export. In Europe, they are followed by Switzerland, United Kingdom, the Netherlands, Scandinavian countries and Austria. Then, USA and Canada come. Japan is also a country where Italian cheeses usually meet with success. In particular, Gorgonzola cheese consumption grew in the Far East from few tens quintals imported until the 1990s, to 2,300 quintals imported in 2005. The takings equal 66 million Euro, about a 9% of Italian milk-dairy export value. Gorgonzola cheese is also among the most exported cow-milk national cheeses.

Blue Stilton in numbers:

There are just 6 dairies in the world licensed to make Blue Stilton cheese.

It takes 136 pints milk (78 litres) to make one 17 lb (8kg) Stilton cheese and over 1 million Stilton cheeses are made each year. More than 10% of output is exported to some 40 countries world-wide.

4.2.2 Cases: Certification bodies

CSQA Certificazioni S.r.l

CSQA Certificazioni S.r.l. (hereafter CSQA) is an independent certification body, the Italian leader in agri-food certification. It works at international level in different sectors -Agro-food, Public Administration and Environment, Public and health and social service, Tourism, Sport and Well-being, Services, School and Training, Culture- and its certification fields are quality, environment and safety, social responsibility and social communication, thanks to a multidisciplinary group and to the cooperation of highly qualified Italian and international professionals. CSQA holds accreditation by Accredia, which is recognized at EU level by EA¹⁰.

In the Italian context, it has been granted the ministry authorization for the control of diverse PDO, PGI, STG products. Among these products with EU recognition, CSQA is in charge of verifying

¹⁰ EA: European co-operation for Accreditation (<http://www.european-accreditation.org/content/home/home.htm>)

the quality of the cheese Gorgonzola DOP. It carries out inspection activities along the whole supply chain in order to check the compliance with the Specification requirements and thus to release the PDO certificate for certified stocks of cheese produced.

Product Authentication Inspectorate Ltd (PAI)

Product Authentication International (hereafter PAI) is an independent, private UK company. PAI was formed in 1996 by the current executive directors from an existing ISO 9000 certification company to meet a new need highlighted by BSE and new European legislation on Food Safety. It is one of the leading accredited Food Product Certifiers in Europe, by covering the fields of Food Authenticity, Labelling Claims and Food Chain Traceability. It operates from two offices in the UK. It also has partnerships in South America, China and Greece. PAI is accredited by the United Kingdom Accreditation Service (UKAS), which is recognized at EU level by EA, to certify feed, food, and farm products.

In the English context, it has been granted the ministry authorization for the control of some PDO, PGI, STG products. Among these products with EU recognition, PAI is in charge of verifying the quality of the cheese Blue Stilton PDO. It carries out inspection activities along the whole supply chain in order to check the compliance with the specification requirements and thus to release the PDO certificate for certified stocks of cheese produced.

4.3 Data collection

Data of any design can be collected with any data collection method (De Vaus, 2008): questionnaires, interview (structured or loosely structured), observations or analysis of documents.

In this thesis, interviews are used to collect data, as they are one of the tools for accessing people's perceptions, meanings, definitions of situations and constructions of reality (Punch, 2005).

Three main types of interviews exist (Punch, 2005), classified as structured, semi-structured and unstructured interviewing. Structured interviews leave little space for variation in response (Punch, 2005), as the respondent is asked a series of pre-established questions, with supplied preset response categories. Unstructured interviews which can be non-standardized, open ended, in-depth interviews, are used as a way of understanding the complex behaviour of people without

imposing any priori categorization (Punch, 2005). In semi-structured interviews, the topical directions is given much more preference and the interviews may be focused much more directly on certain topics (Flick, 2002). Therefore, they can be used within several approaches, such as focused interviews, semi-standard interview, problem centred interview, expert interview and ethnographic interview (Flick, 2002).

In this case, semi-structured interview method with open questions is chosen for the interviews with the street level bureaucrats, their supervisors and the organizational manager, belonging to CSQA and PAI, respectively the Italian and English control bodies. By making this preference, it can be assumed that the involved people do not have the feeling of being controlled but the perception that I am interested in their experiences, methods and motivation. By asking open questions, I give them the opportunity to let them share their experiences more easily. The disadvantage of this method is that it has the risk to spend too much time on one specific topic and spending less time on other questions.

The development of the conceptual research model in the previous chapter allowed to identify the topics to be studied in order to understand the outcome of potential different control activities in different realities. In turn, the researchable indicators are used to construct precise questions utilized as benchmarks for semi-structured interview method with open questions.

A presentation letter explaining who is the researcher, the thesis project and the reason why they were contacted, was addressed to the organization CSQA (Appendix 1) and to the actors involved in the certification of the Gorgonzola PDO (Appendix 2). After they confirmed their collaboration for this part of the thesis, semi-structured interviews were taken within the company. Thus, it was possible to interview the supervisor of the street-level bureaucrats, his colleagues (five persons) as reviewers of other PDO products, and some of their managers too (two persons). All these interviews were made to have a broader overview of what is going on within the organization. Instead, the three inspectors dealing with the control procedures of Gorgonzola are rarely physically present in the company due to the distance between the location of the headquarter (Thiene -VI-) and the area where they daily work (regions of Lombardy and Piedmont). Therefore, it was not possible to talk with them face to face and a questionnaire (Appendix 3), which was the baseline for the interviews, was sent to those persons, who filled it in and sent it back. When their answers were not complete enough to me, I tried to contact them again but I did not have any

reply. Therefore, some information are missing and/or they arise from my own research on inspection activities for Gorgonzola.

The same presentation letter used for CSQA was addressed to the organisation PAI group and to the actors involved in the certification of the Blue Stilton. After they confirmed their collaboration for this part of the thesis, they explained me there is just one inspector involved in the assurance of Stilton cheese, who also retired last year, and the PAI group is still looking for a person who can replace him and take his work. Therefore, I slightly modified the questions of the questionnaire regarding the communal moral norms and the relationship between the respondent and his colleagues. Then, I asked whether he could kindly fill in the questionnaire, even though he is not working anymore. He sent it back to me, while his reviewer did not. When the answers were not clear enough to me, I tried to contact him again but I had no replies. Therefore, some information concerning the inspection activities for Stilton are missing and/or they originate from my own research.

Street level bureaucrats' performance, which will see result in the degree of assurance of the PDO characteristics listed in the Specification, can be derived by:

- checking whether all the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification (expert's evaluation)
- asking whether the street level bureaucrats implement all the inspection activities with an established frequency (semi-structured interview method with open questions)
- checking whether the Control Plan clearly specifies how to handle any detection of non-conformity with the requirements (expert's evaluation)
- asking the street level bureaucrats' perception about the actual implementation of the treatment of any situation of non-conformity (semi-structured interview method with open questions)

Finally, the degree of the horizontal alignment between the two European Member States-Italy and United Kingdom- will be derived by comparing the assessments of the vertical alignment. By comparing each of the items of the indicator for the street level bureaucrats' performances, it is possible to derive possible differences at the shop level between the two control systems. These dissimilarities may result in different degree of assurance of the quality due to different

interpretation of the PDO legislation. They can be brought back up to the specific factors influencing the implementation of the control system at street level bureaucrats' level.

5 Analysis and results

In this chapter, firstly the performance of street-level bureaucrats in each country will be examined, followed by the analysis of the horizontal alignment between Italy and United Kingdom. In order to clearly explain the factors influencing the outcomes in each EU Member State, Italian and English context will be considered separately.

Both descriptive analyses hold the same structure. The questions, which were formulated to support the indicators, are grouped in three parts in the questionnaires (appendixes 3 and 4), and these clusters will be also used in this section. Initially the answers to the questions related to the legal framework will be provided, then the outcome of the organizational factors will be shown; finally the information regarding personal background will follow. In addition to this, the evaluation of an expert regarding the quality of the two specific Control Plans will be reported. The classification of the indicators in low, medium and high level, which was set up in chapter 4, will permit to assess the outcomes of all these findings, the degree of street-level bureaucrats' performances separately in Italy and in United Kingdom. At the end, it will be possible also to establish the degree of horizontal alignment between the two countries. These evaluations will allow to identify possible bottlenecks and thus to draw suggestions for improvement.

5.1 Italy

The CSQA is organized in a way that the inspectors are self-employed. They make a picture of the situation of the inspected firms and they deliver their reports to the reviewer of that particular PDO product, who is an employee of CSQA, responsible of coordinating the inspection activities. In case of non-conformity with the requirements, the inspector notes down the breach and informs his superior about it. The reviewer will evaluate the consistency of the detection and the possible repercussions of the breach on the production. Then, the technical manager will confirm the decision taken by the reviewer. Thus, the company will be notified and it will be asked to propose a solution. The technical manager approves the suggestion of the company to solve the problem which is arisen. The CSQA will then decide whether to take further actions, such as additional inspection activities, to take the seal out of the products which cannot be certified, to inform the public authority of vigilance and so on. If the non-conformity is serious, the case is brought to the

Executive Committee of Certification (CEC), which assembles every week and will eventually approve or disapprove the gravity. If the non-conformity is confirmed as severe, the documentation is handed into the public authority of vigilance, that is the Central Inspectorate for Fraud Repression. All the procedures are contained in the Manual of Quality of the CSQA.

5.1.1 Outcome of the questionnaire and interviews

Legal framework

- **Clarity of the documents and guidelines translating the EU rules**

In order to get an insight concerning this factor, firstly it was asked whether the interviewees know and use the list of European and national rules and documents, based on which Control Plan is set up. Thus, the first questions were made to make sure they knew what they were dealing with, while the last items directly regarded the clarity of the rules, as unambiguous and non-contradictory. Even though they know the PDO legislation, they affirm they rarely use it. They base their work and their activities on the Control Plan and sometimes on the Specification. They all agreed that the language used is precise. However, some of the supervisors perceive some contradictions in both EU and national rules.

For example, they mentioned the fact that a requirement listed in the Reg. (EC) 510/2006 establishes the definition of geographical area in order to obtain the PDO mark. However, it is not clearly specified how much precise the borders must be described. The supervisors think that in Italy the description is required to be extremely detailed as the geographical region of origin is believed one of the most important aspects characterizing the quality of PDO products. Instead, they wonder about the definition of the geographical boundary made by other EU countries, which may have not regional culinary tradition and thus they may not pay special attention to this issue.

Moreover, they affirmed that some specifications were approved by the EU but they contain too detailed and ambiguous information about that product. This fact lead to difficulties in setting the inspection activities in the Control Plans. As the regulated companies involved in their production chain have troubles in the compliance with the requirements, they have asked for amending some of them, but changes have not been done yet and the controls must be performed in any case. Thus, the certification body fixed its own rule in agreement with the producers of that product.

Finally, there are some questionable items when looking at the Italian documents translating the EU rules. For example, it is not clear whether the small companies which package the product on their own, shall have sanitary permission or the regional authorization is enough. Therefore, there is not a unique behaviour when dealing with these cases, in the sense that the certification company will check the sanitary permission only when the regional rules set in province where the company is located asks for it.

However, the specific case of Gorgonzola does not show any abovementioned problematic points. Also, the inspectors agreed upon the feasibility of the implementation of all the certification activities established in the Control Plan.

Table 5.1 Results regarding the perceived degree of the clarity of the documents and guidelines translating EU rules (Italy)

Operational indicator	Results	Score
<i>Perceived degree of the clarity of the documents and guidelines translating the EU rules</i>	<p><u>Inspectors</u>: they know the EU legislation but they do not use it, or better say, they use indirectly, as they follow the CP, which is based upon documents which are derived from the EU regulations. They perceive the CP unambiguous and non-contradictory.</p> <p><u>Supervisors</u>: they know the EU legislation but they rarely use it, as they usually use the CP and the Specification. They use the EU documents only for managing critical situations which are arisen. In some cases, half of them thinks both EU and national documents are ambiguous and contradictory.</p>	<p>Medium</p> <p>The Control Plan is perceived unambiguous and non-contradictory, even though half of the supervisors think that both EU and national documents are ambiguous and contradictory.</p>

Organizational factors

▪ Supervisors' leadership behaviour

The supervisors' behaviour was investigated by asking to the inspectors whether they feel their supervisor encourages them in gathering with colleagues and participating and reflecting on the best practices to be communally implemented. Thus, it was asked to provide examples which demonstrate this supervisors' behaviour.

