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Frame Diffusion: How European Union-Type
Common Markets Have Spread Around the World

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Abstract

Why have many regional organizations, such as ASEAN, Mercosur and SADC, adopted EU-type common markets and customs unions? I propose the mechanism of frame diffusion—the process by which a cognitive schema that originates in one organization shapes decision making over institutional choices in other organizations—to account for the spread of a specific institutional form across structurally diverse contexts in the absence of outside imposition. The argument is developed in three steps. First, I contend that existing arguments of international economic cooperation and regional market building drawn from International Political Economy, Neofunctionalism and Realism are largely indeterminate in terms of the specific institutional form that such cooperation takes. Second, I posit that developments in Europe and North America in the 1980s and early 1990s acted as a catalyst for the emergence of a set of frames that depicted ambitious regional market building as an appropriate institutional solution to challenges in international competitiveness. These guided policymaking in other regions under conditions of negative externalities and uncertainty. Third, I illustrate this argument in an exploratory comparison of institutional change in three ‘most different’ regional organizations: the Association of Southeast Asian Nations, Mercosur and the Southern African Development Community. The presented argument has implications for research in International Political Economy and comparative regionalism.

Keywords

Regional organizations; common market; institutional choice; institutional design; diffusion; framing

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1 Introduction

International economic cooperation below the multilateral level has become a staple feature of the world economy. Besides bilateral trade agreements, an important part of this development occurs in the context of institutionalized cooperation among neighbouring countries. Many regional organizations have come to endorse ambitious objectives for economic cooperation such as common markets and even economic unions. Such objectives, codified in formal treaties and often accompanied by detailed action plans, are important because they serve as guiding frameworks for more detailed agreements and secondary legislation that, upon domestic ratification, are binding on member states. They also shape expectations among a variety of social actors regarding the future direction of economic policies in a region.

Curiously, these decisions often mirror basic institutional choices made by policymakers in the European Union (EU), the most prominent and successful pioneer of regional economic cooperation. Consider the three most prominent regional organizations in the developing world, the Association of Southeast Asian Nations (ASEAN), the Common Market of the South (Mercosur), and the Southern African Development Community (SADC). All three initially limited cooperation in the economic area to functional coordination of policies in specific areas—akin to the European Coal and Steel Community—before shifting towards a liberal market building approach that became gradually more ambitious. Today, policymakers in all three organizations pursue the objective to establish an EU-type common market that involves the free flow of goods, services, capital and labour.

What accounts for these converging institutional choices in international economic cooperation? Answers to this question can be sorted into three stylized explanations: convergent institutional choices might be the result of (1) like, yet independent, reactions to similar structural conditions, (2) external imposition by hegemonic actors, or (3) diffusion (see Elkins and Simmons 2005: 35). In this paper, I develop a variant of the third explanation by proposing an argument about what I term frame diffusion. I suggest that in an ill-defined situation of abstract incentives for international economic cooperation and receding constraints on liberal economic policies, the diffusion of a specific set of frames—derived primarily from experiences in Europe and North America—guided policymakers in the three regions to adopt converging institutional choices across structurally diverse contexts in the absence of outside imposition. Frame diffusion, I thus posit, is key to understanding the *specific form* that institutional choices in international economic cooperation take. This argument is developed in three complementary steps.

First, I suggest that existing arguments on international economic cooperation and regional market building, which tend to fall into the first two categories of explanation, are largely *indeterminate* regarding the specific institutional form that international economic cooperation takes. International Political Economy and Neofunctionalist arguments view similar institutional choices as like but independent reactions to similar patterns of economic interdependence and spill-over dynamics (E. B. Haas 1958; Mattli 1999; Milner 1995), whereas Realist-inspired arguments emphasizing the role of international financial institutions and the United States (US) focus on hegemonic imposition (Haggard and Kaufman 1992; Teichman 2001). These arguments offer important insights into the general prerequisites for economic cooperation in all three regions, but in the absence of unambiguous economic incentives, strong interest group pressure, supranational entrepreneurship and direct imposition, these arguments generate no clear predictions about the specific institutional form that international economic cooperation takes. Hence, the gradual emergence of EU-type market building objectives across three structurally diverse regions constitutes a puzzle.

