

Input legitimacy of bottom-up fishery governance: Lessons from community-led local development in two Nordic EU countries

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Abstract

In European Union member states, the community-led local development (CLLD) approach implemented through Fisheries Local Action Groups (FLAGs) represents different social organisational and democratic traditions. Hence, FLAGs operate and apply local development strategies and strengthen the role of fishing communities and the fishing industry under the influence of nationally contingent factors. Based on document analysis and mixed methods data, this article addresses the role of input legitimacy in FLAGs in Denmark and Finland. The findings show that Danish FLAGs demonstrate input legitimacy, while the fishery sector's interests are relatively weakly represented on FLAG boards. In Finland, the FLAG institutional system is perceived to be more flexible, demonstrating a lower level of input legitimacy, while the fishery sector's interests are substantially represented on FLAG boards. The comparison provides an analytical basis for member states financing CLLD through EMFAF and paves the way for reflexion on the FLAG governance system based on different programming periods and institutional contexts.

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KEYWORDS

CLLD, fisheries, FLAG, governance, input legitimacy, neo-endogenous

INTRODUCTION

Easton's (1965) classical model of the political system illustrates that both 'input to' and 'output from' the political process are important aspects that affect citizens' views on institutional legitimacy. In this article, we investigate the input aspect through a study of the input legitimacy of Danish and Finnish Fisheries Local Action Groups (FLAGs), which we approach as key neo-endogenous actors in coastal areas. The article uses Scharpf's (1999, 2003) conceptualisation of input legitimacy and therefore draws attention towards the channels of access and control that contribute to the FLAG decision-making board's responsiveness to the interests of people in the FLAG area. The findings are situated in relation to neo-endogenous rural development research while focusing on institutions rather than merely abstract structures or individuals. Institutions are more stable than individuals but less firm than structures and can therefore provide important insights into political processes.

In 2007, the territorial approach to rural development, as represented by the LEADER program since 1990, was mainstreamed and extended into new policy areas that made it possible to establish FLAGs across the European Union (EU), funded by the European Fisheries Fund (EFF). As with rural local action groups (LAGs), the rationale of FLAGs is that they can enrich and anchor the multilevel governance of fishery policies. FLAGs are expected to emphasise legitimate democratic bottom-up development and establish well-run partnerships that include a secretariat leveraging networks and social capital creation and to thereby improve governance and innovation in the community-led local development (CLLD) of fisheries areas (Thuesen & Nielsen, 2014).

De Rubertis (2019) and Müller et al. (2020) recently emphasised that CLLD is the most prominent unifying support scheme following the neo-endogenous approach. Research on the neo-endogenous development approach in rural communities (Bosworth et al., 2016; Gkartziros & Lowe, 2019; Ray, 2006) has drawn attention to bottom-up participation in and access to cross-sectoral partnerships (Navarro et al., 2015; Thuesen, 2010, 2011), and this research has included a focus on the participation of farmers (Konečný et al., 2021) and statutory/public sector partners (Furmankiewicz & Macken-Walsh, 2016) in rural LAGs. The accomplishments and contributions of FLAGs in connecting such sector-based and territorial interests have nevertheless remained somewhat under-investigated as noted in this special issue (see also Leite & Pita, 2016; Linke & Bruckmeier, 2015). However, Jentoft (2000) emphasised how sector-based resistance from groups of fisheries has implications for legitimacy in different types of multilevel co-governance models. Therefore, since FLAGs are intended to contribute to the diversification of the fishery sector, our investigation concerns input legitimacy in relation to general civic involvement and the inclusion of the fishery sector specifically.

Through a comparative analysis of the input legitimacy and civic involvement of FLAGs in Denmark and Finland during the 2014–2020 programming period and in the transition phase leading into the 2021–2027 programming period, we contribute to knowledge transfer among varying institutional contexts and programming periods. Exploring the input legitimacy of FLAGs raises several questions: How are people's preferences made clear? How can people access FLAG partnerships and influence decisions? How are people's voices and interests heard? How can people

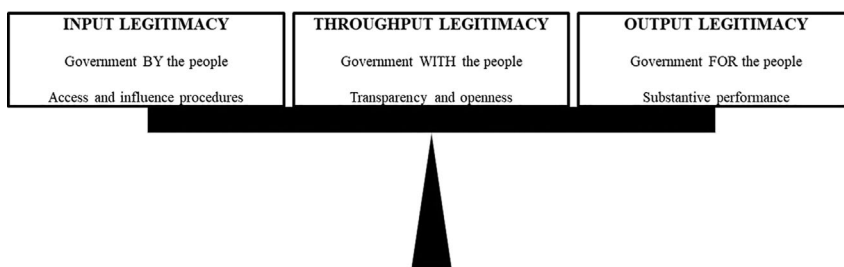


FIGURE 1 The balance among input, throughput and output legitimacy.

hold FLAG partnerships accountable? To what extent are fisheries' interests represented on FLAG boards? These basic legitimacy issues lead us to examine the following questions:

How do Danish and Finnish FLAGs enable input legitimacy for locals to take the lead and in terms of including fisheries' interests? What lessons can be learnt for the future institutional design of FLAGs as promoters of neo-endogenous development?

First, we explain Scharpf's (1999, 2003) theoretical framework, followed by a methods section describing the case-study construction and document analysis method. We then present the fisheries CLLD contexts in Denmark and Finland. The case studies are presented in the analysis section, and the article ends with a discussion and conclusion on what we have learned from FLAGs in Denmark and Finland regarding input legitimacy and the institutional design of neo-endogenous development.

LINKING INPUT LEGITIMACY TO THE BOTTOM-UP ASPECT OF NEO-ENDOGENOUS DEVELOPMENT

Our exploration of input legitimacy in relation to FLAGs is part of a larger discussion about the relationship between democracy and the efficiency of political institutions and whether some level of trade-off exists between these two dimensions. Scharpf contributed to this dialogue in relation to EU supranational institutions (Scharpf, 1999) when he 'grafted Easton's systems theory and its vocabulary on to the context of democratic theory' (Steffek, 2018, p. 785) by introducing the concepts of input and output legitimacy. Here, we want to contribute to these discussions by investigating a specific part of EU policy, namely, the FLAGs, positioned at the subnational and subregional levels.

Denters et al. (2014) identified Scharpf's concept of input and output legitimacy among a wider set of normative criteria for democracy that include *procedural* versus *substantive* dimensions, *citizen effectiveness* versus *system capacity* (Dahl & Tufte, 1973) and government *by* the people versus government *for* the people (Scharpf, 1999), see Figure 1.

We recognise that these criteria create intertwined concept pairs, but here, we limit ourselves to mainly examining Scharpf's input side in the form of 'government by the people' to look at how input legitimacy is practised in FLAGs in Denmark and Finland. Given our focus on input legitimacy, we include the procedural dimensions of throughput legitimacy highlighted by Schmidt (2013, p. 5) as 'the space between the political input and the policy output'. Studies of these legitimacy aspects in FLAGs are interesting and important, as they reveal the barriers and

opportunities that emerge when introducing an EU funding policy in different national and institutional contexts and in contexts where fisheries play different roles.