The inspectors explained that they meet with their colleagues only once a year for a convention which is held at the headquarter of CSQA. This meeting aims at updating the inspectors regarding general issues. In case some products require specific activities or some changes have been made, specific workshops are scheduled. However, during the year the supervisor constantly provides

them feedback (by phone or via mail, occasionally by meeting face to face) of their work and keeps them updated regarding communal procedures to be followed.

For example, when an inspector has to control a new product for him, the supervisor makes him in contact with the previous inspectors, so that they can inform the colleague about the problems which may have encountered with some companies involved in the production chain of that particular product. Moreover, it happens that the supervisor asks for suggestions regarding new templates of report to be used for the inspections of a product which has lately obtained the PDO recognition.

Table 5.2 Results regarding the supervisors' leadership behaviour (Italy)

Operational indicators	Results	Score
<i>Perceived degree of supervisors' leadership behaviour in promoting consistency in the interpretation of the rules within the team of street level bureaucrats</i>	<u>Inspectors</u> : they all agree the supervisor constantly provides them feedback of their work and keeps them updated regarding communal procedures to be followed.	High The superiors encourage employees in gathering with colleagues, participating and reflecting on the best practices to be communally implemented.

▪ **Organizational and supervisors' support**

In order to explore the organizational and supervisors' support, it was asked to the inspectors to define the time, tool, equipment and training they need to perform their work and whether they actually have, as provided by the company for which they work for.

Considering the Gorgonzola case, they affirm they need about 30 minutes to check the livestock farming, while they need 3-4 hours for the dairies. They have the time and all the tools they need for their work. There is not limit of time, as at the beginning of the year the supervisor provides them the work they have to perform in the whole year and thus they can manage their own time. When they inspect the companies, they receive all the information they need regarding the firm to be checked and any resource they need (navigator, mobile phone, any instruments they need to take samples).

In relation to the training, they receive a work-shadowing for 3-4 inspections when they are asked to perform control activities of a new product, then they will keep updated through constant supervisor' s feedback and the annual meeting. The inspectors think the initial work-shadowing is a good and sufficient start for their work. In case inspection problems occur, they will notify their supervisor, who will decide whether it is worth to contact also the colleagues and meet with them to discuss.

Also the supervisors were involved in this part; they were required to think about the time and facilities the inspectors need to accomplish their task and whether they think they actually have. Their answers matched with the inspector' responses. Moreover, they were asked to consider also their situation, explaining the time, tools and training they need to perform their own work well and if the company provides everything they need too.

They all agree upon the fact that they have difficulties in managing well their work. The 40 hours per week are enough for doing everything is required, however they should need more time to delve into the information they are interested in for a complete and detailed work. They are generally satisfied with the facilities they have, even though they complain with the new information system, which could be improved. The problem is that CSQA manipulates a huge amount of different information and they would like to have an uniform procedure for all the cases. The computerization of the data which were in paper takes time and it is still in process. Thus, it slows down the whole work, as some information would be found in paper while others in the pc and the search for the data needed becomes time-consuming.

In relation to the training, the superiors said that the training the inspectors receive is not fully appropriate, they should receive more legislative updating. Considering their situations, they all received an initial training by attending a 40 hours-course with a qualifying examination. However, after achieving that certificate, they do not receive any updating training by CSQA. Some of them follow workshops and conferences, but their knowledge is mainly based upon personal studies and experience. For this reason, they generally think they do not receive an appropriate training to do their job well.

Considering the availability of space, the superiors believe they do not have enough space to gather with colleagues and reflect on practices. If needed, they meet with the colleagues during the lunch break to discuss about difficulties which may have been arisen. However, some of them admit that they do consider their self-documentation is enough to solve any problem. If they have any doubt, they should directly contact their supervisor. Finally, some of them also think the inspectors do not have enough opportunities to gather with colleagues.

The table below only shows the results concerning the perceived availability of all resources the inspectors need to accomplish their tasks, as it is the operational indicator directly linked with the

outcome of the research model. However, the supervisors' situations will be also considered when analysing the findings of this analysis.

Table 5.3 Results regarding the perceived degree of availability of resources and training (Italy)

Operational indicators	Results	Score
<i>Perceived degree of availability of time</i>	<p><u>Inspectors</u>: They have the time they need to inspect all the assigned companies to be checked.(They receive the whole work at the beginning of the year and they manage their time by themselves for the inspection activity)</p> <p><u>Supervisors</u>: they think the inspectors have the time they need. They base upon their own assessment about the time needed to perform the work (sometimes they also do inspections and thus they know how much time is required)</p>	<p>High They have the time they need to do their job well.</p>
<i>Perceived degree of availability of tools and equipment</i>	<p><u>Inspectors</u>: they think to receive all the tools and equipment to perform their work well.</p> <p><u>Supervisors</u>: they think the inspectors have all the tools and equipment they need.</p>	<p>High They have all the tools and equipment they need to do their job well.</p>
<i>Perceived degree of availability of training</i>	<p><u>Inspectors</u>: when they start working, they receive the a work-shadowing. Once a year there is a convention, which is a shaping event for all the inspectors. They think these actions, together with their studies, are enough for their work.</p> <p><u>Supervisors</u>: they think the inspectors do not receive a fully appropriate training they need as they should receive more legislative updating. Moreover, the superiors do not receive any updating training organized by CSQA.</p>	<p>Medium They perceive to receive the appropriate training they need to do their job well but their superiors think they should receive more legislative updating.</p>
<i>Perceived degree of availability of space to gather with colleagues and reflect on practice</i>	<p><u>Inspectors</u>: they gather with their colleagues only during the annual convention and in case there are problems regarding the inspection activities. They think they are enough.</p> <p><u>Supervisors</u>: they think they do not have enough opportunities to gather with colleagues. Some of them believe the inspectors are in the same situation.</p>	<p>Medium They gather and reflect on practice they need to do their job well, even though some supervisors do not agree with this statement.</p>

The presence of a reward system within the company was investigated by asking to the inspectors whether they know if a reward system exists, if they are aware of the standards used for evaluating their performances and if present, whether they are satisfied with the methods used for appraising their work (correctness/fairness -getting incentives and promotions according to your results and efforts- etc). The inspectors affirmed they do not receive any incentive. Thus, they could not evaluate their satisfaction concerning the standards used to appraise their work. They are paid on the basis of the number of the companies to be controlled. However, they know their

work is judged on the basis of the completeness of their reports, even though there is not an objective scale for the assessment.

The same questions were addressed also to the supervisors. They agreed upon the fact that the inspectors do not receive any monetary reward according to their good job. However, they stated that, based upon the work performed by the inspectors during the year, they will decide the load of work to assign to each inspector the following year. If they worked well, they will receive more firms to control. As a consequence, they will earn more.

When considering their own situation, the supervisors admitted they receive neither any incentive nor any promotion. They do not know how their work is judged.

The table in the next page regards only the information linked to the inspectors' satisfaction with the reward system. However, the supervisors' viewpoint will be taken into account when drawing conclusion from the collected information.

Table 5.4 Results regarding the degree of satisfaction with the presence and use of incentives and promotions (Italy)

Operational indicator	Results	Score
<i>Degree of street level bureaucrats' satisfaction with the presence and use of incentives and promotions</i>	<p><u>Inspectors</u>: they do not receive any incentive. They know their work is judged on the basis of the completeness of their reports.</p> <p><u>Supervisors</u>: based upon the work performed by the inspectors during the year, they will decide the load of work to assign to each inspector the following year. If they worked well, they usually will receive more firms to be controlled. This is the only reward system which is adopted. There are no monetary promotions.</p>	<p>High The reward system is fair and correct: standards and the methods used for evaluating and appraising the performance are fair and satisfactory.</p>

The presence of organizational practices aimed at influencing the relation between regulator and regulated firm was studied by asking to the inspectors how often they control the same firm. The same question was addressed to their supervisor. The inspectors stated that they usually inspect the same companies for 2-3 years, as it is ruled by Accredia. In case the rotation is not feasible, then there will be inspection-monitoring by means of work-shadowing or replacement once in a while. However, they noticed that when there is always the same inspector over the years, the company will show more helpful and friendly in case of something wrong in the production chain.

The supervisors declared the same. In case the rotation is not feasible (i.e. product produced by few companies spread out for wide lands so that one inspector will check all the firms -not the case for Gorgonzola though-), then there will be inspection-monitoring by means of work-shadowing once a year to avoid the companies become familiar with the inspectors.

Table 5.5 Results regarding the presence of organizational practices aimed at influencing the relation between regulator and regulated firm (Italy)

Operational indicator	Results	Score
<p><i>Presence of organizational practices aimed at influencing the relation regulator/regulated firm</i></p>	<p><u>Inspectors</u>: they usually inspect the same companies for 2-3 years, as it is ruled by Accredia. In case the rotation is not feasible, then there will be inspection-monitoring by means of work-shadowing or replacement once in a while. However, when there is always the same inspector, the company will show more helpful and friendly in case of something wrong in the production chain.</p> <p><u>Supervisors</u>: they usually inspect the same companies for 2-3 years, as it is ruled by Accredia. In case the rotation is not feasible(i.e. product produced by few companies spread out for wide lands so that one inspector will check all the firms-not the case for Gorgonzola though-), then there will be inspection-monitoring by means of work-shadowing once a year to avoid the companies become familiar with the inspectors.</p>	<p>High Long-term relationship between inspector and regulated firm is avoided by implementing the principle of rotation.</p>

In relation to the perception of communal moral norms, it was asked to the inspectors whether they feel they all share the same awareness about the importance of their role as certifiers and if they could provide concrete examples which demonstrate this common consciousness. They think there is a communal behaviour, even though they gather once a year for the convention, unless there are problems concerning the product they are inspecting so that they meet also with their supervisor and colleagues. The following example was used to explain the joint moral conduct: when they have to inspect a new firm, they read the report of the previous years. Based on the way it is written, they can perceive the communal approach they use for accomplishing their task.

Also the supervisors confirmed this perception of communal enthusiasm among inspectors for their work. I.e. the supervisors often receive information about the companies inspected which are not required by simply following the control activities established in the Control Plan. Thus, they think that this behaviour shows that the inspectors are all aware of the importance of their role as certifiers.

Table 5.6 Results regarding the degree of street level bureaucrats' perception of communal moral norms (Italy)

Operational indicator	Results	Score
<i>Degree of street level bureaucrats' perception of communal moral norms</i>	<p><u>Inspectors</u>: they gather once a year for the convention, unless there are problems concerning the product they are inspecting so that they meet also with their supervisor and colleagues. However, they feel they share the same norms. I.e. when they have to inspect a new firm, they read the report of the previous year. Based on the way it is written, they can perceive the communal approach they use for accomplishing their task.</p> <p><u>Supervisors</u>: they define their self the strategic checker in the network of inspectors. They provide constant feedback to each inspector (talk face to face; by phone; via mails) and they gather them whenever they see different approach adopted to evaluate similar cases. They perceive communal enthusiasm among inspectors for their work. I.e. the supervisors often receive information about the companies inspected which are not required by simply following the control activities established in the CP.</p>	<p>High</p> <p>They all share the same awareness about the importance of their role as certifiers who aim at guaranteeing the PDO quality.</p>

Personal background

▪ Professional knowledge and training

In order to establish the degree of inspectors' professional knowledge and training, it was asked to indicate their highest school achievement, which knowledge they need for accomplishing their tasks and whether they think their studies are suitable for their actual work. Finally, it was asked to specify whether they attend any course or training programme concerning the issues of official controls in PDO product in general, and specifically about the production chain of Gorgonzola.