Second, I propose the mechanism of frame diffusion to explain this puzzle. Combining insights from research on frames with research on diffusion, frame diffusion captures the process by which a cognitive schema—linking a particular understanding of a problem to specific institutional solutions—that originates in one organization shapes decision making over institutional choices in other organizations. Converging institutional choices in ASEAN, the Southern Cone/Mercosur and SADC became possible, I submit, because of the diffusion of the ‘new’ common market and related frames. With Europe’s 1992 Programme acting as a catalyst, ambitious regional market building came

to be seen as an appropriate solution to the problem of international competitiveness in the 1980s¹, a process that was reinforced by the emergence of distinct, but related frames such as the North American Free Trade Agreement (NAFTA) and the “open regionalism” frames in the 1990s. As policymakers in the three regions were confronted with competition from other economic blocs or faced situations of uncertainty regarding the very survival of their organization, they negotiated responses based on prominent frames, leading to the gradual diffusion of an EU-type common market model.

Third, I offer a plausibility probe of this argument by comparing critical episodes of institutional change in ASEAN, Mercosur and SADC. Such a combination of cross-case and within-case qualitative methods is particularly suited to the evaluation of arguments about diffusion (see Starke 2013). Within-case analysis draws on data that involves interviews with policymakers, unpublished archival documents and the analysis of secondary sources. The evidence is consistent with a set of observable implications of the frame diffusion argument, which, taken together, are distinct from those of alternative arguments. However, the narrative should be seen as suggestive, not definitive. ASEAN, Mercosur and SADC are specifically useful for cross-case comparison of diffusion processes for two main reasons. First, these cases differ on a number of important endogenous variables, thus following a most dissimilar systems design. Specifically, they vary in important structural (development levels, economic profiles), institutional-political (political [democracy vs. autocracy], economic and legal systems [common law vs. civil law]), and cultural conditions (dominant religion, civilizational category) that have been argued to affect the economic liberalization strategies of states (good overviews are Mansfield and Milner 1999; Mansfield and Solingen 2010), which allows us to control for these variables largely by design. Second, the three cases can be interpreted as least likely cases for the gradual adoption of EU-type economic cooperation. Unlike many other regional organizations in the developing world that emulated the EU ‘model’ from the beginning, policymakers in these three regions explicitly rejected it initially, as we will see. This was the result of a deep-seated scepticism about what was perceived as overly ambitious forms of regional economic cooperation in the 1960s and 1970s (Lee 2003: 47; Campbell et al. 1999: 56-64; Severino, 2006 #1415: 4-6).

The frame diffusion argument has implications for several important debates, which are detailed in the conclusion. It is compatible with a growing body of work that seeks to develop a constructivist approach to the study of International Political Economy (Abdelal et al. 2010), but shifts the focus from the domestic to the transnational origin of cognitive tools. It also bolsters recent research on diffusion processes in the international economy (Simmons and Elkins 2004; Baccini and Dür 2012), but grounds basic diffusion mechanisms in cognitive micro-foundations. Finally, the argument is consistent with a growing research programme on diffusion in comparative regionalism (see Börzel and Risse 2012). It suggests, however, that scholars ought to pay more attention to the conceptual and theoretical implications of the contextual difference between organizational or cross-national diffusion.

2 The puzzle: Converging institutional choices in regional market building

Even though the EU might be its most prominent and successful exponent, it is not the only regional organization that seeks to establish ambitious forms of market building. The members of ASEAN, the Southern Cone/Mercosur and SADC have also adopted EU-type market building processes, culminating in the codification of the goal to establish a common market that involves the free movement of goods, services, capital and labour, and, in Mercosur and SADC, also a customs union. Table 1 shows these gradually converging institutional choices across two central episodes.

¹ For the sake of simplicity, I use the acronym EU to refer to today’s EU as well as its predecessor, the European Community.

Table 1. Increasing convergence in institutional choices in three regional organizations

Episode	ASEAN (1967)	Southern Cone/Mercosur (1980)	SADC(C) (1981)
Early choices	Selective functional cooperation, mainly in foreign policy; limited economic cooperation after 1976 (preferential trading, industrial complementation)	Selective functional cooperation between Argentina and Brazil, mainly in nuclear energy; limited economic cooperation from 1986 onwards (sectoral liberalization)	Selective functional cooperation, mainly in non-economic areas; limited economic cooperation after 1987 (trade and investment promotion activities).
First transformative choice	1992 ASEN Free Trade Agreement (AFTA): liberalization of trade in goods	1988 Argentina-Brazil FTA: liberalization of trade in goods and services	1993 Windhoek Treaty: Common market in goods, services, capital and labour
Second transformative choice	2003 Bali Concord II, 2004 Vientiane Action Programme: Common market in goods, services, investment, some capital, and skilled labour	1991 Asunción Treaty: Common market in goods, services, capital and labour; customs union	2003 RISDP: Common market in goods, services, capital and labour; customs union; economic and monetary union

Source: Own elaboration.