Phillipson and Symes (2015) underlined how England has struggled to build trust between the fishers and non-fishers who are supposed to co-operate in FLAG partnerships. These scholars stated that small-scale businesses have often been poorly organised and hard to mobilise (Phillipson & Symes, 2015); citing Shucksmith (2000, p. 208), they also emphasised that the involvement of fisheries and other stakeholders 'from the "far from homogenous" local community is vital for success and local legitimacy if the FLAGs are not simply to reinforce existing power relations and inequalities'. These findings underline the need to examine the procedures of civic involvement in FLAGs.

According to Scharpf, input legitimacy is concerned with 'institutional arrangements that are thought to ensure that governing processes are generally responsive to the manifest preferences of the governed' (Scharpf, 2003, p. 4). Decisions are legitimate if they represent the will of the people and if citizens can control the decisions made by politicians (Dahl & Tufte, 1973) and judge the competencies and performance of their leaders (Denters et al., 2014). Scharpf admits that such purely input-oriented legitimacy rests on demanding assumptions about harmony among the people and an orientation towards a common good among citizens and representatives. However, Migchelbrink and Van de Walle (2019) statistically demonstrated that input legitimacy, understood as public participation and representativeness, is important for judging the participation process. Thuesen (2011) studied input-oriented legitimacy in relation to LAGs operationalised as access and influence procedures and showed that these dimensions are expected to lead to that decisions are based on the voices and interests of the community at stake.

Theorists who have focused on throughput legitimacy (Schmidt, 2013; Zürn, 2000) have often demarcated throughput from input legitimacy and thereby reduced the space occupied by input legitimacy by limiting it to a highly representative and aggregative ideal of democracy involving bargaining and competition for votes. Steffek (2018), however, spoke about 'a severe problem of fuzzy borders' (Steffek, 2018, p. 784) and mentioned that 'clear borders are a problem with throughput legitimacy' (Steffek, 2018, p. 786). This division is rather blurry and must be assessed in relation to the empirical focus. Like Scharpf's theoretical approach, the theory of throughput legitimacy has been developed in relation to the EU. However, when the starting point is an anticipation of participatory democracy, as with LEADER/CLLD (Thuesen, 2015), input and throughput to some degree merge by virtue of the normative criteria that lie in participatory democracy. Part of the input of this normativity is thus similar to throughput; namely, it constitutes work processes that stem from norms and rules pertinent to the daily work of the FLAGs that relate to 'accountability, transparency, inclusiveness and openness' (Schmidt, 2013); Schmidt (2013, p. 5) saw these dimensions as 'governing with the people'. Steffek (2018, p. 784) postulated that it is the shift from government to governance that pushes forward the focus on throughput legitimacy because 'governance is procedure, and throughput legitimacy tells us what good procedures are'. We rarely hear about throughput legitimacy aspects when everything goes well; the term only comes to light when scandals, oppressive power and abuses occur (Schmidt, 2013, p. 18). In this article, we recognise the relevance of Schmidt's emphasis on throughput dimensions but follow Steffek (2018, p. 790), who concluded that throughput aspects can be discussed 'under the input heading'.

Boedeltje and Cornips (2004, p. 2) argued that governance networks, by bringing together different sectors in the solution to problems, can provide output legitimacy better than input legitimacy; thus, in relation to Figure 1, these networks risk tilting towards the right. Sørensen and Torfing (2005, p. 201), however, wrote:

Governance networks are not by definition ‘democratic’ or ‘undemocratic’. Everything depends on their actual form and functioning, which again depends on the historical and political context in which they emerge and operate.

The structure of the FLAG system in Denmark and Finland is important to investigate because these countries have attempted to counter the criticism that governance networks are undemocratic by dictating that LAGs and FLAGs must be organised as associations with elected boards and provide access and participation opportunities for ordinary local people. However, there are also important differences between Denmark’s and Finland’s use of the association model; these differences come to light when the analysis focuses on input legitimacy.

In particular, the bottom-up concept of CLLD leads back to the input-oriented emphasis on procedural legitimacy because of its focus on the involvement and mobilisation of citizens and fair processes. As stated on the website for the EU’s Fisheries and Aquaculture Monitoring, Evaluation and Local Support Network, ‘Under CLLD, local people take the reins and form a local partnership that designs and implements an integrated development strategy’ (FAMENET, 2022). We assume that if the theory of input legitimacy is operationalised *as access and influence* procedures and embraces people’s involvement and simultaneous *transparency and openness*, it could reveal possibilities for participation in Danish and Finnish FLAGs, both by general civil society and by the fisheries sector actors.

MATERIALS AND METHODS

A comparative case-study design is used to investigate two national units representing FLAGs in Denmark and Finland mainly during the 2014–2020 programming period; we also briefly address the different changes that have been implemented in both countries in 2022. By doing so, we show variations within and across national contexts and variations over time (Andersen et al., 2010). Similar to another Nordic study on Swedish and Finnish FLAGs (Salmi et al., 2022), our comparative approach allows us to highlight structures that are usually taken for granted and explore issues rarely addressed by single case studies. According to Jasanoff (2005), comparison can help explain heterogeneity among democracies in terms of policy implementation and enable us to learn from different experiences. In our study, the comparison elucidates specific characteristics of Danish and Finnish FLAGs stemming from different national implementation systems set up for FLAGs and the implications of these systems for legitimacy. Denmark and Finland are both high-trust countries, which may influence the organisational models chosen.

The primary data sources in the two case studies are the FLAGs’ local development strategies (LDSs) or applications for the 2014–2020 programming period, totalling 10 in each country. These documents are compiled by the FLAGs; they establish each FLAG’s long-term vision and operational regulations and portray how the preparatory strategy processes have evolved, including providing a description of who the central players have been and what their involvement has entailed. The documents were not written with the idea of using them in research; they followed standard requirements and approval procedures emanating from higher levels of governance (Bryman, 2012). Nevertheless, the documents are investigated to provide a ‘face value’ view of the FLAG system, including an assessment of input legitimacy. Thus, these materials were not developed in dialogue with the researcher and were instead created independently of the research. At the end of each case, we also describe the national changes that occurred between programming periods by incorporating the programming period 2023–2027.

As a validating supplement to the structured LDS content analysis, a combination of research methods was adopted, and these included the desk research analysis of secondary data. This desk research phase included the analysis of documents pertaining to previously collected data and earlier studies conducted by the authors of this article (Bugeja Said et al., 2022; Freeman & Svelds, 2022; Miret et al., 2020; Salmi & Svelds, 2022; Salmi et al., 2020, 2022; Thuesen & Nielsen, 2014; Thuesen & Sørensen, 2009). These past studies contained analyses of interview data with key multilevel governance actors, as well as an analysis of official acts and national operational European Maritime and Fisheries Fund (EMFF) and EMFAF programmes. Additionally, ministerial, EU and FLAG webpages were consulted for the purpose of this comparative study.