Table 5.7 Results regarding the degree of school achievement/working experience and attended training programme (Italy)

Operational indicator	Results	Score
<i>Degree of school achievement and attended training programme</i>	<p><u>Inspectors</u>: they have at least a Bachelor degree in Agriculture. They all took courses concerning quality (ISO; BRC; IFS etc). They all consider their knowledge appropriate for the work they do. There are no specific training courses for PDO (This year the ministry will organize the first one at national level). It is not organized any particular course for Gorgonzola, also because it is considered an "easy PDO", as it cannot be sold already grated and thus it does not have any special issue to be considered. However, whenever problems occur, the supervisor will gather them to discuss.</p>	<p>Medium</p> <p>The inspectors have appropriate backgrounds in the field of controls due to school achievement. However, they do not follow specific course or training programme concerning PDO products.</p>

▪ **Individual moral norms**

The inspectors’ individual moral norms were examined by asking to the inspectors what is expected of them on the job and what is their idea regarding the importance of being certifier of PDO products (how important/meaningful they think is their job).

Table 5.8 Results regarding degree of street level bureaucrat’s perception of the meaningfulness of their work (Italy)

Operational indicator	Results	Score
<i>Degree of street level bureaucrat’s perception of the meaningfulness of their work</i>	<u>Inspectors:</u> they all agree with the fact that the role of the certifier is important to guarantee the quality of those products protected by EU designation. The whole production chain is monitored so that it is possible to highlight possible weak spots for quality assurance along the chain. They also believe that the certification of controlled products is something more concrete than the certifications of process or system.	High All of them are aware of the importance of their roles as certifiers who aim at guaranteeing the PDO quality.

5.1.2 Result of expert’s evaluation

An Italian expert in dairy products and PDO legislation was contacted in order to get an assessment regarding the Control Plans. Here below his considerations and remarks.

The Control Plan for Gorgonzola cheese is generally coherent with the requirements listed in the Specification. Depending on the issue to be assured, the controls can be documental, inspection, analytical. In the scheme of the controls, also the possible situation of non-conformity are described, as well as their level of importance and the corrective actions decided by the CSQA as a consequence of a potential verification.

However, the percentage of 48 of fat in the dry matter is the only analytical control performed by the inspector of the certification body, who has to prepare samples for issue to Laboratory for testing. This is not a lack of the professionalism of the CSQA but it is due to the fact that the Specification is really generic and there are not particular restrictions. Other characteristics related to the raw material, production process and final product are only checked through documents and in-house findings.

Here below some examples showing how the general description of the Specification results in actual few controls for the final quality of the Gorgonzola:

PRODUCTION PROCESS

The production process is described in detail in the Specification and therefore there are inspection activities concerning the pasteurization, the type and the temperature at which starter culture, rennet and Penicillin spores are added. Also the ripening conditions are fixed in the specification, with a precise width of temperature and relative humidity.

FINAL PRODUCT

The Gorgonzola DOP cheese must show these characteristics:

- cylinder-shaped with flat sides;
- straight side at least 13cm high;
- diameter between 20 and 32 cm;
- external: non-edible greyish and/or pinkish crust
- internal: uniform, white and straw-coloured, mottled with characteristic green/blue veining
- minimum 48 % milk fat in the dry matter

Only the minimum of 48% milk fat in the dry matter is directly checked by the certification body. In relation to the other characteristics, the assessor review only confirms in-house findings and check-internal records.

The amount of salt in the final product is not specified. However, this parameter, together with the percentage of humidity, should be seriously considered, as it influences the yield, the consistency of the cheese, the development of the aroma compounds and it also concern the healthy issue.

Thus, it can be affirmed that the Control Plan for Gorgonzola is generally coherent with the requirements listed in the Specification. A positive aspect is that the amount of firms as well as the frequency of the controls is established in each inspection activity according to the item to be checked. Similarly, it is also specified how to handle any detection of non-conformity with the requirements. However, the Specification is general and thus there are no specific restrictions for the production of Gorgonzola. If the Specification listed more requirements, then also the controls set up in the Control Plan could be more precise.

Table 5.9 Results regarding degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the specification (Italy)

Operational indicator	Results	Score
<i>Degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification and their frequency is established</i>	The control plan for Gorgonzola is generally coherent with the requirements listed in the Specification. The amount of firms as well as the frequency of the controls is also established in each inspection activity.	High All the product characteristics listed in the Specification are taken into account for building up the activities established in the Control Plan. The frequency is also established according to what has to be controlled.

5.1.3 Street-level bureaucrats' performances

The performance of the street level bureaucrats will determine the degree of assurance of PDO characteristics. Different aspects were taken into account: the amount of product features listed in the Specification and which are taken into account in the Control Plan, the frequency of the planned verification activities, the feasibility of the control activities and of the corrective actions according to the inspectors' perception and to the expert's evaluation.

As said before, the expert in the field of dairy product and PDO legislation stated that the Specification of the Gorgonzola PDO cheese is not really specific and precise for this product, it is quite general to be actually able to measure something, and thus it is understandable that all the product characteristics which are described are essentially considered in the activities set up in the Control Plan. Moreover, the street level bureaucrats agree upon the fact that the inspections they need to perform are practicable and they do not encounter any problem. In addition to this, both inspectors and supervisors affirmed they do not encounter any obstacle in implementing the procedures in case a situation of non-conformity is detected. Therefore, these considerations lead to consider high the level of performance of the inspectors in accomplishing their task, that is the verification of the PDO product characteristics established in the Specification.

Table 5.10 Results regarding the degree of assurance of PDO characteristics established in the Specification (Italy)

Operational indicator	Results	Score
<i>Degree of assurance of PDO characteristics</i>	<p><u>Inspectors</u>: they agree upon the fact that the inspections they need to perform are practicable and they do not encounter any problem.</p> <p><u>Superiors</u>: they do not encounter any obstacle in implementing the procedures in case a situation of non-conformity is detected</p> <p><u>Expert</u>: the Specification of the Gorgonzola is quite general and thus it is understandable that all the product characteristics which are described are actually considered in the activities set up in the Control Plan.</p>	<p>High</p> <p>Product characteristics established in the Specification are guaranteed due to the following aspects:</p> <ul style="list-style-type: none"> - the inspection activities set up in the CP cover all the product characteristics listed in the Specification (OK[°]) - the street level bureaucrats implement all the control activities (OK[°]) with an established frequency (OK[°]) - it is clearly* specified how to handle any detection of non-conformity with the requirements (OK[°]) - the treatment of any situation of non-conformity with the requirements is implemented (OK[°])

[°]OK: the condition is satisfied

[~]NO: the condition is not satisfied

5.2 United Kingdom

The PAI system is very similar to CSQA. PAI have full time management/supervisory staff and then they have self-employed inspectors who specialise on a product or geographical basis. Thus for Stilton they have had one person who until last year was the only inspector the Stilton Dairies had had. He also undertook inspections for other cheeses recognized with EU designation.

All non-compliances identified by the inspector are discussed with the dairy at the time of the inspection and a period is given by which time this must be rectified. Minor non-compliances concern procedural or paperwork errors or in some cases labelling issues. All of them have to be confirmed by PAI management in writing and then followed up to ensure compliance.

In the event of any more serious non-compliances which are not resolved to the satisfaction of PAI, the SCMA (Standing Committee of Ministers Responsible for Agriculture) has a process in place where the Principals of each member company will consider the seriousness of the non-compliance and agree in conjunction with PAI the time scale within which this should be resolved. If it has not been satisfactorily resolved, then the SCMA has the ultimate right to withdraw the licence which allows that dairy to use the name Stilton. Therefore, the seriousness of any non-compliance is judged at first by the PAI inspector, endorsed by the full time staff manager at PAI and if necessary further endorsed by the SCMA.

5.2.1 Outcome of the questionnaire and interviews

Legal framework

As for the Italian situation, firstly it was asked whether the interviewee knows and uses the list of European and national rules and documents, based upon which Control Plan is set up. Then, the inspector was invited to describe his perception in relation to the clarity of the rules, as unambiguous and non-contradictory.

He explained that the UK Ministry of Agriculture was overseeing the control of documentation, for example EN45011, which Inspection bodies were required to follow. This was in 1995, prior to the implementation of PDO's for Stilton (Blue & White), which are referred to in Nigel White's replies. Inspection documentation was constructed by PAI, as there was/is no formal documentation, due to the fact that each product application is different, and the inspections are adapted accordingly.

For the implementation of PDO designation, PAI and his-self joined up. For example, he agreed to join PAI, as he could not carry out the UK accreditation process. They drew up a Standard for the different cheeses involved (as identified by Nigel White), and then they produced a checklist of questions which were to be answered during the inspection process. Any non-compliances could be identified from the checklist, and were agreed with the Producer, prior to leaving the production site, and reported to PAI , for follow-up.

He thinks that the checklist and the standards for the product are originally adequate to satisfy UK Audit Service. Moreover, he believes that the documents used are quite adequate, considering the varying size of the quantity of cheese being produced. Base upon these information, it can be assumed that the goals of the documents and guidelines translating EU rules are clear and the language is precise.

Table 5.11 Results regarding the perceived degree of the clarity of the documents and guidelines translating EU rules (United Kingdom)

Operational indicator	Results	Score
<i>Perceived degree of the clarity of the documents and guidelines translating the EU rules</i>	The checklist and the standards for the product are originally adequate to satisfy UK Audit Service. Moreover, the documents used are quite adequate, considering the varying size of the quantity of cheese being produced.	High The Control Plan is perceived unambiguous and non-contradictory.

Organizational factors

▪ Supervisors' leadership behaviour

The supervisor's leadership behaviour could not be investigated, as he did not have a supervisor, but he reported his activities to the reviewer, Food Manager at PAI. Moreover, the inspector did not have any colleagues to gather with for reflecting on the best practices to be communally implemented.

Table 5.12 Results regarding the supervisors' leadership behaviour (United Kingdom)

Operational indicator	Results	Score
<i>Perceived degree of supervisors' leadership behaviour in promoting consistency in the interpretation of the rules within the team of street level bureaucrats</i>	<u>Inspector</u> : he did not have any supervisor.	n. d. (not determinable)

- **Organizational and supervisors' support**

In order to explore the organizational support (the supervisor's support cannot be detected for the abovementioned reason), it was asked to the inspector to define the time, tool, equipment and training he needs to perform his work and whether he actually has, as provided by the company whom he is joining up.

He stated that he did not inspect farms as this was not included in the PDO application, which was the basis of the inspection activity. Instead, an inspection of production could be from 2-4 hours per site. He needs car, correct documentation, cheese borer for testing cheese and he affirms to have the time and any tool he needs to do his job well. Moreover, it is required a thorough knowledge of cheese-making processes, together with practical experience and he thinks he has. In fact, even though PAI does not provide any training, the certification company recruited him as an expert in the field, with appropriate background and experience to successfully accomplish his tasks. However, he did not mention what he does or read to keep himself up-to-date.

As his work was carried out on his own, he did not have any accompaniment, but he was checked by a PAI auditor at random, i.e. a witnessed inspection, to satisfy PAI audit requirements.