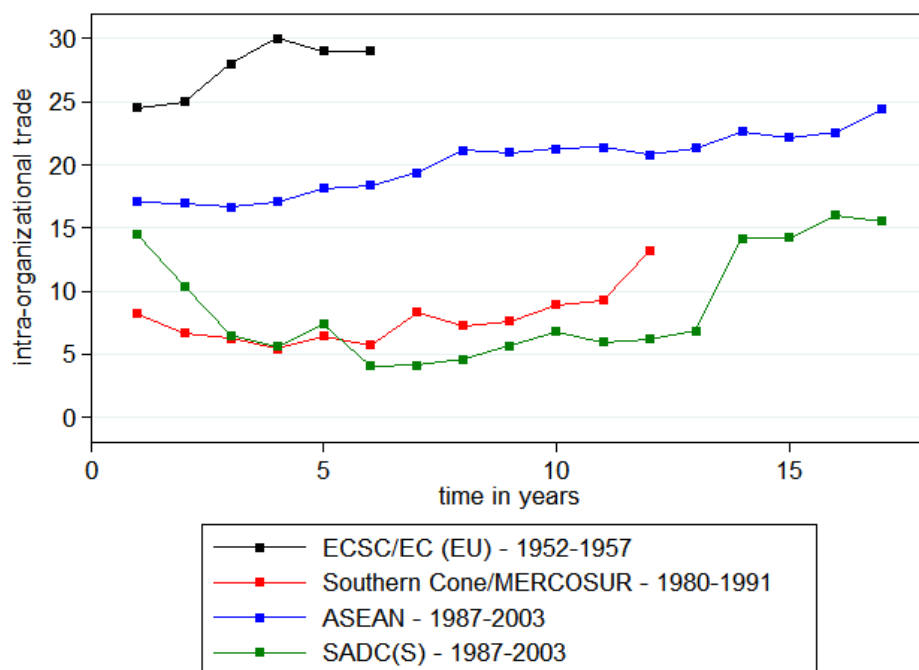
What explains these converging institutional choices? Existing arguments suggest that choices similar to those in the EU are the result of policymakers in the three regions reacting rationally to similar incentives and constraints, or that powerful outside actors imposed the same choices across organizations. Even though they offer important insights into the general prerequisites for economic cooperation in all three regions, I suggest that they are indeterminate regarding the specific form that such cooperation takes. I consider the three main arguments in turn.

The first argument, advanced by scholars of International Political Economy, focuses on economic interdependence and private interest groups that lobby governments in order to facilitate transnational economic exchange. Recent decades have witnessed technological advances that expanded opportunities for international economic transactions. When tariff and non-tariff barriers, such as technical regulations and sanitary measures, continue to hamper cross-border trade, international agreements can be powerful tools to reduce transaction costs and to credibly commit states to liberal economic policies (Mansfield and Milner 1999: 605-6). From this perspective, private interest groups are prompted into action when the transaction costs of, and the potential for increasing, transnational economic exchange are high (Mattli 1999; Milner 1995; Moravcsik 1998; Solingen 2008). The ambition of regional market building, consequently, varies with opportunities for, and constraints on, transnational economic exchange.

There is little doubt that the constraints on coordinated economic liberalization lessened with domestic economic liberalization in many member states in the 1980s and 1990s. A broad convergence in domestic economic policies has rendered ambitious regional market building possible, as this argument suggests. It is also true that large increases in economic interdependence since the 1970s have enhanced general incentives for international economic cooperation. However, in the absence of converging *regional* incentives and strong interest group lobbying this argument is largely indeterminate regarding the specific institutional form of resulting cooperation. Figure 1 sketches trade interdependence—a widely used proxy for underlying economic incentives—across the four organizations in the five years prior to key decisions on the deepening of regional economic cooperation. It indicates that economic incentives are significantly lower in the three regions than they

were in Europe in the 1950s, a decade after a devastating war had destroyed these countries' economies.² Varying and, in absolute terms, comparatively low levels of trade interdependence in the three cases are difficult to reconcile with converging institutional choices of an EU-type. This assessment is shared in the secondary literature. In an analysis of economic regionalism in Asia and the Americas, Haggard (1997: 45) concludes that there is "little evidence for the theory that higher levels of interdependence generate the demand for deeper integration." In a similar vein, Draper (2012: 78) concludes in a recent review of economic integration in Africa that regional economic cooperation "does not hold nearly as much potential to overcome it [under-development] as integration with dynamic and large external markets."