Supplemental telephone interviews and email correspondence were conducted to validate the governance situation across the programming periods and, in the Finnish case, to deepen the understanding of the 2021–2027 programming period FLAG directions.

FISHERIES CLLD IN DENMARK AND FINLAND

Denmark and Finland have implemented the FLAG approach promoted by the EU's maritime and fisheries programs since its introduction in 2007 through Axis 4 of the EFF and since 2014 as CLLD under Union Priority 4 of the EMFF. This took place at a time in which small-scale fisheries in Denmark and Finland were in decline (Nielsen et al., 2019; Setälä et al., 2022), and the fishery sector was experiencing economic and social challenges due to tightening regulations regarding areas where fishing was permitted (Pascual-Fernández et al., 2020). Studies on FLAGs have investigated how such groups are part of a shift in the focus of fisheries policy from a sectoral focus on biological and economic aspects of fisheries towards a territorial approach, including considerations of socioeconomic impacts on the territory (Symes & Phillipson, 2009; Symes et al., 2015), nurturing connections between the fishing sector and other actors of local development but with the 'danger that the interests of actors linked to fishing will be demoted by the interests of the new actors' (Piñeiro-Antelo et al., 2019). In Denmark, the national implementation of the FLAG scheme has followed such a territorial approach, and the programme has been implemented as a complementary aspect to other parts of the remaining sector-focused programme with 'no immediately obvious interfaces' (COWI, 2019, p. 9) with these other fisheries-related parts. The use of a territorial rather than sector-based approach is underlined by the fact that FLAGs are administered in the same ministry that manages the LAG scheme from the Rural Development Programme (RDP) away from the sector-based Ministry of Food, Agriculture and Fisheries of Denmark managing the remaining parts of the EU rural and fisheries/maritime programmes. A study analysing empirical fieldwork data from Denmark shows, however, how inhabitants and actors in coastal fishery areas fear becoming museum towns (Ounanian, 2019), where tourism becomes a substitute for the fishing industry. Finland, despite its fishing industry facing challenges, has been more focused on accentuating the 'F as in fisheries' for FLAGs and thereby focused on the 'middle way' expressed by Phillipson and Symes (2015) that integrates the complicated equilibrium between the territorial development of coastal areas and the promotion of fisheries' interests. This may have been favoured by the fact that the management of the Finnish FLAG scheme falls under the Ministry of Agriculture and Forestry, a sector-focused ministry.

An important aspect in the Danish implementation of CLLD in relation to input legitimacy—and to some extent in the Finnish implementation as well—is that FLAGs are often legally organised as associations. This builds on an associational tradition that dates to 19th-century rural civic movements (Klausen & Selle, 1995). This associational model involves written rules and a

membership system allowing ordinary people to be registered as members of the association and to participate in public annual general meetings where board members are *elected*; moreover, anyone can stand for election and be elected, thereby gaining access to and joining the board of the association (Balle-Petersen, 1976; Boye & Ibsen, 2006). The Danish integrated LAG Bornholms website is an example of how in the associational model, individuals are represented—often with a picture and a line explaining the person’s underlying socioeconomic sector attachment (see <https://lag-bornholm.dk/wp-content/uploads/2022/11/sammensaetning-af-bestyrelsen.pdf>). The ways in which FLAGs in Denmark and Finland are organised to ensure legitimacy are different from those in some other member states, where only official organisations can become partners, and this often happens through *appointments*. This is exemplified by the Scottish Argyll and Ayrshire FLAG organising model (Scottish Argyll and the Islands, 2015), where partner organisations are represented on the FLAG website with a link to the partner organisations websites (e.g., see <https://www.argyllandtheislandsleader.org.uk/flag-members-and-minutes>).

Denmark

Between 2007 and 2013, there were 16 FLAGs in Denmark, and between 2014 and 2020, there were 10 (see Figure 2). The reduction in the number of FLAGs was due to a 50% decrease in the overall number of fisheries and rural LAGs, which fell from 57 to 29. This happened due to the enlargement of LAG territories (from mainly including a single municipality to including several municipalities). Eleven out of the 16 Danish FLAGs from the 2007 to 2013 period were also LAGs, and the general reduction in the number of LAGs therefore affected the number of FLAGs. At the same time, an important reduction in the area covered by FLAGs with the aim of concentrating on the most peripheral coastal areas of Denmark, including on islands, was made.

Danish FLAGs foster the territorial development of coastal areas mainly by creating jobs, promoting innovation along the fisheries’ value chain, and supporting the diversification of the



FIGURE 2 Danish Fisheries Local Action Group (FLAG) areas 2014–2020.