Table 5.13 Results regarding the perceived degree of availability of resources and training (United Kingdom)

Operational indicators	Results	Score
<i>Perceived degree of availability of time</i>	The has the time he needs to inspect all the assigned companies to be checked. He is not a PAI's employee and he manages its own time.	High He has the time he needs to do his job well.
<i>Perceived degree of availability of tools and equipment</i>	The inspector thinks to have everything he needs to perform his work well.	High He has all the tools and equipment he needs to do his job well.
<i>Perceived degree of availability of training</i>	Even though PAI does not provide any training, he affirms to have a thorough knowledge of cheese-making processes, together with practical experience, but he did not mention how he keeps himself up-to-date.	Medium He thinks to have the knowledge and experience he needs to do his job well, but he do not receive any training and he does not specify how he keeps himself up-to-date.
<i>Perceived degree of availability of space to gather with colleagues and reflect on practices</i>	He does not have any colleague.	n. d. (not determinable)

The inspector did not answer the question related to the reward system. He justified it by saying he is not an employee of PAI and thus he does not receive anything.

Table 5.14 Results regarding the degree of satisfaction with the presence and use of incentives and promotions (United Kingdom)

Operational indicator	Results	Score
<i>Degree of street level bureaucrats' satisfaction with the presence and use of incentives and promotions</i>	He did not answer the question related to the reward system. He justified it by saying he is not an employee of PAI and thus he does not receive anything.	n. d. (not determinable)

Also the question concerning the presence of organizational practices aimed at influencing the relation between regulator and regulated firm, the inspector affirms he was the only front-line worker for Stilton, inspecting the same companies twice a year. After the inspection activity, the completed assessment report was sent into the PAI office where it was reviewed following the receipt of satisfactory test results and any responses to non-conformances raised. However, he was checked by a PAI auditor at random, i.e. a witnessed inspection, to satisfy PAI audit requirements. He has not been carried out inspections since October 2010, when he retired.

Table 5.15 Results regarding the presence of organizational practices aimed at influencing the relation between regulator and regulated firm (United Kingdom)

Operational indicator	Results	Score
<i>Presence of organizational practices aimed at influencing the relation regulator/regulated firm</i>	As the only inspector, he was inspecting the same companies twice a year. He was checked by a PAI auditor at random.	High Long-term relationship between inspector and regulated firm is avoided by a PAI auditor at random, i.e. a witnessed inspection, to satisfy PAI audit requirements.

Table 5.16 Results regarding the degree of street level bureaucrats' perceptions of communal moral norms (United Kingdom)

Operational indicator	Results	Score
<i>Degree of street level bureaucrats' perception of communal moral norms</i>	He was the only inspector.	n. d. (not determinable)

Personal background

▪ Professional knowledge and training

In order to establish the degree of inspector's professional knowledge and training, it was asked to indicate his highest school achievement, which knowledge he needs for accomplishing his task and whether he thinks his studies are suitable for his actual work. Finally, it was asked to specify

whether he attends any course or training programme concerning the issues of official controls in PDO product in general, and specifically about the production chain of Stilton.

He stated that he has a Distinction in Dairy Technology Course at Cheshire School of Agriculture, which included a six-month secondment to a cheese making creamery. This course is no longer available, but a new 3-year Dairy Technology course has been started.

Regarding the knowledge, he has a recognised qualification in Dairy Technology together with experience of practical cheese manufacture and product evaluation. He thinks his school achievement is suitable for accomplishing his task.

He did not attend any course or training programme concerning the issues of official controls in PDO product and any questions are directed to the Food Manager of PAI.

However, he had spent 25 years as Manager of cheese production sites. Manufacture of English Territorial varieties and Traditional English Cheddar cheese. In the specific case of knowledge and experience in Stilton production chain, he had spent 11 Years as Manager of 3 Stilton production sites.

Table 5.17 Results regarding the degree of school achievement/working experience and attended training programme (United Kingdom)

Operational indicator	Results	Score
<i>Degree of school achievement and attended training programme</i>	The inspector has a Distinction in Dairy Technology Course. He has a recognised qualification in Dairy Technology together with experience of practical cheese manufacture and product evaluation. He had spent 25 years as Manager of cheese production sites. Manufacture of English Territorial varieties and Traditional English Cheddar cheese. In the specific case of Stilton, he had spent 11 years as Manager of 3 Stilton production sites.	Medium The inspector has an appropriate background in the field of controls due to school achievement and working experience, even though he did not follow specific course or training programme concerning PDO products.

▪ **Individual moral norms**

The inspector’s individual moral norms were examined by asking to the inspector what is expected of him on the job and what is his idea regarding the importance of being certifier of PDO products (how important/meaningful he thinks is his job).

The inspector affirms he was asked to carry out a formal audit, in that he had a brief introduction with the producer, he carried out any checks on records of milk intake and process records (at random). Moreover, he looked at product at all stages of maturing and checked final product ready for sale. Finally, he concluded the inspection activity with the final “signing off” meeting, as required.

About the importance of being certifier of PDO products, he states he had access to confidential information and had a Confidentiality Agreement with PAI. He believes the Inspector/Certifier must be completely impartial and acceptable by the producer group to have access to confidential information.

Table 5.18 Results regarding degree of street level bureaucrat’s perception of the meaningfulness of his work (United Kingdom)

Operational indicator	Results	Score
<i>Degree of street level bureaucrat’s perception of the meaningfulness of his work</i>	The inspector believes the Inspector/Certifier must be completely impartial and acceptable by the producer group to have access to confidential information.	High He is aware of the importance of his role as certifier who aims at guaranteeing the PDO quality.

5.3.2 Result of expert’s evaluation

The Control Plan for Stilton cheese is generally coherent with the requirements listed in the Specification. The percentage of 48 of fat in the dry matter is the only analysis performed by the inspector, who has to prepare samples for issue to Laboratory for testing. This is due to the fact that the Specification is really generic and there are no particular restrictions. Other characteristics related to the raw material, production process and final product are only checked through documents and in-house findings.

Here below some examples showing how the general description of the Specification results in some few controls for the quality of the Stilton cheese:

RAW MATERIAL

1. The raw material is controlled only through documents of self-control activities (supply contract; delivery documents; certificates). It is also not specified the frequency of the controls carried out by the inspector
2. The use of resazurin as a method for testing the hygienic condition of the milk is old. There is no reason to still use it, it is not used anymore in Europe and it is not more restrictive than the conventional method.
3. It is not specified whether there is a control of the protein content of the milk. If it is actually not controlled, it lacks of this.
4. It is not specified whether the controls are done on the milk of each supplier or in the whole milk used in the production. If the inspection regards just the whole milk used, then

it is obvious that for the example the concentration of antibiotics will be diluted and there will never be any non-compliance detected.

PRODUCTION PROCESS

There are no requirements to be actually checked. The description of the product properties and of the production process in the Specification are quite general, there are no restrictions. For example:

1. The milk must be pumped into stainless steel vats, but these vats are free in type and dimensions. As usually the vats are made with stainless steel, what can be checked then?
2. The following ingredients are added in proportions and at the timing determined by the cheese-maker: a) starter culture; b) rennet; c) penicillin spores. However, their composition is free. → what can be checked then by PAI?
3. Curds can be cut either by hand or automatically to release whey. → what can be checked?
4. It is required to the inspector to ask to the cheese-maker information about the use of Calcium chloride as a processing aid. However the specification does not say anything about it. → how is this information used?
5. Within 12 to 24 hours from cutting, the curds are milled to a size directed by the cheese-maker and salted to a concentration specified by the cheese-maker. → which communal controls can be done?
6. During the period the curds settle and drain in the moulds, the temperature and humidity must be controlled within limits established by the producer. → which communal controls can be done?
7. The moulds must be turned regularly about the horizontal axis for a period determined by the producer such that the mould spends an approximately equal time resting on each end. → which controls can be done?
8. Cheeses are stored at a temperature and humidity defined by the cheese-maker. → which communal controls can be done?
9. The piercing technique is free. → which controls can be done?
10. Cheeses are pierced a second time in the same manner after a period determined by the producer. → which controls can be done?
11. Cheeses are stored at a controlled temperature and humidity within tolerances defined by the producer in order to mature. → which controls can be done?

FINAL PRODUCT

The Cheeses regarded as ready for consumption shall exhibit the following characteristics:

- A clean subtle flavour.
- A minimum of 48% milk fat in the dry matter.
- A maximum of 42% of water calculated on the total weight of the cheese.
- A uniform creamy white interior except for blue/green mould radiating from the centre with a velvety or flaky open texture free from gas holes and chalkiness
- A slightly wrinkled crust or coat on the outside with a variable colour.
- Absence of mite

Only the minimum of 48% milk fat in the dry matter is directly checked by the inspector. In relation to the other characteristics, the PAI assessor review only confirms in-house findings and check-internal records.

The amount of salt in the final product is not specified. However, this parameter, together with the percentage of humidity, should be seriously considered, as it influences the yield, the consistency of the cheese, the development of the aroma compounds and it also concern the healthy issue.

All these controls can be carried out, but they are quite general as a result of general provisions explained in the Specification. All the inspection points of the checklist could be certainly reduced in number.

However, the main problem is not in the way the inspector performs the controls, but it is in what the European Union has recognized by approving the Specification with general descriptions.

It can be affirmed that **the Control Plan for Stilton is generally coherent with the requirements listed in the Specification. The negative aspects are that there is no specifications about the frequency of the controls nor it is specified how to handle any detection of non-conformity with the requirements.**

Table 5.19 Results regarding degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the specification (United Kingdom)

Operational indicator	Results	Score
<i>Degree of which the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification and their frequency is established</i>	The control plan for Stilton is generally coherent with the requirements listed in the Specification. However, it is not specified the frequency of the controls.	Medium All the product characteristics listed in the Specification are taken into account for building up the activities established in the Control Plan, but the frequency of the controls is not specified.

5.3.3 Street-level bureaucrat' s performance

In order to assess the degree of assurance of PDO characteristics, four different aspects were taken into account: the amount of product features listed in the Specification and which are taken into account in the Control Plan, the frequency of the controls, the feasibility of the control activities and of the corrective actions according to the inspectors' perception and to the expert's evaluation.

As said before, the expert in the field of dairy product and PDO legislation stated that the Specification of the Stilton PDO cheese is not really specific and precise for this product, it is quite general to be actually able to measure something, and thus it is understandable that all the product characteristics which are described are actually considered in the activities set up in the Control Plan. Moreover, the street level bureaucrat indicated that the inspections he needed to perform are practicable. No answers related to the treatment of the situations of non-conformity were given. Therefore, these considerations lead to consider high the level of performance of the inspector in accomplishing his task, that is the assurance of the PDO product characteristics established in the Specification.

Table 5.20 Results regarding the degree of assurance of PDO characteristics established in the Specification (United Kingdom)

Operational indicator	Results	Score
<i>Degree of assurance of PDO characteristics</i>	<p><u>Inspector</u>: the inspections they need to perform are practicable</p> <p><u>Expert</u>: the Control Plan for Stilton is generally coherent with the requirements listed in the Specification, but it is not specified the frequency of the controls, as well as how to handle any detection of non-conformity. (Whether the treatment of any situation of non-conformity with the requirements is implemented cannot be then determined).</p>	<p>Low</p> <p>Product characteristics established in the Specification are not guaranteed due to the lack of more than two of the following aspects:</p> <ul style="list-style-type: none"> - the inspection activities set up cover all the product characteristics listed in the Specification (OK[°]) - the street level bureaucrats implement all the control activities (OK) with an established frequency (NO[~]) - it is clearly* specified how to handle any detection of non-conformity with the requirements (NO) - the treatment of any situation of non-conformity with the requirements is implemented (n. d. Not determinable → NO)

[°]OK: the condition is satisfied

[~]NO: the condition is not satisfied

5.3 Horizontal alignment

The comparison of the street level bureaucrats' performances of two countries may lead to understand different degrees of assurance of PDO product characteristics and thus to trace the origin of the factors influencing different outcomes.

When considering the similar products belonging to different countries, the Specifications should contain equal product description and in turn, the Control Plans, which are developed on the basis of the characteristics mentioned on the Specification, should include equivalent verification procedures. Therefore, the street level bureaucrats should perform the same behaviour when they interpret and deal with the translated EU guidelines.