Figure 1. Trade interdependence in four regional organizations



Source: Own elaboration on the basis of the Unu-Cris trade database: <http://www.cris.unu.edu/riks/web/data/customIndex>, measure on intraregional trade share; for the EU, data is from Eichengreen (2008) on the basis of IMF Direction of Trade Statistics, 1948-1980.

Moreover, interest groups did not lobby for this specific institutional form. In fact, such groups appear to have been either irrelevant or even opposed to the institutional choices in question. In a detailed historical study of the construction of Mercosur, Gardini (2006: 8) notes that these groups' "initial indifference shifted to reluctance and skepticism, especially in Argentina." Similar assessments dominate the literature on ASEAN. Process insiders such as the former Secretary-General Rodolfo Severino (2006: 249) state flatly, "governments feel no pressure from ASEAN business to move faster on regional economic integration." Other scholars find that business has "not been a strong pro-integration lobby" (Webber 2010: 327). In SADC, business interests are notable for their absence from the secondary literature; they are simply not mentioned. In general, proponents of this argument themselves admit its potential indeterminacy, as Mansfield and Solingen (2010: 155) note: "intraregional and extraregional bilateral, trilateral, and region-wide PTAs [preferential trade agreements] are compatible with internationalizing coalitions."

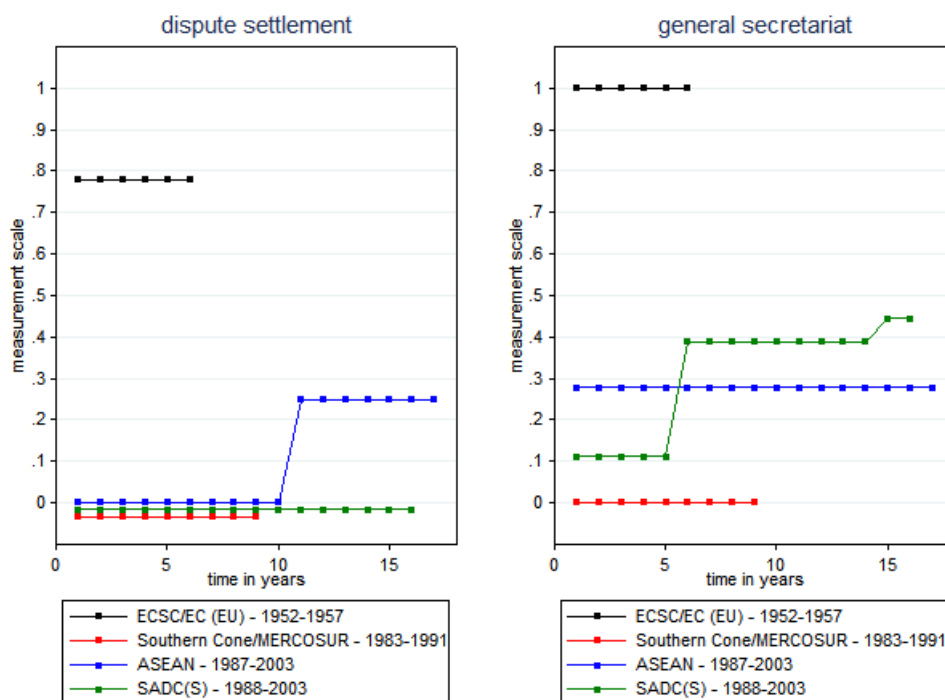
The second argument, advanced by Neofunctionalists, focuses on endogenous spill-over dynamics under conditions of technological progress and economic interdependence. It proposes that,

² The comparatively higher numbers of intra-regional trade in ASEAN are mainly due to Singapore's role as an entrepôt for intra- and extra-regional trade, which inflates the numbers (Ravenhill 2010: 182).

under certain conditions, processes of regional market building become more ambitious as a result of self-reinforcing dynamics associated with the functional connectedness of policy fields, as well as supranational entrepreneurship. In this account, supranational institutions with meaningful autonomous capacity play a key role in nourishing support for, and themselves pursuing integrative agendas towards, more ambitious forms of market building (Haas 1958; Stone Sweet and Sandholtz 1997). It follows that the ambition of regional market building grows with both economic interdependence and the existence of supranational entrepreneurs.