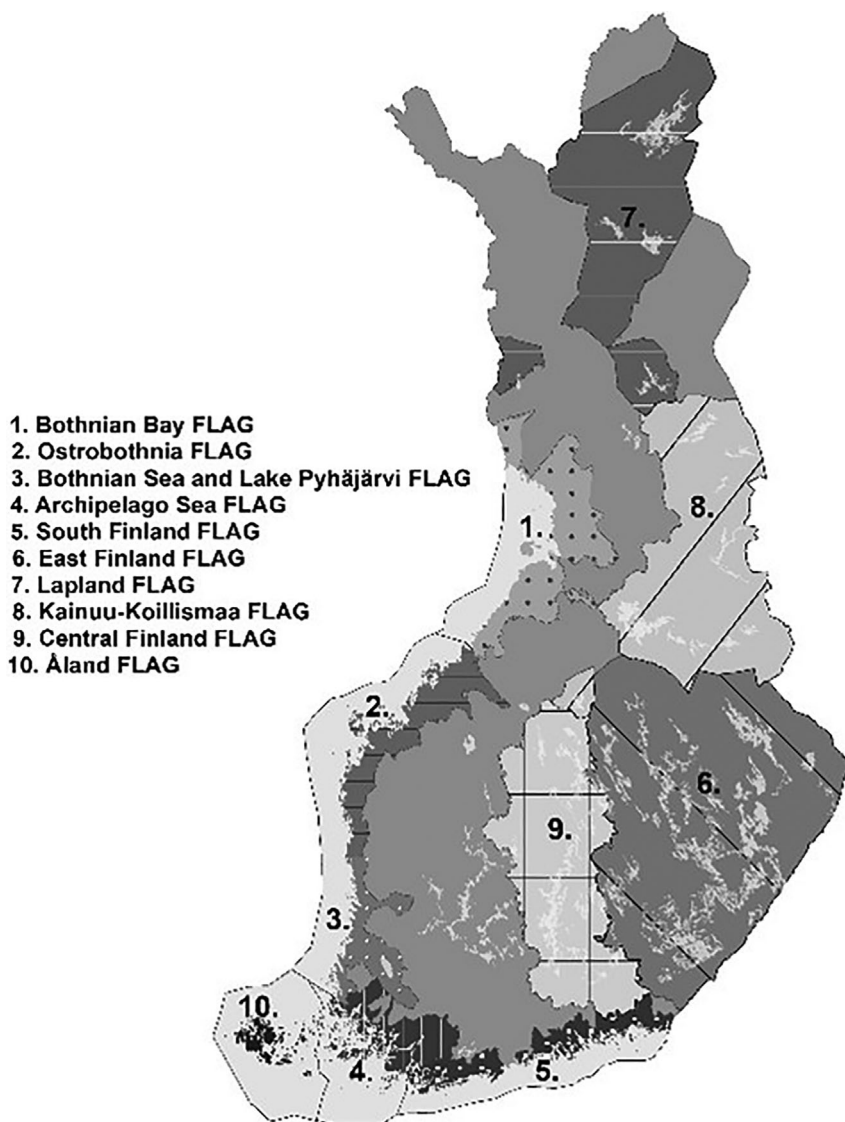


FIGURE 3 Finnish FLAG areas 2014–2020.

coastal economy (FARNET, 2017). Important project themes are adding value to fisheries' products, diversifying to include tourism, and developing new activities and products. The annual budgets devoted to FLAGs in Denmark in the study period amounted to approximately EUR 7.5 million and represented 6% of the total EMFF allocation for Denmark.

Finland

Finland initially established eight FLAGs during the 2007–2013 programming period and 10 in the 2014–2020 period (see Figure 3). The 10 Finnish FLAGs represented both coastal and inland fisheries, therefore indicating diverse sectoral differences and challenges.

The national goals for the Finnish FLAGs have been to develop the local fisheries' value chain, develop and disseminate new practices and innovations, reduce conflicts and improve collaboration and the popularity of local fish products (Ministry of Agriculture & Forestry, 2014). The projects supported have mostly concerned fish, the fishery sector, the effect of seals and cormorants on fishing opportunities, educational measures, and harbours and other facilities (Salmi et al., 2020). Of the total national EMFF funding in Finland during this period, 5% was used for FLAGs (8.1 milj EUR), and 11% of all Finnish project funding received from the EMFF between 2014 and 2019 was CLLD connected (Salmi et al., 2020).

Input legitimacy in the Danish and Finnish FLAG arrangements

EU regulations that provide a common starting point

Various EU regulations set out rules relevant to input legitimacy when implementing CLLD nationally and locally. The regulation (EC, 2013) states that sectors and interests must be represented, local needs must be considered and potential must be mobilised at the local level. Relevant sociocultural characteristics of the FLAG area should be considered, and the FLAG strategy must include a description of the processes for involving the local community. CLLD should be implemented through a locally rooted approach of local partnerships, which include representatives of the public, private and voluntary sectors, and civil society; it is considered that these actors are best positioned to determine local development needs and potential. No interest group may represent more than 49% of the votes within decision-making bodies. In addition, the regulations state that the participation of fisheries and aquaculture actors in the sustainable development of local areas should be increased (EC, 2014).

Case 1: Input legitimacy of Danish FLAGs (2014–2020)

National institutional design for access and influence procedures

In Denmark, the associations include a board and a membership base, which are implemented in the same way for Danish rural LAGs and FLAGs. People have access to and can influence decisions made by the general assembly (GA). This institutional design secures input legitimacy for the general population. The FLAGs must stay relevant for and attractive to their members as well as keep track of membership, as only association members can vote in the GA. Board members are elected for 2 years, and everyone who is 18 years old and living in the territory can run for election. The participants in the GA also elect the chairman of the board of directors, thereby granting great power to ordinary members to influence the outcome. Only a few public authority board members, namely, representatives of municipalities/regions, are appointed by their institutions (Thuesen & Sørensen, 2009).

The national institutional design dictates that the FLAG and LAG association boards must be:

able to represent the interests of rural areas and fisheries, depending on the activities of the action group for the following four socioeconomic groups: local citizens, local enterprises, professional organisations, and trade unions, including in the field of fisheries and/or aquaculture, local nature, environment, culture, civic and leisure associations and public authorities. (FVM, 2015)

The creation of ‘local citizen’ groups is an attempt to better anchor the work of the FLAG association in the general local population by allowing individuals to stand for election even when they are not comfortable representing one of the specified public, voluntary or business groups. In general, FLAGs are subordinated to the LAG rule arrangement since the same rules apply to both LAGs and FLAGs. However, in the case of FLAGs, the start of the programme has been delayed. Denmark thus seems to have implemented CLLD on a ‘first LAG, then FLAG basis’. Generally, FLAG boards include a total of five to 19 board members.

Two ways to include the interests of fisheries

From 2014 to 2020, the terminology described seven out of the 10 Danish FLAGs as ‘integrated LAGs’, which meant that they simultaneously implemented the RDP and the EMFF. This integration resulted in fisheries’ interests being only modestly represented by the main actors on the boards. Consequently, fisheries’ interests were often discussed by other partners on the boards, legitimised on the grounds that most people in the area lived close to the sea—a fact that is illustrated in a statement made during the 2015 initiation period in the ‘integrated’ LAG Thy Mors and the ‘integrated’ LAG Bornholm. In both cases, the focus on fisheries was added a year after the establishment of the LAG. LAG Thy Mors stated:

If you look at a map, there are not very many people in our two municipalities that are very far from the water, and we will therefore generally be able to relate to the projects [...]. (LAG Thy-Mors, 2015)

Moreover, in LAG Bornholm:

Due to the island’s long-standing tradition of fishing and shipping and the fact that approximately 2/3 of the island’s inhabitants live along the coast in one of the many port cities, virtually all Bornholmers have some connection to the maritime environment [...]. (LAG Bornholm, 2016, p. 3)

These examples of ‘integrated LAGs’ differ from ‘autonomous FLAGs’ in their inclusion of fisheries-related board members. Thy-Mors’ list of board members, after the general meeting in which the FLAG and LAG activities were combined, showed that four board members represented local citizens, two represented local businesses, six represented local associations, two represented local authorities and four represented fishing interests. During the extraordinary GA, the original board was thus supplemented by four members related to the fishing industry and fishing areas (LAG Thy-Mors, 2016, p. 5). Thus, fisheries’ interests were not widely represented, which shows that sectoral fisheries actors are just one of the actors interacting with and influenced by other territorial actors in this type of FLAG.