The comparison of the street level bureaucrats' performances in the assurance of the two different cheeses Gorgonzola and Stilton allows to establish low level of horizontal alignment between the European Countries where the cheeses are produced, that are Italy and United Kingdom. In fact, taking into account the results from the analysis of each context, differences were found in more than two of the following aspects:

1. the inspection activities set up in the Control Plan cover all the product characteristics listed in the Specification
2. the street level bureaucrats implement all the inspection activities with an established frequency
3. it is clearly* specified how to handle any detection of non-conformity with the requirements
4. the treatment of any situation of non-conformity with the requirements is implemented

*Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

Table 5.21 Operational indicator for the degree of horizontal alignment between Italy and United Kingdom

Operational indicator	Results	Score
<i>Degree of horizontal alignment</i>	The inspection activities of both of Control Plans cover all the product characteristics listed in the Specifications and they can be fully implemented by the street level bureaucrats BUT they have differences on the establishment of the frequency of the controls, on how to handle any detection of non-conformity and on the feasible implementation of the treatment of any situation of non-conformity.	<p>Low</p> <p>Differences between different countries in more than two of the following aspects:</p> <ul style="list-style-type: none"> - the inspection activities set up in the CP cover all the product characteristics listed in the Specification (OK°) - the street level bureaucrats implement all the inspection activities (OK) with an established frequency (NO~) - it is clearly* specified how to handle any detection of non-conformity with the requirements (NO) - the treatment of any situation of non-conformity with the requirements is implemented (n. d. Not determinable → NO)

*Clearly in the sense that there is no room for self-interpretation about the gravity of the detected non-conformity and no discretion about corrective actions to be taken.

°OK: horizontal alignment is found

~NO: horizontal alignment is not found

6 Bottlenecks and solutions

In this chapter, bottlenecks will be defined on the basis of the findings presented in the previous chapter “analysis and results”. The classification of the indicators in low, medium and high level has permitted to assess which factors may have an influence on the outcomes, that are the degree of street-level bureaucrats’ performances separately in Italy and in United Kingdom. At the end, also the degree of horizontal alignment between the two countries was established. These evaluations allow the identification of the possible causes affecting the control systems at the inspectors’ level and thus to draw suggestions for improvement.

6.1 Bottlenecks

In this section, bottlenecks will be discussed respectively for the Italian and English contexts and whether they lead misalignment in assurance of PDO quality between the two EU countries.

6.1.1 Italy

Looking back at the results obtained for each indicator, the following weak points in the assurance of PDO characteristics of the Gorgonzola cheese can be found.

Firstly, the documents and guidelines translating the EU rules seem to lack of clarity. However, it looks as if the lack of clarity does not refer to the way the Control Plan is set up. In fact, the inspectors did not complain about the ambiguity and the contradictory activities they are asked to perform. Instead, the perceived lack of clarity emerges from the interviews to the supervisors, who declared that the EU rules established to define the description of the protected products are quite general and this fact results in not detailed specifications. Also the expert, who evaluated the activities set up in the Control Plan, had this feeling. He did not find mismatch between the inspections settled by the certification company CSQA and the features described in the Specification. However, he also perceived the Specification not complete enough to specifically describe, and thus control, the PDO quality of the products. Thus, according to the information collected in Italy, it can be affirmed that the actual problem does not lie in the establishment of the control activities, but it has to be traced back to the EU definition of the requirements for writing the Specification.

Going into detail for the case of the Gorgonzola cheese, it appears that the activities of the Control Plan do not generally leave any misinterpretation. However, when asking to the inspectors how they know that what they see on the documents actually reflects what is happening in the reality, then the doubts came out. They do documental controls to the cattle farming, milk collectors, cheese-makers etc. They do not control whether the companies have an internal assurance & control system. They check the presence of the documents which are required by law. For example, for the milk producers, they are: a) cattle register; b) book of the milk; c) periodic analysis.

The milk collectors, as well as the cheese-makers, can collect both PDO milk and not PDO. They have to keep adequate documentation to make evidence about the separation of the two different milks. In case of mixed collections (PDO and not PDO), the inspectors will verify the capacity of each tank-truck and the congruity with the amount of milk which is collected by the companies. The same thing is checked at the cheese-makers' level (congruence between storage tank and what the truck has delivered). However, there was not reply when it was asked to them how they know that documents actually reflect what is actually going on along the production chain. Thus, the problem could concern on how much to trust the documentation which is provided to the inspectors and thus weak spots could be identified at the stages of cattle farming, milk collectors, cheese-makers etc. However, it has to be said that for example the cheese-makers which declare different milk suppliers compared to the ones actually used commit a fraud which configures also as a fiscal crime. These false declarations has been never found out so far by the certification company.

Secondly, in the Italian control system it appears that there isn't any monetary reward system which involves neither the inspectors nor their supervisors. However, the street-level bureaucrats did not complain about this aspect, as they get everything it is established at the beginning of their working relation with the certification company. Also, there isn't any complain on the side of the supervisors.

Finally, all supervisors agreed upon the fact that the inspectors should receive constant updating about the new legislation and they also should need the space to gather with colleagues and discuss about communal practices to be used. However, the inspectors did not perceive this need. Moreover, when asking to their supervisors about the communal implementation of the control

activities, they do not find any divergence among inspectors. Therefore, it seems that the two aspects regarding updating and space to gather with colleagues are not really weak points in the assurance of the quality of Gorgonzola cheese.

6.1.2 United Kingdom

Taking into account the data collected in the previous chapter, the following weak points in the assurance of PDO product characteristics of Blue Stilton cheese can be identified.

Firstly, the subjectivity of the inspection activities appears evident, as there is only one inspector checking all the companies involved in the production chain of Stilton. On the one hand this fact means that the inspector has a complete overview of the different contexts where the cheese is processed, but on the other hand he does not have any colleague, with whom he can share possible doubts regarding the best practices to be implemented in specific cases and exchange experiences. However, it must also be said that the amount of company to be inspected -six dairies- can be managed by just one person, and thus economic issues would come out in case of more inspectors for the verification controls. Moreover, the inspector admitted he was checked by a PAI auditor at random, i.e. a witnessed inspection, to satisfy PAI audit requirements, making him even more aware of what was actually doing for his work.

Secondly, also in the English control system it appears that there isn't any monetary reward system which involves the inspectors. However, the respondent did not complain about this aspect, as he is not a PAI's employee and he just joined up with the certification body for the assurance activities of some PDO cheeses, among which Stilton can be found.

Finally, something must be said about the clarity of the documents and guidelines translating the EU rules, as the expert's evaluation did not completely match with the inspector's view.

The front-line worker affirms that the activities established in the Control Plan are clear and they do not leave room for individual interpretation. The expert agrees on the general consistency of the Control Plan with the requirements listed in the Specification, but he also stated that many activities appear to be useless and they could be reduced in number. For example, there is not point to check the addition of starter culture, rennet and penicillium spores if the proportions and the timing are determined by the cheese-makers and thus there is not an uniform procedure to be

homogeneously implemented and controlled. Other items could be taken as similar examples (see the list in the session of expert's evaluation of the previous chapter). Moreover, the Control Plan lacks of delineation of frequency of the controls and of the procedures to follow in case a situation of non-conformity is detected. Finally, the Control Plan lacks in the definition of the conditions according to which the cheese-makers are allowed to import the milk from the area outside the defined region. In other words, it seems there are no clarifications on the item described in the Specification regarding the use of milk which originates from herds in defined neighbouring counties when shortage occurs and the normal source of supply cannot meet the producer's demand. All these issues could appear clear to the inspector, who has many years of experience in dairy products in general and in Stilton production specifically, but they do not appear in the Control Plan and thus there might be a different approach in case another person takes his work. In other words, the English system seems to lack of bureaucracy.

Therefore, it appears that there are problems regarding not only the quality of the Control Plan - no frequency of controls, no description of the procedures to follow in case of detection of non-conformity- but also in relation to what the European Union has recognized by approving the Specification with general descriptions. As for the Italian situation, the Specification is not complete enough to specifically describe, and thus control, the PDO quality of the products.

6.1.3 Horizontal Alignment

It is noticeable that in both countries the Specifications are general and they do not require any thorough inspection. The two outcomes of the control systems do not correspond with each other and they do not guarantee the alignment with the EU requirements. The problem could reside in the descriptions set up at the European level. Each PDO product has its specific needs and thus it is understandable that the European Union has laid down general rules which should be able to adapt to each PDO product. However, it is also comprehensible that the Reg. (EC) 510/2006 may be perceived as too general and thus it could leave room for self-interpretation not only in each country but also in each specific PDO production. Taking a practical example from the comparison of the Control Plans of the Gorgonzola and Stilton cheeses, the Italian document includes all the milk-farming in the inspection activities (more than 1,000), while the English text asks the inspector to control the origin of the raw material only through documents of self-control activities (supply contract; delivery documents; certificates) at the level of the cheese-makers.

The situation could be graphically represented by the following figure:

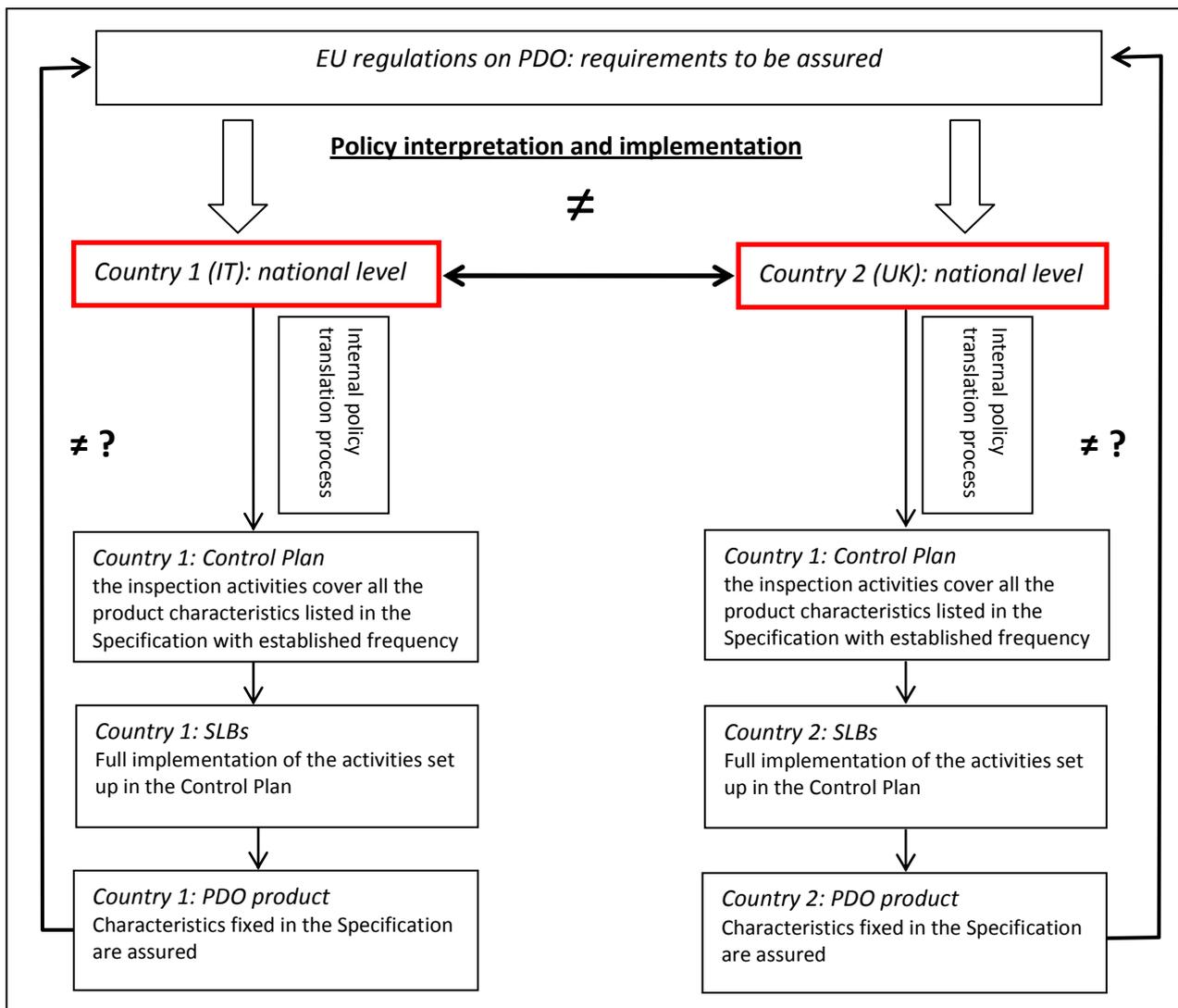


Figure 6.1 Horizontal misalignment at national level

The European Union sets up communal rules, which are eventually interpreted in different ways by each Member State. Once the rule is internalized in each country though, the national policy translation process occurs along the actors involved and it finally results in the level of performance in each control system. As the inspectors follow the activities established in the respective Control Plans, and the Control Plans differ from each others in terms of control activities to be performed and their frequency, the horizontal alignment is ultimately not established, at least as it was defined in this thesis.