Again, this argument points to important prerequisites for market building in the form of growing incentives and declining constraints on international economic cooperation, but it is indeterminate regarding the specific institutional form resulting from it in the absence of supranational entrepreneurship. Structurally, the autonomy of institutions varies radically across the cases, and is rather limited outside of the EU. Figure 2 compares the autonomy of the two main regional institutions—dispute settlement mechanisms and general secretariats—in the five years leading up to key decisions on regional market building. Stronger dispute settlement mechanisms were created *following* key decisions on regional market building, especially in the Southern Cone/Mercosur and SADC. General secretariats are somewhat stronger, but their independence also varies widely across cases. Overall, this variation does not point towards converging institutional choices. The secondary literature bolsters this assessment. Unlike the 1992 programme in Europe (see Sandholtz and Zysman 1989), supranational institutions are far from being an important facilitator of negotiations for more ambitious economic cooperation in the other regions. The institutional choices examined in this paper are the result of a process of intergovernmental negotiations that, most observers concur, are largely monopolized by governments (see Tan 2013; Malamud 2005; Lee 2003; Ravenhill 2010).

Figure 2. Formal autonomy of selected regional institutions in four regional organizations



Source: Marks et al. 2016, partly based on own calculations on the basis of their coding scheme.

A third argument, inspired by Realism, emphasizes the role of hegemonic outside actors in imposing convergent institutional choice by manipulating target governments' opportunities and constraints, what Elkins and Simmons (2005) call 'hegemonic coordination'. Hegemons, or the international organizations through which they act, often advance particular institutional choices elsewhere in the pursuit of geostrategic or economic interests. Countries that are dependent on outside actors are particularly susceptible to this pressure.

This argument also provides insights into the question at hand. It is unquestionable that international financial institutions played an important role in advancing domestic economic liberalization through structural adjustment programmes in the 1980s, especially in the Southern Cone and Southern Africa (Haggard and Kaufman 1992; Teichman 2001). Again, this convergence in domestic economic policies was a necessary prerequisite for ambitious regional market building. However, hegemons did not impose a specific institutional form of international economic *cooperation*, which means that this argument is also indeterminate for the question at hand. In fact, international financial institutions were not only indifferent to cooperation beyond unilateral liberalization, they criticized regional organizations for undermining multilateral liberalization and for diverting trade (see Yeats 1998). Moreover, especially in the SADCC case, internationally imposed austerity measures put the continued viability of regional cooperation at risk. A 1987 Secretariat note warned that “the mounting difficulties for SADCC member states to meet their debt-service obligations” would make it difficult to “contract new debt for implementation of the Organisation’s Programme of Action” (SADCC Secretariat 1987: 70). Thus, these institutions’ actions were far from supporting the specific institutional form that ultimately emerged. On the other hand, the United States has operated mainly through a series of bilateral trade deals in the context of larger cross-regional frameworks such as Asia-Pacific Economic Cooperation or the Free Trade Agreement of the Americas. While these initiatives certainly facilitated coordinated economic liberalization, many observers agree that they have weakened rather than strengthened ambitious regional market building of the EU-type (for an overview, see Haggard 1997). The European Union is the only global power that supports such endeavours. However, many of the relevant decisions were taken *prior* to the EU’s direct engagement with them. With the potential exception of SADC, a case I discuss below, there is little evidence that pressure from the EU drove those decisions.

In conclusion, existing explanations of economic regionalism, and of international economic cooperation more broadly, conceive of converging institutional choices as the result of independent reactions to similar structural conditions, or of outside imposition. While all of these arguments provide insights into the changing incentives and constraints for international economic cooperation, they are largely indeterminate regarding the specific institutional form that such cooperation takes. Thus, the explanatory challenge is to account for the emergence of a specific institutional form of international economic cooperation—EU-type regional market building—across structurally diverse settings and in the absence of outside imposition. Below, I suggest that the mechanism of frame diffusion provides a plausible response to this challenge.