The ‘autonomous’ FLAG Nord was *not* created as a LAG before it became a FLAG (FLAG Nord, 2016). Its fishing interests were therefore clearer from the start. This start, in the context of FLAG Nord covering a more fishery-dependent area (it is the area in Denmark where most fish are landed), meant that a larger proportion of the board members had contact with the fishing industry or sea-related activities. Thus, in this FLAG, only four out of 15 board members did not have a fishing background. Similarly, the autonomous FLAG Jammerbugt’s board, which consisted of only five people, had a close connection with the fishing industry, which in that area is characterised by small-scale coastal fishing and secondary activities. Finally, the board of the last of the three ‘autonomous FLAGs’, FLAG Vestjylland, consisted of 11 board members. Here, the

inclusion of fisheries' interests was vaguer because neither in the application nor on the association's website was it possible to detect group affiliation. It seems that the geographic coverage of this very large FLAG area was given stronger weight than in the tripartite distribution focusing on the inclusion of public, private and voluntary sector actors. The strategy did not include wider explanations about more specific institutional arrangements made to secure the responsiveness of this FLAG's governing processes to fisheries' interests. Table 1 describes the Danish FLAGs' characteristics.

In Denmark, the low level of representation of fisheries' interest, especially in the 'integrated LAGs', could, on the one hand, result in an 'out of sight out of mind' situation, where the board is maybe not responsive to fisheries' interests. On the other hand, the lack of representation could contribute to fisheries being examined anew, with a focus on diversification, other harbour activities and tourism. An evaluation of the FLAG scheme in Denmark (Cowi, 2019) showed that FLAG projects during the 2014–2020 programming period resulted in only limited support for fisheries. Many project holders indicated that questions concerning local coastal fishing, the improvement of coastal fishing ports/landing sites, and increases in the number of outlets for the coastal catch were 'not relevant' for their project. It thus seems that the institutional design of FLAGs in Denmark did not lead to the solid inclusion of fishing interests, which corresponds with the weighting of a territorial focus in the national programme.

Civic involvement in strategic planning

The process of involving the local community and wider civil society during the strategic planning phase is important for input legitimacy. Such processes differed across FLAGs and ranged on a continuum from relatively significant involvement to almost no involvement. Processes included both negative (delineating/limiting) and positive (improving) citizen involvement. Time pressure came into play. For almost all 'integrated LAGs', most of the initial community involvement occurred during the development of the RDP-financed strategy. Because of a delayed executive order, a kind of add-on process was then used to ensure the inclusion of fishing interests almost 2 years later. One example of such an add-on process is found in the strategy developed in LAG Djursland (2016, p. 6): 'In addition, meetings have been held with the chairman of Bønnerup fishing association/other fishermen, to ensure that the strategy and focus areas are sufficiently anchored with the local fishermen'. Another example comes from LAG Halsnæs Gribskov (2016, p. 5):

Focus interviews were conducted, and on 11 June, a café workshop was held with representatives of the fisheries, the ancillary industry, the tourism industry, business organisations and the LAG board, where a SWOT analysis was prepared, as well as the overall framework for the strategic vision, goals and activities.

The circumstances of a well-designed participatory process have thus been challenged with regard to the involvement question in 'integrated LAGs'. The part of the strategies that pertained to fishing came in second, even though several groups mentioned the importance of involvement in their strategies. With regard to the 'autonomous FLAGs', the process of inclusion in strategic planning was not an add-on; it was instead time-constrained. Unlike 'integrated LAGs', these FLAGs had no established participatory process to lean on, although some mentioned the helpfulness of experience and networks from a former FLAG. Only one of the three 'autonomous FLAGs', however, described a board of directors workshop in which people were thoroughly involved. The other FLAGs implemented a relatively defensive (and almost absent) involvement strategy or let

TABLE 1 Classification of Danish Fisheries Local Action Groups (FLAGs) 2014–2020.

	Descriptive terminology	Shared activities and mandates with a local action group (LAG; yes/no)				FLAG identification
		Legal entity	Board members	Strategy	Administration	
FLAG Vestjylland	FLAG	No	No	No	No	Autonomous
FLAG Jammerbugt	FLAG	No	No	No	No	Autonomous
FLAG Nord	FLAG	No	No	No	No	Autonomous
LAG Thy-Mors	LAG	Yes	Yes	Yes	Yes	Integrated
LAG Djursland	LAG	Yes	Yes	Yes	Yes	Integrated
LAG Gribskov Halsnæs	LAG	Yes	Yes	Yes	Yes	Integrated
LAG LLSÆ	LAG	Yes	Yes	Yes	Yes	Integrated
LAG Bornholm	LAG	Yes	Yes	Yes	Yes	Integrated
LAG Småøerne	LAG	Yes	Yes	Yes	Yes	Integrated
LAG MANK	LAG	Yes	Yes	Yes	Yes	Integrated

the extent of people's involvement depend on the board of directors' contact with their support base:

In the light of a relatively short time horizon, the Board of Directors finds that both up to and during the preparation of the proposal of the development strategy, there have been a good dialogue and contacts with key actors and partners. (FLAG Vestjylland, 2016, p. 5)

The practice of 'relying on the officers of recognised local organisations to represent their members' based on time restrictions is what Phillipson and Symes (2015, p. 356) found critical and limiting in terms of the variety of views and diversity involved in fisheries and coastal development.

In terms of aspects of transparency and openness, which Schmidt (2013) highlighted as throughput legitimacy, all the associations produced minutes during their GAs as well as annual reports and accounts; these are available on the associations' websites. Many of these websites also feature information on events organised by the associations to inform the public about their programmes and bring stakeholders together, and some websites list the projects that have been supported.

Identical model for input legitimacy during the transition period in 2022

During the transition between the two programme periods, it was decided that a national support scheme called NFLAG would be created. This decision was primarily due to the extension of the RDP, which occurred at the EU level. NFLAG continued with the same established associations and strategies that had operated during the 2014–2020 period. This meant that rules for input legitimacy with elected boards and an association model were continued.

As rural LAGs strategised during the autumn of 2022, the FLAGs were also given the opportunity to create a strategy in line with the process that was in effect in relation to the rural LAGs. There was, however, a risk in choosing to start strategising, as FLAGs were not part of the programme submitted to the EU at that point in time. Some FLAGs did, however, not begin making new strategies because it was still up for political discussion whether FLAGs in the years to come should be implemented like the current 'integrated LAGs' and 'autonomous FLAGs' funded by the EU, whether they should be implemented through national NFLAG funds, or whether no groups would be financed in Denmark at all. One argument among FLAGs for not starting the strategy process was that input legitimacy processes are demanding, and it would be wrong to ask the population and board to commit time and ideas to a strategy development process if they risked being left without any support in the Danish programming for FLAGs afterwards.

Case 2: Input legitimacy of Finnish FLAGs (2014–2020)

National institutional design of access and influence procedures

Similar to the Danish case, the Finnish institutional design was based on the associational format; however, the associational model was used as a regulatory framework and practised at arm's length to a larger extent. Regulated by the Ministry of Agriculture and Forestry, Finnish FLAGs were considered independent fishery groups operationally distinct from the LAGs, and yet each FLAG was administratively and legally connected to one 'home' rural LAG association from which it derived its input legitimacy. This connection provided access to extended LAG experiences and networks, most noticeable as shared administrative support such as personnel, offices and

costs. For the FLAGs, there was also a choice of collaborating with manifold LAGs (Ministry of Agriculture & Forestry, 2014; Salmi et al, 2022, p. 91).