The different interpretations of the European legislation at the national level lead to think also about the alignment between the quality of different PDO products with the European requirements. Low and high performances of the street level bureaucrats found in this work refer to the degree of assured PDO quality compared to the provisions in the Specifications but they do

not automatically lead to the establishment of the level of the vertical alignment with the EU requirements fixed with the regulations dealing with PDO products. In fact, if the European principles are differently interpreted by each country, then the Specifications differ and the two outcomes of assurance of PDO characteristics cannot be actually compared. The characteristics of the products are assured by implementing the activities set up in the Control Plans and taking the Specifications as benchmarks. However, there is not proof that those features which are controlled are specifically the parameters used by the European Union to protect those products. The inspection on the origin of the raw materials can be used as an example to clarify the abovementioned situation.

6.2 Suggestions

Three suggestions will be offered in the following paragraphs. They aim at guaranteeing an high final quality of the PDO products, which will be attained by means of an exhaustive compilation of the Specification and a full implementation of a complete Control Plan by the street level bureaucrats (“complete” in term of a) accordance between product characteristics and control activities to be performed, and b) their frequency). When these conditions are achieved, the quality will be uniformly assured in each EU Member State. Therefore, this fact would finally lead to an high degree of horizontal alignment between different Member States.

6.2.1 Suggestion 1

The European Union requires explanations on the link between the quality of the raw material, the region of production and the final product quality. However, according to the findings of this thesis, it appears that Specifications of similar products (belonging at the same EU category) describe these relationships in different manners, which leads to different control activities at the level of the Control Plans. In turn, different product characteristics are guaranteed.

For example, Italy, represented by the certification body CSQA, considers the geographical area one of the most important aspect of the PDO recognition, and thus the inspection activities start already at the milk-farming’s level and in no case milk can come from outside the boundaries accurately defined in the specification. Instead, United Kingdom, represented by the PAI, starts its inspections at cheese-maker’s level, by checking only the supply contract, delivery documents and certificates, and it does not perform any direct control to the milk-farming.

Moreover, the Specification of the Stilton allows the use of milk from herds in defined neighbouring counties when shortage occurs and the normal source of supply cannot meet the Producer's demand for milk, with milk that originates in the "three counties". Evidently, the English item refers to the article 2(3) of the Reg.(EC) 510/2006, which states that certain geographical designations shall be treated as designations of origin where the raw materials for the products concerned come from a geographical area larger than the processing area, provided that: (a) the production area of the raw materials is defined and (b) special conditions for the production of the raw materials exist; and (c) there are inspection arrangements to ensure that the conditions referred to in point (b) are adhered to. As a consequence, the English system is in line with the European legislation. However, no specific information is listed in the Specification and Control Plan in relation to the conditions in which the outsourcing is allowed. When it was asked to the inspector, no replies were provided.

The art. 5(3) of the Reg. (EC) 1898/2006, which lay down detailed rules of implementation of the Reg. (EC) 510/2006, states that "in respect of a product of animal origin designated as a designation of origin, detailed rules on the origin and quality of feed shall be included in the product Specification. Feed shall be sourced as far as practicable from within the defined geographical area". Neither the Specification of the Gorgonzola or of the Stilton put restrictions on the feed. However, in both descriptions it is indicated that certain climatic conditions existing in the defined geographical area and particular characteristics of the soil typify the grass which feed the cows, the milk gains some properties which confer distinctive taste to the cheeses.

The European Union could enhance the effectiveness of the controls by redefining the principles fixed in the Reg. (EC) 510/2006 and proposing an uniform approach to be followed in order to check those precise aspects it believes to be important. By means of this revision, it should appear unambiguous what is actually required by the European Union and how the controls should be implemented to guarantee the desired PDO quality. An uniform approach could be concretized by setting templates on product Specification and related control activities for each product class defined by the European Union (23 classes for PDO and PGI). If there is clarity in the objectives, goals and guidelines of the PDO legislation and in which properties and technological aspects of the product should be checked through inspection activity to achieve the level of quality that is demanded by the European Union, then Specifications of similar foodstuffs should ensure a certain uniformity in the delineation of the characteristics to be assured, the Control Plans could

be drawn accordingly and the inspectors could eventually guarantee the characteristics fixed in the Specification which are also aligned with the European requirements.

6.2.2 Suggestion 2

The Commission Decision 2007/71/EC of 20 December 2006 sets up a scientific group of experts for designations of origin, geographical indications and traditional specialties guaranteed. In the matter of PDO products, the article 2 “Term of reference” states that this group may be consulted by the Commission on any issue relating to:

- “compliance with the criteria laid down in Article 2 of Regulation (EC) No 510/2006 by a particular name for which an application for registration has been submitted, and in particular the link between the product and the geographical environment and/or its reputation”,
- “the generic nature of a name”,
- “the assessment of criteria regarding fair competition in commercial transactions and the risk of confusing consumers in cases of conflict between the designation of origin or geographical indication and designations of origin or geographical indications which are already registered, trademarks, names of plant varieties and animal breeds, homonyms, or names of existing products which are legally marketed”,
- “any other matter of particular interest having regard to the group's field of expertise”.

As it can be seen, this group of experts is consulted only on the matters concerned the recognition of PDO and not on the controls performed to guarantee their quality. It seems that they can give advice regarding the approval of Specification due to its alignment with the EU requirements but nothing is mentioned in relation to the inspections after the recognition of the product at European level.

The products with the designation of origin are subjected to the European requirements established in the Reg. (EC) 882/2004 regarding official controls to ensure the verification of compliance with feed and food law, animal health and animal welfare rules.

Every year the Commission establishes a general report on the overall operation of the official control systems in each Member State on the basis of the national reports and the results of the audits which it has carried out. It passes this report on to the European Parliament and the Council and publishes it.

The establishment of Control Plans allows the European control services to perform a general audit of the Member States' control systems globally. If needed, these inspections and national audits performed by the Commission's Food and Veterinary Office (FVO) can be supplemented by more specific audits and inspections for a particular sector or problem. For each control carried out, the Commission establishes a report on its findings and, where appropriate, this report contains recommendations which must be followed up by the Member States.

However, some remarks have to be made in relation to PDO foodstuff. It seems that this European system, as well as the FVO's inspections, is meant to check the alignment between the Specification, which is used as a benchmark, and the inspections performed to guarantee the quality listed in that document. They are not asked to think about the level of alignment between PDO quality assured by the activity the certification body and the PDO quality defined in the European Regulation (EC) 510/2006.

This situation leads to consider that probably the EU controls on the PDO products are not as effective as they may be on the other sectors controlled in accordance with the Reg. (EC) 882/2004.

When looking at the PDO segment, the European controls should aim at verifying the level of conformity between the principles established at European level and what it is actually assured by the inspection activities implemented by the certification bodies. Thus, doubts could come out not in relation to the level of performance of the street level bureaucrats in performing what is established in the Control Plan, but regarding the degree of match between characteristics checked and desired by the European Union by means of the PDO regulation. Therefore, the European controls in each Member State could involve the group of expert in the evaluation of the effectiveness of the inspections carried out for assuring that the quality guaranteed by the activities of the certification bodies is indeed the value asked by European Union to mark the products with PDO recognition.

6.2.3 Suggestion 3

The Reg. (EC) 510/2006, ruling PDO products, does not seem to set a uniform approach to the definition of the Specification and to the establishment of the inspection activities to be performed. In fact, the general principles are interpreted in different manners by each Member State. Also, the Reg. (EC) 882/2004 regarding official controls, does not include any specific procedure to be applied to PDO products. Thus, the combination of the two previous suggestions

could effectively improve the systems regarding PDO products both at national and European levels.

Considering the comparison of the control systems Gorgonzola and Stilton cheeses, the issue concerning the origin of the raw materials can be taken as an example. This item could be clarified by the European Union in the redefinition of the Reg. (EC) 510/2006, where the importance of this aspect could be better explained, so that the Specification and the consequent controls would adapt to the requirements established at the European level. The effectiveness of this arrangement could be eventually checked by the annual European inspections in combination with the expert's assistance and support.

6.3 Judgement of suggestions

In this section, the three suggestions previously presented will be judged on the basis of certain criteria so that the best proposal to tackle the European situation on PDO products will be defined.

6.3.1 Criteria

Criteria need to be defined in order to judge the proposed suggestions and determine the best solution.

The criteria should aim at assuring an uniform high level of PDO quality between different EU Member States, through the fulfilment of an exhaustive compilation of the Specification and a full implementation of a complete Control Plan by the street level bureaucrats ("complete" in term of a) accordance between product characteristics and control activities to be performed, and b) their frequency). When these conditions are achieved, the quality desired by European Union when establishing the principles in the Reg. (EC) 510/2006 will be guaranteed. This fact would finally lead to an high degree of horizontal alignment between different EU Member States.

Therefore, the best solution should satisfy the following criteria:

- a) full compliance of the Specification with all the principles defined in the Reg. (EC) 510/2006
- b) full compliance of the Control Plan with the product characteristics fixed in the Specification and the establishment of frequency of the inspection activities
- c) fully implementation of the activities established in the Control Plan
- d) high level of the final quality of PDO product, in term of compliance of the quality assured by the inspections with the quality desired by European Union in the Reg. (EC) 510/2006

6.3.2 Judgement

The suggestions will be judged on the basis of the previous criteria in order to determine the best solution.

Therefore, the judgment of each proposal will be presented in the table 6.1 to provide a clear overview. Argumentation about the decisions will follow.

Table 6.1 Judgment of suggestions based upon the criteria

Criteria	Suggestion 1	Suggestion 2	Suggestion 3
a)	+	+/-	+
b)	+	+	+
c)	+/-	+	+/-
d)	+	+/-	+

* + = good, ± = average and - = insufficient

Overall, it appears that only the full compliance of the Control Plan with the product characteristics fixed in the Specification (criterion b) is guaranteed by adopting all the three different suggestions. In fact, when changes will be made on the PDO legislation, precise guidelines should assure this aspect (suggestion 1 and 3). Similarly, in case that nothing is modified and only the European controls improve (suggestion 2), as this aspect was neither detected as bottleneck in the situation presented in this work.

The suggestion 1, which refers to the redefinition of the principles fixed in the PDO Regulation and the proposal of templates for each product class for guaranteeing an uniform approach, appears to be good in assuring a full compliance of the Specification with all the principles defined in the Reg. (EC) 510/2006 (criterion a) and a final product quality, in term of compliance between quality assured by the inspections and quality desired by European Union by means of the Reg. (EC) 510/2006 (criterion d).