3 Frame diffusion: An alternative explanation

3.1 Frames and institutional choice

Frames are cognitive tools that help actors organize information in a complex environment. In his pioneering work on the topic, Goffmann (1974: 21) defines them as “schemas of interpretation” that help individuals “to locate, perceive, identify, and label” events. By serving as interpretive frameworks, they imbue these events with meaning, and thereby create shared understandings among actors that legitimate and motivate action. Frames have both a diagnostic and a prognostic element (see Snow and Benford 1988: 199-201). They allow actors to identify a problem in terms of its specific attributes and underlying causes (diagnostic framing), and they suggest solutions by specifying strategies to deal with it (prognostic framing). In so doing, frames emphasize certain aspects of a problem and de-emphasize others, thereby excluding alternative interpretations and solutions. As Entman (1993: 53) notes, frames affect outcomes “by selecting and highlighting some features of reality while omitting others.” In short, frames shape perceptions, and therefore action.

Frames affect institutional choice—the process by which governments select from among institutional alternatives in response to a new cooperation challenge (see Jupille et al. 2013: 4)—by providing a shared understanding of the underlying cooperation problem and by proposing a ‘suitable’ solution. Regarding the former, cooperation challenges are not obvious, or can simply be derived from underlying fundamentals. Many ‘objective’ problems are not addressed because they are not perceived as problems, or because no agreement on the necessity for political action can be found. For example,

the poor functioning of many organizations of economic cooperation is arguably a ‘real’ problem, but with surprisingly little political consequence (see Gray and Slapin 2012). Sociologists have long recognized that problems are constructed through cognitive and societal processes (Blumer 1971; Cohen et al. 1972). Constructivists similarly suggest that institutional choice requires “common knowledge concerning both the definition of the situation and an agreement about the underlying ‘rules of the game’ that enable them to engage in strategic bargaining in the first place” (Risse 2000: 2; similarly Johnston 2008: 13; Wendt 2001: 1023-24). Moreover, frames influence institutional choice by offering solutions to a given problem. In order to bargain successfully over institutional alternatives, governments need to have a sense of the range and broad contours of potential alternatives. This is not trivial. Functional theories of institutions have long been criticized for their exclusive focus on institutional demand, while downplaying the problem of institutional supply. As Weyland (2008: 289) notes, “Contrary to functionalist assumptions, problems do not bring forth their own solutions. It is often difficult to design a realistic, viable plan for addressing a difficulty.” Knowledge is central to understanding which institutional options are seen to exist, and which would be appropriate for solving the problem at hand (see Haas 1992). A common frame provides such knowledge. It thereby “convinces actors about the general contours of new arrangements” (Fligstein and Mara-Drita 1996: 3).

From this perspective, frames are important because they allow governments to find agreement on fundamentals, which constitutes a prerequisite for successful bargaining. This enabling function of frames is central to sociological work that emphasizes their potential for “consensus mobilization” (Klandermans 1984), and it also forms the core of recent work on international agreements, which argues that framing is a useful concept “to understand how such agreements become possible in the first place” (Charnysh et al. 2015: 345). Moreover, frames introduce bias into the bargaining process. By pointing towards certain types of solutions and discounting others, frames pre-configure, and limit, the choice options that are being considered in the subsequent bargaining situation. Recent work on international institutional choice shows empirically that actors “do not do a full search and comparison of the whole range of alternatives” (Jupille et al. 2013: 34). From a frames perspective, then, it is crucial to understand (1) where frames come from, (2) how they become salient in an institutional choice situation, and (3) what their specific content is. I discuss each of these issues in turn.

3.2 Frame diffusion as a source of convergence in institutional choice

In contrast to much of the existing literature’s focus on the endogenous origin of frames³, I argue that frames often spread between organizations, thereby leading to converging institutional choices across different structural contexts without being imposed. The diffusion literature’s distinct claim is that the choices of some actors systematically shape those of other actors, such that institutional choice is “characterized by interdependent, but uncoordinated, decision-making” across units of analysis (Elkins and Simmons 2005: 38). From a diffusion perspective, then, frames originate in one regional organization, and shape policymakers’ perceptions of underlying cooperation problems and appropriate solutions in other regional organizations. The basic intuition behind diffusion is simple: Political actors that encounter a novel cooperation situation do not seek to understand the problem and devise solutions from scratch, but look to other organizations’ experience in dealing with similar challenges. Sequence matters here. Early movers on a cooperation problem initially devise solutions that, especially if successful, germinate into institutional frames that subsequently affect institutional choices elsewhere (for a good overview, see Gilardi 2012). Frame diffusion, then, can be defined as the process by which a cognitive schema that originates in one organization shapes decision making over institutional choices in other organizations.