Regarding the composition of FLAG boards and membership procedures, the Finnish system was not based on GA elections, unlike their Danish counterparts; the Finnish system rather found its democratic core in appointment procedures (such as invitations and self-nominations as further elaborated below). That is, the system showed a lesser level of input legitimacy than the system of Danish FLAGs. FLAG boards were obliged to comply with the tripartite (state–market–civil society) principle, which meant that they should include public, private and voluntary sector actors, and the boards were thus composed of representatives of the public administration, entrepreneurs, communities and local people. The national directives state that the turnover of members should be reflected in the rules and that the number of members on the board should be sufficiently large (Ministry of Agriculture & Forestry, 2014). The Finnish FLAG board typically consists of 10 to 11 members (Salmi et al., 2020).

When investigating the background of the flexible composition of FLAG boards, a senior advisor at the Ministry of Agriculture and Forestry stated:

We have not had any unified model for composition of the boards. Each group has implemented the arrangements in its own way. Some groups have only had a ‘fisheries division’ related to the ‘home’ LAG; some have had a steering group, and some of the rural LAG boards have played a larger role than others. (Personal email correspondence, 1 June 2022).

Based on the framework dictated by the Ministry of Agriculture and Forestry (2014–2020), the following spread of Finnish institutional FLAG models appears (see Table 2). First, the differentiation is based on the terminology used to name FLAGs (*‘kalatalousryhmä’* [in Finnish] ‘fishery group’) and to describe the affiliation to the ‘home’ LAG: *‘jaosto’* = division, *‘osa’* = part of, *‘työryhmä’* = working group and *‘fiskeleader’* [in Swedish] = fisheries leader. These definitions describe variations and the embeddedness of FLAGs within the organisational governance structure of the ‘home’ LAGs.

Second, the differentiation can be noticed in the shared activities and joint mandates as in the Danish case. Accordingly, Finnish FLAGs can be identified as (1) ‘semiautonomous’, (2) ‘integrated’ or (3) ‘associated’. In general, FLAGs have representation on the LAG boards and vice versa, but this organisation is not applicable for all FLAGs.

When illustrating basic legitimacy issues consisting of accessing and making people’s voices heard, the Finnish FLAG mechanisms diverge from the Danish processes. In Finland, the procedure for forming FLAG boards is based on invitations and self-nominations (Salmi et al, 2022; FLAG managers interviews, May 2022) rather than election as is the case in Denmark. The process encourages self- and/or third-party invitations to participate, as well as mutual discussion between the FLAGs and interest group representatives. Some FLAGs officially distribute invitations by email or via social and printed media and thereby provide access to a broader public. The FLAG managers are locally well acquainted and invite potential candidates; moreover, it is also possible for independent individuals to be appointed to the FLAG board by nominating themselves at the annual GAs. The official appointment of FLAG board members and approval by the rural LAG associations take place during the annual GAs of the ‘home’ LAG. Another means to fill the FLAG boards is through an independent committee; for example, the board of Åland FLAG is composed of three individuals who were approached and invited to be potential FLAG board members (Åland LDS, n.d., p. 6).

TABLE 2 Classification of Finnish FLAGs 2014–2020.

	Descriptive terminology	Shared activities and mandates with 'home' LAGs (yes/no)			FLAG identification
		Legal entity	Board members	Administration	
Ostrobothnia FLAG Archipelago Sea FLAG	Working Group	Yes	No	Yes	Semi autonomous
	Part of	Yes	No	Yes	
Southern Finland FLAG	Division	Yes	No	Yes	Integrated Associated
Åland FLAG	Fisheries Leader	Yes	Yes	Yes	
Kainuu and Koillismaa FLAG	Division	Yes	Yes	Yes	
Bothnia Bay FLAG	Working Group	Yes	Yes (MAYBE)	Yes	Associated
Easter Finland FLAG	Division	Yes	Yes (DBL board ^a)	Yes	
Lapland FLAG	Division	Yes	Yes	Yes	Associated
Selkämeri and Pyhäjärvi FLAG	Part of	Yes	Yes	Yes	
Central Finland FLAG	Division	Yes	Yes	Yes	

^a One FLAG formed two different types of boards: a decision-making (FLAG) board and a monitoring board.

One shortcoming of the Finnish input legitimacy process is the softness of the institutional design since membership is not compulsory. There is no requirement for board members to be members of either the 'home' rural LAG or the FLAG. This is explicitly stated in Bothnia Bay LDS: 'Being a member of the FLAG does not require becoming member of the LEADER group, but it is possible to also join the LAG' (Bothnia Bay LDS, *n.d.*, p. 20). Additionally, the lack of regulation about the duration of each mandate and the age restriction applied to board members (FINLEX 514/2001) is noticeably inadequate. Some FLAGS restrict the duration of the mandates, while others leave this question out of their LDSs. One reason for this omission is that the number of eligible local parties is limited, and the FLAGS themselves consider it worthwhile to have a freely circulating system. Some FLAGS nominate potential board members annually and simultaneously renominate board members. In other cases, the nominated representatives go through a regular rotation during the programming period (FLAG managers interviews, May 2022). These diverging processes can be useful, as there is a limited group of potential board members; however, these processes can cause conflict, as they may hinder the rotation of the board members.

Inclusion of fisheries' interests in a plethora of ways

The involvement of fishing interests constitutes a strong front in the Finnish case. The 'fishing' focus of Finnish FLAGS has been the core of the CLLD approach since its start and an imbued and central part of all LDSs. Fisheries operators have good opportunities to become board members, yet it is not a self-fulfilling act for the fishers. The national regulations state that FLAGS should not turn actors away and that the composed groups should present sufficient administrative capabilities to effectively implement the program (Ministry of Agriculture & Forestry, 2014). The representatives of the fisheries sector vary across FLAGS, but there is a general aim among FLAGS to attract people who have a genuine interest in the fisheries sector.

Given the tripartite public-private-voluntary composition of FLAG boards, the representation of the fisheries sector is solid, but it also varies across FLAGS. However, because of people's limited availability, this three-sector representation is not always possible, as it is difficult to simultaneously attract all groups, which creates situations in which other groups fill vacant positions; moreover, the lack of municipal representation in Lapland results in a FLAG board where the majority of representatives are from the fisheries sector (personal correspondence with the Lapland FLAG manager, May 2022). The Åland FLAG has instructed that the 'board shall consist of at least 2/3 of people with a background in professional, sports- or household fisheries, water owners, fish farming and environmental organisations' and that 'there must be one person representing fishing activities and one person representing aquaculture on the FLAG board, to ensure the connection of fisheries with the business sector' (Åland LDS, *n.d.*, p. 6).