However, problems may occur at the inspectors' level, as the activities established by means of European guidelines might be not applicable to all kind of actors involved in the production chain (i.e. due to different size of the companies or to extremely specific PDO product). The full implementation of the activities established in the Control Plan may not be achieved (criterion c) the procedures may need rearrangements.

The suggestion 2 regarding the involvement of the group of experts in the European evaluation of the effectiveness of the control systems in each Member State, is not good in guaranteeing a full

compliance of the Specification with all the principles defined in the Reg. (EC) 510/2006 (criterion a). This is due to the fact that the European controls conducted on the national systems may detect current divergences between assured and desired quality on the existing PDO products but the actors which will apply for the recognition of new products will still need to deal with the Reg. (EC) 510/2006, that lacks of clarity. For the same reason, the final product quality cannot be guaranteed for all -old and new- products (criterion d). However, as this suggestion does not require changes on the legislation, a full compliance of the Control Plan with the product characteristics fixed in the Specification will be guaranteed (criterion b), as it was revealed by the comparison presented in this thesis.

The suggestion 3, which requires the combination of the two previous suggestions, results to be good in the criteria a) and d) but it will not guarantee the full implementation of the activities established in the Control Plan (criterion c) due to the motivation provided in the argumentation of suggestion 1. Particular PDO product may need specific control activities which may not be included in the European templates.

Looking at the overall considerations, the suggestions 1 and 3 seem to be equally adapt to cope with the PDO problems. However, it must be said that the propose solutions are absolutely theoretical and they do not take into account the actual framework in which the European Union operates. At least other two criteria should be considered in the definition of the best proposal to improve the context of assurance of PDO quality, namely “low investment” (criterion e) and “easy to implement” (criterion f), which are shown in the table 6.2. By considering these two conditions, it can be comprehended whether the previous ideas for improving the controls on PDO product quality are indeed feasible and realistic.

Table 6.2 Judgment of suggestions based upon the criteria of “low investment” and “easy to implement

Criteria	Suggestion 1	Suggestion 2	Suggestion 3
a)	+	+/-	+
b)	+	+	+
c)	+/-	+	+/-
d)	+	+/-	+
e)	+/-	-	-
f)	+/-	+/-	-

The evaluation of the efficiency of the proposed solutions, in terms of investment costs, time for and feasibility of the implementation, cannot be accurately judged due to the inexperience of the researcher in this field in relation to economic arrangements of the European Union and all the potentials of the huge European machine.

However, it can be assumed that the most efficient suggestion for enhancing the final product quality regards the redefinition of the principles fixed in the PDO Regulation and the proposal of templates for each product class for guaranteeing an uniform approach (suggestion 1).

Instead, the solution 3, which required the combination of the revision of the reg. (EC) 510/2006 and the involvement of the group of experts in the European evaluation of the effectiveness of the control systems in each Member State, appears to be the most expensive. Moreover, it is judged the least achievable, at least in the short term. Solutions 2, which was already not considered the most suitable, seems to be also expensive and not really feasible.

Therefore, all these considerations lead to consider the suggestion 1 the most appropriate to assure an uniform high level of PDO quality between different EU Member States, which is achieved with high level of performance of the control system in each European country. By redefining the principles fixed in the Reg. (EC) 510/2006 and proposing an uniform approach to be followed in order to check those precise aspects it believes to be important, the control activities carried out by the inspectors of the certification bodies will guarantee an high final product quality in line with values desired by European Union when establishing the Reg. (EC) 510/2006. Eventually, this situation would bring to an high degree of horizontal alignment between different Member States.

7 Evaluation

This thesis aimed at understanding the factors influencing the implementation of the control system at street-level bureaucrats' level of the EU legislation on PDO products, and whether dissimilarities between performances of the front-line workers between different Countries lead to variations in the quality between PDO products of different EU Member States.

In order to investigate this focus, a techno-managerial approach was used to develop the research, which is characterized by four major parts, namely the appreciation phase (theory analysis), the analysis phase (analysis), the assessment phase (bottlenecks and solutions) and the evaluation phase.

At the end, an overall conclusion about the hypothesis formulated at the beginning of the research is given and recommendations for further research are presented.

7.1 Theory analysis

This thesis project started with a theory analysis on scientific literature in order to have an insight on the initial situation. Thus, this analysis appeared to be useful in outlining the framework in which the research would be developed.

The problem was analyzed by taking a techno-managerial approach, so that both perspectives were considered and the problem can be wholly explored and comprehended.

The literature and models used in this thesis were selected from available theories and methodologies. Since the research project was focused on a food quality problem, an elucidation on the underlying mechanisms in both behaviour of food (FB) and humans (HB) had to be gained, as shown in the food quality relationship: $FQ = f(FB, HB)$. Food behaviour is determined by food dynamics (FD) and technological conditions (TC), while human behaviour is determined by human dynamics (HD) and administrative conditions (AC). In the theory analysis, all the four elements were considered.

At the beginning of the research, the theory analysis was aimed at showing different aspects determining product quality. Explanations about the EU legislation regarding the registration of a product name at European level, Specification requirements and official controls followed. Then,

the managerial models came out. Firstly the hierarchical levels of the policy implementation were described, followed by the description of differences between vertical and horizontal alignment. A first general theory analysis had been used to narrow the problem feeling down into a problem definition, and to formulate hypothesis, research objective and research questions.

Consequently, a profound theory analysis was subdivided into four core elements, namely “quality concept in PDO product”, “certification systems”, “role of official certifiers” and “factors influencing implementation of the control system at the shop-floor level”. The distinction was made in order to answer to the research questions, which were made at the end of the appreciation phase. In fact, it appeared to be useful in bringing a logic and clear structure into the project. As a whole, it can be said that the theory analysis was mainly developed by taking a managerial approach due to the restriction presented in the problem definition. Difficulties have been found in integrating technological aspects.

It must be also mentioned the fact that this topic regarding official controls on PDO products is not well known in scientific literature, in the sense that not much has been written or published. Therefore, it was considered a bit difficult to investigate. The literature found was most of the time about public administration and it had to be adapted to this specific topic.

Nevertheless, the literature and models used in this thesis were selected by taking into account the criteria of relevancy, validity and reliability. These principles estimate the compatibility of the literature chosen with the focus of the project and the degree of its contribution in investigating the problem.

The relevancy refers to the availability in time and the comprehensibility of the selected models and literature. Both the technological and managerial models and literature chosen are characterized by this criterion, which made them useful for keeping the focus of the thesis and analysing the problem thoroughly.

The validity refers to the rightness and precision of the theory, so that it is possible to get a focussed and detailed research project. All the models and literature used in the theory analysis can be considered as valid, as they contribute to demarcate the general literature into more detail findings with an increase of validity and relevance.

The reliability refers to the reproducibility. The majority of the literature used was retrieved from scientific articles and official EU website, and thus a high level of reliability can be attributed to them.

7.2 Conceptual research model and indicators

The previous theory analysis lead to the development of a conceptual research model, which can be considered as reliable due to its basis on a profound literature review.

In the conceptual research model of this thesis, technological and managerial aspects can be recognised, even though the managerial part is predominant. This fact can be seen at the headings given to the four factors detected to have a possible influence on the implementation of the control system at the street level bureaucrats' level in each country, namely "legal framework", "organizational factors", "personal background", "quality of the Control Plan". However, the indicator for the managerial outcome, that is the performances of the street level bureaucrats, can be identified as technological, as it refers to the quality of the product itself.

Based upon the theoretical findings, operational indicators were identified for each element of the research model in order to evaluate them into practice. Consequently, levels classified as low-medium-high were determined for each operational indicator. Overall, the indicators can be considered to be relevant for their preciseness and reliable for their basis on literature analysis. However, it was difficult to determine the low and medium level for the "quality of the Control Plan", as the adjectives "some" and "many" referred to the amount of inspections which cover the product characteristics can be questionable. Moreover, it was not possible to determinate the medium level of the indicator referring to the presence of the organizational practices aimed at influencing the relation regulator/regulated firm. Some problems occurred in the definition of the levels for the street-level bureaucrats' performances and for the horizontal alignment between European countries, as no literature was found to precisely define these indicators. Nevertheless, during the analysis phase it appeared that those indicators were precise enough.

7.3 Research methodology and analysis

A case study has been realized in order to obtain data and validate the conceptual research model. Questions were formulated for each indicator, a questionnaire was developed and semi-constructed interviews were addressed to the actors involved in the control system of the cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and United Kingdom. They are both blue veined moulded cheeses but they belong to different countries and thus dissimilarities in the implementation of the control system at SLBs' level may be found, expressed in differences in product quality.

Also an expert in dairy sector and EU legislation was contacted to evaluate the control activities set up in both Italian and English Control Plans.

Some differences between the two countries were quite noticeable. The first dissimilarity regarded the numbers of inspectors involved in the certification activity, who were three in Italy and only one in United kingdom. This situation can be explained with the fact that the actors involved in the production chain of the Gorgonzola cheese are much more in number than the companies concerned with the Stilton. In addition to this, it is also to be said that the English Specification does not require the inspectors to control the milk-producers. Therefore, the English inspector needs to check only six cheese-producers.

The collected data were used to identify the bottlenecks. It has to be mentioned that the analysis which has been done results quite subjective, due to the research methodology used. The case study does not imply any statistical analysis to study the data. This lead to consider the determination of the levels for each indicator as a personal classification of the researcher. As a consequence, the subjectivity of the analysis made it difficult to draw strong conclusions.

Some remarks need to be made about the data collection. Looking at the Italian conditions, it was possible to go to the organization and interview some employees directly and indirectly involved in the certification of the Gorgonzola. Thus, any possible doubts that arose during the colloquia were immediately clarified by asking further questions to the respondents. Instead, the Italian inspectors were not present at the company and they were contacted via e-mail. When some answers needed some deeper details, they were contacted again but most of the time they did not reply. This caused some missing information, which was replaced by literature and documental research performed by the researcher. Considering the English context, some problems arouse. The control system for PDO products appeared different than the Italian structure. It was not possible to go to the company and make face-to-face interviews, therefore questionnaires were sent to the persons involved in the assurance of the PDO quality of Blue Stilton cheese. The questionnaires, which were already constructed for facilitating the interviews in the Italian company, were subjected to some modifications after it came to the knowledge that there is only one inspector dealing with Stilton cheese and he does not have any supervisor. Only the inspector filled in the questionnaire and sent it back. The reviewer of the work of the English front-line worker, who cannot be formally called supervisor but he also has responsibility in the inspector's decisions, did not fill it in. Moreover, when some elucidations were asked to have a

broader and more precise overview of the circumstances in which the inspector is working, no replies were provided.

This situation brought some difficulties in the comparison of the two contexts in relation to the organisational factors possibly affecting the street-level bureaucrats' performances. Some aspects could have been detected as relevant issues which have an actual influence on the outcome. Since the data regarding the organizational factors were not complete, it was hard to draw conclusions about this element. This fact has surely lead to some difficulties in the establishment of the degree of assurance of the PDO product characteristics.

7.4 Assessment

In the assessment phase, bottlenecks were defined on the basis of the findings presented in the previous analysis. As only a main problem was identified, the suggestions aimed at improving and making uniform the translation process of the European regulation from the European level to the National level. This fact would finally lead to establish an high horizontal alignment between different EU Member States. It must be said that the bottleneck concerns the comparison presented in this thesis, but probably other weak spots may have been detected in case of comparison of other similar products or other national control systems.

Consequently, three suggestions were presented. They were judged on the basis of diverse criteria in order to be able to eventually determine the best proposal to solve the bottleneck.

The solutions proposed in this thesis are considered as theoretical. The researcher had no insight in the framework in which the European Union finds itself to operate. For this reason, the term of "suggestion" was used instead of "solution". The proposed suggestions were only judged on theoretical criteria. Nevertheless, it was still quite hard to decide the most capable of solving the problem either at European and national levels.