³ For an overview of endogenous accounts, see Tarrow (1992) and Bleich (2002). A recent review noted, “To date, few movement framing scholars have considered diffusion issues” (Benford and Snow 2000: 628).

Foreign frames are likely to become salient in a situation of institutional choice in (at least) one of two ways.⁴ First, rather than being actively imposed, frame diffusion can be the involuntary result of foreign economic policy decisions that generate negative externalities elsewhere. Put differently, it is more likely to occur when the institutional choices of “one government alter the conditions under which other governments base their decisions” (Elkins and Simmons 2005: 39). This pathway for diffusion conforms to the competition mechanism that highlights interdependent decision resulting from rivalry over the attraction of economic resources (Baccini and Dür 2012; Elkins et al. 2006; Simmons et al. 2006: 792-95). Mattli (1999) develops the competition argument in the context of economic cooperation. He argues that economic regionalism in the 1990s can be understood as a counter-reaction to the threat of trade, investment and aid diversion generated by deeper economic integration in Europe and North America. Yet, such competition arguments are often indeterminate regarding specific institutional choices. Competition generally constrains the range of institutional choices, but it seldom dictates a *specific* choice. Thinking about competition in terms of frame diffusion adds determinacy to these arguments. It suggests that policymakers often respond to the competition from other actors by adopting variants of their competitors’ choices themselves. The reason is that competitors’ choices anchor responses by invoking the underlying frame (on anchoring and policy diffusion, see Weyland 2005). In other words, competitors’ choices, through the negative externalities they produce, generate the cooperation problem for which a particular frame provides a solution. Similar institutional choices, then, are the result of analogous reasoning about underlying cooperation problems.

Second, frame diffusion can result from the ideational attractiveness that a frame possesses when governments struggle to react to a highly uncertain situation. In such situations, policymakers often battle to make sense not only of the underlying causes of a problem, but also to find suitable solutions (see van Hulst and Yanow 2016). In this vein, Ovodonko and Keohane (2012: 523) note that it is especially under conditions of informational scarcity that “proposed institutional designs must be widely acceptable.” And Nelson and Katzenstein (2014: 362) point to the role of social conventions—which is akin to the concept of frames employed here—in crisis situations that “simplify uncertain situations by enabling agents to impose classification schemas on the world.” This pathway for diffusion is akin to the mechanism of emulation that is central to sociological approaches to diffusion. Meyerian world polity theory, in particular, highlights the adoption of global cultural scripts—templates that identify appropriate means in pursuit of legitimate ends—in the absence of detailed means-ends assessments (Meyer and Rowan 1977). Emulation emphasizes the willingness of actors to copy successful exemplars and sociocultural reference groups. DiMaggio and Powell’s notion of ‘mimetic isomorphism’ captures the idea that “organizations tend to model themselves after similar organizations in their field that they perceive to be more legitimate or successful”, a type of behaviour that is particularly likely in situations of uncertainty (DiMaggio and Powell 1983: 152, 156; similarly Johnston 2008: chapter 2). Here again, the notion of frame diffusion points to analogous reasoning: when the cooperation challenge an actor faces is akin to the problem diagnosis specified by a particular frame, the adopted solution is likely to be similar also if the frame guides the response. Given that frames tend to emerge from successful experiences of institutional choice, they provide legitimacy when reacting to uncertain situations. As a result, similar institutional choices might be the result of negotiated reactions to situations of uncertainty that are based on the same frame.