Civic involvement in strategic planning

The institutional arrangements of input legitimacy are directed by the LDS process. Some Finnish FLAGS provide clear numbers about civic involvement in the planning process. Ostrobothnia FLAG described the preparatory process for the LDS as versatile:

Based on seminars, workshops, info sessions and public opinion, they have gathered material for the process. In total, 319 persons attended 16 meetings, seminars, and workshops, including 128 women and 17 individuals under 25 years of age. An additional 24 information sessions were attended by 654 persons, including 311 women and 37 people under 25 years of age. Municipalities, development authorities and development companies gave their opinions, constituting a total of 29 responses to

the draft strategy during the preparation stage. In total, approximately 973 people had the opportunity to take part in and influence the content of the LDS. (Ostrobothnia LDS, p. 2)

Civil society was recurrently engaged in the initial FLAG strategy processes. In Åland:

the LDS strategy process started in 2011 with open discussions and local public meetings in seven municipalities (seven meetings and 49 participants) and was followed by a survey on future ideas for development (29 answers). (Åland LDS, n.d., p. 6)

In the Eastern Finland FLAG, the initial process was ‘kept on a local level, involving local citizens and interest groups during four public meetings in 2013, in which 168 persons participated. Here, the FLAG-arranged workshops were called “Future auctions” and entailed segments in which the public “sold” their ideas to the LDS’ (Eastern Finland LDS, n.d., p. 28).

A survey method aimed at collecting information for the LDS process from the public was used in several FLAGs. Within the Southern Finland FLAG, information was gathered through surveys distributed to all cooperatives and interest groups, municipalities, information- and development organisations, professional fishers, fish tourism entrepreneurs and regional rural LAGs (ESKO LDS, n.d., p. 12). The Bothnian Bay FLAG sent a survey to professional fishers (15 answers; Bothnian Bay LDS, p. 7) and thereby created a basis for broader stakeholder participation in their LDS process.

In relation to ongoing transparency and openness, Finnish FLAGs present positive features, but nonetheless, they have also faced challenges. Most Finnish FLAGs have an integrated web page on the ‘home’ LAG site, and the use of web pages and other social media activities (Twitter, Facebook, Instagram, YouTube) varies greatly across FLAGs. The board meetings’ procedures and decisions, as represented by minutes, are not publicly presented online, thus limiting the level of transparency.

Early approval of strategies in 2022 and a future focus on communication

The third FLAG programming period in Finland, guided by the EMFAF law (FINLEX, 2021; EU, 2021), was prepared by the Ministry of Agriculture and Forestry, which invited the FLAGs to a shared evaluation and planning meeting in early 2020. The EU Commission approved the Finnish European Maritime, Fisheries, and Aquaculture Fund (EMFAF) programme on 3 August 2022, and 11 FLAGs that had submitted their local development strategies (LDSs) received approval. The EMFAF law concretised earlier regulations and defined the FLAGs’ legal associational status such that ‘the managing entity [“home” LAG] or the fisheries’ leader group shall be a registered association’. The new operational programme did not impose any major new elements regarding the institutional structure of the Finnish FLAGs; however, it emphasised ‘the exercise of the public administrative functions’, tying the FLAGs closer to the rural LAGs through statutory obligations to follow, for example, public administration practices and digital communication praxis (FINLEX, 2021, § 5).

Regarding transparency, the FLAG system was designed to be in accordance with the 2019 FLAG evaluation (Salmi et al., 2020), which emphasised that FLAGs are not publicly known. The FLAGs and the board members are often mistaken for other organised fisheries sector groups; however, people generally recognise the FLAG group by their managers rather than by the board members. Henceforth, attention has therefore been placed on external communication (personal communication with two FLAG managers, 28 August 2022), and the Ministry of Agriculture

		Focus on input legitimacy	
		High	Low
Focus on fishing interest	High	?	← FI 2014-2020 FI 2021-2027
	Low	↑ DK 2014-2020 DK 2021-2023	

FIGURE 4 Potential ‘high-high’ input-legitimacy goal combined with fisheries’ interest.

and Forestry designates resources as specific ‘networking compensation’ for FLAGs to use for communication. Through this contribution, increased awareness, new networks, expanded public activities, a wider range of FLAG applicants and new projects are expected to emerge.

Discussion of theoretical and practical political implications

How many faces can input legitimacy have?

By focusing on input legitimacy, we have chosen to concentrate on ‘the mechanisms that channel citizens’ input into the governance process’ (Jensen & Martinsen, 2018) and on how local people and fisheries’ interests are involved. Although, inspired by the Finnish LAG system, Denmark initiated election procedures to improve input legitimacy in 2007, different models have been chosen for the creation of FLAGs in the two countries.

Our findings show that a focus on input legitimacy and strict institutional design related to ensuring access and influence procedures for the general population as well as for fisheries-related interests does not necessarily result in the inclusion of fisheries interest groups. In our results, neither Danish nor Finnish FLAGs achieved potential ‘high-high’ scores in both ‘input legitimacy’ and ‘fisheries’ interests’ (see Figure 4). This finding highlights the challenges faced in both including the general population and promoting specific interests through governance networks (Boedeltje & Cornips, 2004), as well as the necessity of considering specific historical and political contexts (Sørensen & Torfing, 2005) when assessing the democratic nature of the FLAG. Scharpf (Jensen & Martinsen, 2018, p. 49) wrote in relation to the EU that non-majority institutions can be established to ensure output legitimacy but only when they are under the control of institutions elected through a majority. As long as the Finnish FLAGs are narrowly framed and focused on fisheries’ activities, they can operate more freely; however, if they are given increasing focus areas, the demand for input legitimacy will also increase. According to Scharpf (2018, p. 49), ‘majoritarian institutions’ are best able to serve the common good.

However, for the association model as a majoritarian institution to fulfil its potential, it needs to be maintained through relevant activities, including activities for its members and informational activity. In the 2014–2020 period, these tasks were difficult to perform due to the General Data Protection Regulation, which meant that the rural LAG and FLAG associations that were based on membership suddenly lacked demographic information and had to create their membership base anew. Many LAGs are experiencing administrative burdens and thus have

not had the resources to encourage members to reregister—something that may require several rounds of contact with their members. Furthermore, it is necessary for board members to be strongly committed to the fisheries' cause; a strong FLAG community is also necessary to secure an electoral basis that creates competition for board mandates, as well as 'FLAG awareness', visible FLAG goals, projects and other activities.