Even though it was tried to combine both technological and managerial aspects, the proposals are considered mainly managerial solutions. This is probably due to the fact that the defined bottlenecks are more managerial-oriented.

7.5 Final conclusion

The aim of this research was to understand the factors influencing the implementation of the control system at street-level bureaucrats' level of the EU legislation on PDO products, and whether dissimilarities between performances of the front-line workers between different Countries lead to variations in the quality between PDO products of different EU Member States.

After a profound literature analysis, a conceptual research model was developed with the aim of showing and operationalizing the factors affecting the inspectors' performances in each national system and the horizontal alignment between different European countries. Indicators were prepared for each element.

The level of the Italian street level bureaucrats' performances resulted to be high, while the English outcome was identified as low. As a consequence, the low degree of horizontal alignment has been determined. In fact, if the European principles are differently interpreted by each country, then the Specifications differ and the two outcomes of assurance of PDO characteristics cannot be actually compared for achieving the horizontal alignment.

The hypothesis formulated at the beginning of the research stated:

"If dissimilarities exist in:

- 1) national interpretations of the EU disposition regarding PDO products,
- 2) inspection activities set up in the Control Plans and
- 3) implementation of control systems at street-level bureaucrats' level

among different EU Member States,

then there will be variation in the performances of the front-line workers between different Countries, expressed in a state of non-uniformity of quality between PDO products."

At the end of this work, it can be affirmed that the hypothesis is accepted, even though a complex situation was detected. The state of non-uniformity of quality between PDO products has been identified, as the high Italian performance was not in line with the low performance of the English inspector, according to the indicators defined in the research model.

However, even though the Italian outcome has been considered as high, it does not automatically lead to the high alignment with the EU requirements regarding the quality of PDO products fixed in the Reg. (EC) 519/2006, as the whole work did not consider dissimilarities in the Specifications, which must be recognized by the European Union in order to obtain the recognition of the PDO product and thus they were considered matters of fact.

7.6 Recommendations

This work was aimed at understanding the factors influencing the implementation of the control system at street-level bureaucrats' level of the EU legislation on PDO products, and whether dissimilarities between performances of the front-line workers between different Countries lead to variations in the quality between PDO products of different EU Member States.

Based upon the results and the evaluation, some aspects and recommendations for the future research can be made:

- the inclusion of a EU Member State of the East Europe in a further comparison may allow to detect additional divergences. In fact the comparison of the thesis regarded Italy and United Kingdom, thus one Mediterranean and one Northern Europe country. They traditionally have different habits and customs, which may also be the result in different interpretation of the European legislation.
- the knowledge of the actual organization of the European Union and the consideration of its economic disposal will be important aspects to take into account to draw more useful suggestions.

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Appendixes

Appendix 1. Presentation letter for the certification bodies

Dear CSQA/PAI group,

I am Sara Pasin, a 24 years old Italian student studying at the Wageningen University. I am working on my thesis for the Master “Food Quality Management” and I arrived at the stage of data collection to test my hypothesis.

My thesis focuses on understanding the factors influencing the implementation of the control system at inspectors’ level of the EU legislation on PDO products, and whether dissimilarities between implemented control systems at street-level bureaucrats’ level lead to differences in the extrinsic product quality.

I would like to consider the two cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and in United Kingdom, to gather data and to assess my hypothesis.

Therefore, I need your help for this study. I would like to have the possibility to send a questionnaire to some of your inspectors, their supervisors and possibly the manager too. I will ask them to give their opinions about a range of subjects in order to analyse the situation. The questions deal with their experiences and knowledge about the daily practices in accomplishing their tasks of assuring quality of PDO products, and the conditions under which they function.

Their answers will be kept strictly confidential and they will be analysed exclusively by me at Wageningen University. The output and findings of the analysis will be included in my thesis report. At no time your responses to these questions will be shared with anyone.

Please, let me know whether you can give me a hand in this part of my thesis.

Many thanks in advance for the time you spent for reading this mail and for your possible cooperation.

If you have any questions, please contact me (sara.pasin@wur.nl).

Sincerely,

Sara Pasin, MSc Candidate
Wageningen University

Supervisors:
Dr. Geoffrey Hagelaar
Dr. Catriona Lakemond

Appendix 2. Presentation letter for the participant

Dear participant,

I am Sara Pasin, a 24 years old Italian student studying at the Wageningen University. I am working on my thesis for the Master “Food Quality Management” and I arrived at the stage of data collection to test my hypothesis.

My thesis focuses on understanding the factors influencing the implementation of the control system at inspectors’ level of the EU legislation on PDO products, and whether dissimilarities between implemented control systems at street-level bureaucrats’ level lead to differences in the extrinsic product quality.

I would like to consider the two cheeses Gorgonzola DOP and Blue Stilton PDO, respectively produced in Italy and in United Kingdom, to gather data and to assess my hypothesis.

I contacted your supervisor and he gave me the possibility of sending the questionnaire to you. Hence, I ask for your help now. I will ask you to give your opinion about a range of subjects in order to analyze the situation. The questions deal with your experiences and knowledge about the daily practices in accomplishing your task of assuring quality of PDO products, and the conditions under which you function.

Your answers will be kept strictly confidential and they will be analysed exclusively by me at Wageningen University.

The output and findings of the analysis will be included in my thesis report. At no time your responses to these questions will be shared with anyone.

Many thanks in advance for your cooperation. If you have any questions, please contact me (sara.pasin@wur.nl).

Sincerely,

Sara Pasin, MSc Candidate
Wageningen University

Supervisors:
Dr. Geoffrey Hagelaar
Dr. Catriona Lakemond

Appendix 3. Questionnaire for the inspectors

Legal framework

▪ **Clarity of the documents and guidelines translating the EU rules**

As far as I know, the Control Plan is based upon a list of European and English rules and documents.

1. Do you know them?
2. Do you practically use them? Which ones? And Why?
3. Overall, do you feel the documents and guidelines to be followed are unambiguous? (Control Plan and abovementioned documents)
4. Do you feel the documents and guidelines to be followed are non-contradictory? (Control Plan and abovementioned documents)

Characteristics of the Control Plan

1. In relation to Stilton, at what extent do you think the inspection procedures established in the Control Plan are implemented?
2. In relation to Stilton, at what extent do you think the corrective actions established in the Control Plan in case of non-conformity are implemented?
3. How about your own experiences? Do you encounter any problem due to the non-feasibility of some inspection procedures?

Organizational factors

▪ **Supervisors' leadership behaviour**

1. Do you feel your supervisor encourages the employees in gathering with colleagues?
2. Could you give me concrete examples which show this supervisors' behaviour?
3. Do you feel your supervisor encourages the employees in participating and reflecting on the best practices to be communally implemented?
4. Could you give me concrete examples which show this supervisors' behaviour?

▪ **Organizational and supervisors' support**

A.

1. How much time do you need to do your job well? (time for inspecting farms and dairies)
2. Do you feel you have the time you need to do your job well?
3. What do you need to do your job well? (tools and equipments, car etc)
4. Do you feel you have all you need to do your job well?
5. Which kind of training do you receive to do your job well?
6. Do you feel you receive the training you need to do your job well?
7. Do you feel you have the space to gather with colleagues and reflect on practice?

B.

1. Does the reward system exist within the organization your are working for?
2. Do you know which are the standards used for evaluating your performance? If, yes, please tell me which they are.

3. If present, are you satisfied with the methods used for appraising your performance? In what sense you feel satisfied with them? (correctness/fairness -getting incentives and promotions according to your results and efforts- etc)

C.

1. Do you inspect the same regulated firm of production chain of Stilton every year?
2. As an inspector, you report the results of your inspection activity. Once you bring the information, what happens within your organisation to draw conclusion upon your findings? Please, explain me the steps of this procedure, how the tasks and the responsibilities are divided.

D.

1. Do you feel you all share the same awareness about the importance of your role as certifiers within the team of inspectors?
2. Could you give me concrete examples you use as signals which demonstrate this common consciousness?

Personal background

▪ **Professional knowledge and training**

1. What is your highest school achievement?
2. In which field did you achieve the previous degree?
3. Which knowledge do you need for accomplish your task?
4. Do you think your school achievement is suitable for accomplishing your task?
5. Did you attend any course or training programme concerning the issues of official controls in PDO product?
6. And specifically about the production chain of Stilton?

▪ **Individual moral norms**

1. Could you tell me what is expected of you on the job?
 2. What is your idea regarding the importance of being certifier of PDO products? (how important/meaningful do you think is your job)
-

Appendix 4. Questionnaire for the supervisors

Legal framework

▪ Clarity of the documents and guidelines translating the EU rules

As far as I know, the Control Plan is based upon a list of European and English documents.

1. Do you know them?
2. Which ones do you practically use? And Why?
3. Overall, do you feel the documents and guidelines to be followed are unambiguous? (Control Plan and abovementioned documents)
4. Do you feel the documents and guidelines to be followed are non-contradictory? (Control Plan and abovementioned documents)

Characteristics of the Control Plan

1. In relation to Stilton, at what extent do you think the inspection procedures established in the Control Plan are implemented?
2. In relation to Stilton, at what extent do you think the corrective actions established in the Control Plan in case of non-conformity are implemented?
3. How about your own experiences? Do you encounter any problem due to the non-feasibility of some inspection procedures/corrective actions?

Organizational factors

▪ Organizational and supervisors' support

A.

(they provide to street level bureaucrats)

1. How much time do you think they need to do their job well? (time for inspecting farms and dairies)
2. Do you feel they have the time they need to do they job well?
3. What do they need to do their job well? (tools and equipments, car etc)
4. Do you feel they have all they need to do their job well?
5. Which kind of training do they receive to do their job well?
6. Do you feel they receive the training they need to do their job well?
7. Do you feel they have the space to gather with colleagues and reflect on practices?

(they receive)

1. How much time do you need to do your job well?
2. Do you feel you have the time you need to do your job well?
3. What do you need to do your job well?
4. Do you feel you have all you need to do your job well?
5. Which kind of training do you receive to do your job well?
6. Do you feel you receive the training you need to do your job well?
7. Do you feel you have the space to gather with colleagues and reflect on practice?

B.

1. Does the reward system exist within the organization you are working for?
2. Do you know which are the standards used for evaluating your performance? If, yes, please tell me which they are.
3. If present, are you satisfied with the methods used for appraising your performance? In what sense you feel satisfied with them? (correctness/fairness -getting incentives and promotions according to your results and efforts- etc)

C.

1. Do you check whether street level bureaucrats inspect the same regulated firm of production chain of Stilton every year?
2. As a supervisor, what are the aspects you consider when dealing with the information you receive with inspectors' reports? Could you tell me what happens within your organisation once you bring the information? Please, explain me the steps of this procedures, how the tasks and the responsibilities are divided.

D.

1. Do you feel you all share the same awareness about the importance of your role as certifiers within the team of inspectors?
2. Could you give me concrete examples you use as signals which demonstrate this common consciousness?

E.

1. Could you tell me what do you expect from the inspectors on the job?
2. As their supervisor, what do you do in order to promote consistency in the interpretation of the rules among inspectors?
3. What do you do in order to emphasize how important is the role of certifiers of PDO products within the team of inspectors?

Personal background

▪ **Professional knowledge and training**

1. What is your highest school achievement?
2. In which field did you achieve the previous degree?
3. Which knowledge do you need for accomplish your task?
4. Do you think your school achievement is suitable for accomplishing your task?
5. Did you attend any course or training programme concerning the issues of official controls in PDO product?
6. And specifically about the production chain of Stilton?

▪ **Individual moral norms**

1. Could you tell me what is expected of you on the job?
2. What about your ideas regarding the importance of being certifier of PDO products? (how important/meaningful do you think is your job)