Numerically, as shown in the Danish case, fishing interests are weakly represented on most Danish FLAG boards, and FLAG project organisations have substantially failed to indicate that their projects improve small-scale fisheries' interests. However, the Finnish FLAGS often represent fisheries' interests and values inclusively; nevertheless, parts of the fisheries' sector (e.g., tourism) are often embodied in LAG-funded activities. In Finland, as shown, the associational model is anchored in the 'home' LAGs, where board members are elected, thereby facilitating the FLAG's stronger focus on the fisheries sector. This anchoring corresponds to Scharpf's (1999) investigations of input legitimacy in the EU, where general input legitimacy and representativeness are mainly maintained through the national states on which EU cooperation legitimacy depends.

In addition, input legitimacy in Finnish FLAGS is meant to be maintained through municipally appointed representatives, as these democratically elected representatives are considered to ensure the general representativeness and the interests of the public (Granberg et al., 2015). In Finland, access and influence procedures related to FLAGS appear to be more responsive to fishing interests and the bottom-up commitment of the fishing sector, thereby making space for permitted manoeuvres within local contexts. The question is whether these fisheries' interests are the usual suspects or if new and less visible groups are provided with access through the Finnish structure, that is, whether Finnish FLAGS provide a voice to the people or reinforce existing power relations and inequalities. We know little of the exact and most recent socio-demographic profile of the FLAG board members in the two countries. Tendencies towards requests on registration of data for monitoring and evaluation in relation to number of board members by gender and age would, however, allow for further research into the ability of different organizational forms to engage broadly. A recent case study of rural LAGs, for example, indicated trends towards that the boards were younger or were about to become younger and with a higher proportion of women in countries with elected boards than in countries with appointed boards (Thuesen et al., 2023). A hypothesis to test in future research could thus be if on a wider scale organisational form impacts on composition and focus of interest in FLAG projects.

The findings from Denmark call for a discussion of whether it is legitimate to transform fisheries' development into rural development with a 'fisheries twist'. Jentoft (2000) mentioned resistance from fishing groups and the degree of autonomy provided to co-governing entities, as well as how this resistance is connected to a possible degree of legitimacy. The more autonomy there is, the more legitimacy there is among users (fisheries' actors); however, the less autonomy there is, the more legitimacy there is among other interest groups (the general population in the area) that are not involved in the co-governance process.

The influence of fisheries has been specified in the Finnish EU fisheries program, the FLAGS' LDS objectives and on the FLAG boards, introducing a dynamic mechanism and an alliance between the bottom-up FLAG system and the top-down governance structure, as represented by the Ministry of Agriculture and Forestry. During the two programming periods, open and ongoing communication created mutual trust between the authorities and those at the grassroots level, replacing some of the official requirements for 'input-legitimacy', which has proven to be suitable and functional in the Finnish context. In line with the emphasis of neo-endogenous thinking on interaction and learning, in this article, we set the stage for the

creation of reflexive platforms based on which discussions among actors in the vertical multilevel governance of FLAGs can begin and feedback can be given on FLAGs' organisation models. Our empirically oriented neo-endogenous approach makes it possible to challenge assumptions and mirror the institutional implementation of similar programme initiatives in various contexts (Gkartzios & Lowe, 2019).

Our investigation, illustrated in Figure 4, highlights important aspects to consider when organising FLAGs. However, just as Scharpf (2018, p. 48) stated, the only way the EU will be able to ensure input legitimacy is through differentiated integration, where the integration of nation-states develops in different directions and to different degrees; our analysis shows that the same goes for FLAG organising. In regard to the lessons learned for the future institutional design of FLAGs as key neo-endogenous actors, it is important to highlight the necessary space for diversity enhancement.

Ray (2006) emphasised years ago that neo-endogenous rural policy development includes a built-in mainstreamed acceptance that 'requires interventions to be responsive to the local context and to allow for the active participation of local actors'. It seems that there has been more reflection in the Finnish Ministry than in the Danish Ministry regarding local fishing operators and what FLAGs are aiming to achieve. This responsiveness is important to learn from while still focusing on breaking up existing power relations and inequalities (Phillipson & Symes, 2015) and raising public awareness about Finnish FLAGs. However, responsiveness is also related to proper and wholehearted institutional framing by the ministries. Here, the important lesson for the future design of FLAGs is that much more effort should be made to level out the periods of haste and delay that have characterised FLAG implementation in contrast to the implementation of LAGs.

CONCLUSION—STRUCTURED FORMULA AND OPEN BOOK GOVERNANCE

This study contributes to the understanding of FLAG input legitimacy and emphasises the input side of Easton's (1965) input–output model. Taking Scharpf's (1999, 2003) concept of input legitimacy as our theoretical point of departure, we focus on democratic influence by analysing how access, influence procedures, transparency and openness contribute to FLAGs' input legitimacy.

We conclude that among other variables, sociocultural differences affect the legitimacy of decisions made at the national level in Denmark and Finland—the weight put on procedural aspects and regulations when composing FLAG boards and the degree of public emphasis on well-balanced representation and processes of inclusion when outlining the FLAG strategies. Additionally, we notice a contextual difference and cultural dependency in how much of the in- and throughput is achieved for the divergent fisheries sector or local communities in the two countries. The Finnish allow for independence, which is approved by the Ministry of Agriculture and Forestry. This allowance facilitates greater responsiveness to local actors, as it gives 'self-regulated' power to the local fisheries' interests instead of creating a binding top-down steering framework. We did not notice any discrepancy in the protocols of board appointments or in the misuse of such appointments; however, the success of the local implementation of FLAGs, as shown in this article, is an empirical question that has previously been studied (Salmi et al., 2020). Moreover, no misconduct in this local implementation has been shown thus far, confirming that the less controlled input legitimacy mechanism in Finland works without imposed control systems.

Danish FLAGs show that they are experienced in input legitimacy; however, compared to the Finnish case, the Danish fishery sector's interests are not as well represented within the country's

FLAG governance structure (on the boards). The associational model is central in both cases, yet when legitimacy is measured according to the way FLAG boards are constructed, the Danish case shows better results; in the case of Finnish FLAGs, input legitimacy rests in the 'home' LAGs. In Finland, the input legitimacy level is therefore not as well-adjusted as it is in Denmark; nonetheless, the fisheries' interests are central to the Finnish FLAG system, in which the voices of professional and small-scale fishers are easily heard all the way up to the Ministerial level and back.

This study implies that FLAGs need to include a balanced and diverse group of people who trust one another; these people must represent both territorial and sectoral interests to develop a just and efficient system of public funding. There are risks to consider in the future operations and development of the FLAG system; for example, a clear path for overlying programming periods is needed, and delays in obtaining national funding, as well as the unclear messages received from the top about national operational programs, are lingering challenges. The lessons learned from the comparative FLAG governance case study can be summarised as a 'Danish structured formula' and 'Finnish open book' governance. Whether it is possible to achieve the ultimate 'high-high' level of legitimacy in combination with fisheries' interest requires further research as well as empirical neo-endogenous experimentation.

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Kristina Svelds and Annette Aagaard Thuesen have evenly contributed significantly in the preparation and development of this study.

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INTERVIEWS

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