Frame diffusion can be *gradual*, thereby only leading to institutional convergence over time. Frames are complex structures of related but formally independent elements that can diffuse separately. As van Hulst and Yanow (2016: 94) put it, “the frame’s ‘basic’ components are capable of being itemized.” Below, I distinguish between two ‘levels’ in a frame’s prognostic element: the basic suggested solution, referring to the broad contours of an institutional choice, and its specific suggested solution, referring to the specific institutional form it proposes. In this vein, governments might share a frame’s definition of a problem, but only adopt the frame’s basic remedy to deal with it. However, as

⁴ While identifying the scope conditions of a mechanism is a worthwhile endeavor, mechanism-based explanations do not hinge on fully knowing them. Mechanisms are valuable parts of an explanation in and of themselves (Falleti and Lynch 2009).

choice situations recur and the same frame guides negotiations, a frame's specific prognostic elements tend to be adopted increasingly wholesale. Moreover, other frames that address a similar problem are likely to emerge over time. To the extent that a new frame's diagnostic and basic prognostic elements are similar to those of the original frame, the original frame's 'message' is being reinforced. The existence of complementary frames might lead to the emergence of a master frame that is "wider in scope and influence" (Benford 2013: 2). Processes of theorization—the "specification of abstract categories and the formulation of patterned relationships such as chains of cause and effect" (Strang and Meyer 1993: 492)—further reinforce these temporal dynamics. Theorization involves a variety of actors and renders frame diffusion increasingly independent of the specific action and fate of the originating institution because theorized cause-effect relationships become part of the stock of general knowledge, and therefore assume a taken-for-granted character. As a result, "the theorization of innovative practices expands their diffusion potential" (Strang and Meyer 1993: 497).

3.3 The common market frame, and related frames

What is the structure and content of the frames under investigation? The 'old' common market frame emerged in the early days of European integration, and was subsequently re-interpreted by policymakers in Latin America and Africa. Dominating the debate on regional economic cooperation until the 1980s, it conceived ambitious regional market building as an appropriate response to the security dilemma emerging from differences in power between neighbouring states as well as the problem of under-development. In the 1980s, the content of this frame shifted. Initiated by the Single European Act in 1986 and its so-called 1992 programme, the emphasis on peace was replaced by an emphasis on economic competitiveness as the main rationale to engage in ambitious market building. Related frames have largely reinforced this 'new' common market frame's message of regional economic cooperation as a solution to structural changes in the world economy. Table 2 summarizes the content and structure of the relevant frames.

At the beginning of European integration, the main cooperation challenge facing (West) European states quickly came to be seen as avoiding a resurgence of German hegemony, the country that had been pivotal in initiating two large-scale conflicts in the first half of the 20th century. Binding Germany into a gradual process of economic cooperation was seen as the most promising solution to the dilemma of preventive war (see Eilstrup-Sangiovanni and Verdier 2005). The first step in this approach was to establish joint control over the crucial war resources of coal and steel (European Coal and Steel Community), followed by the integration of nuclear energy (Euratom) and the establishment of a common market and customs union (European Economic Community) (for an analysis, see E. B. Haas 1958). Structurally, this frame excluded other interpretations of the cooperation challenge, and other remedies. For example, other countries could have reacted with punitive measures against a temporarily weakened Germany, or they could have sought to balance against Germany with the help of the United States. They could have also envisaged a shallower and functionally less inclusive economic agreement—a free trade agreement in goods, for example—that could have taken different forms: a bilateral agreement between France and Germany, a plurilateral agreement in the wider context of the Organization for European Economic Cooperation, or even multilateral cooperation in the context of GATT as the main venue for German integration (see Eilstrup-Sangiovanni and Verdier 2005: 104-111). Overall, the common market frame was geographically more limited and functionally more inclusive than potential alternatives.

This frame was quickly theorized and, ultimately, normalized. Economists such as Bela Balassa (1961) depicted the European experience of economic cooperation as the 'natural' evolution of economic cooperation from preferential trading arrangements via a free trade area towards a common market and ultimately an economic and monetary union. Abstracting from the specific European experience, theorization documented "the many virtues involved [in ambitious regional market building], in terms of standardized notions of efficiency [...] or progress" (Strang and Meyer 1993: 497). Such theorization facilitated the process of re-interpreting the common market frame. Theorists and policymakers in Latin America and Africa imbued the frame with a different rationale, rendering it as a solution to the problem of under-development and economic dependence. The creation of common markets was intended as a tool to enhance regional self-reliance through the

creation of larger, yet highly protected markets among developing countries that pursued import-substitution policies. The Economic Commission for Latin America and its Executive Secretary Raul Prebisch played a particularly important role in this effort, which shifted the focus away from “the European concern with European integration as a means to avoid war towards an approach whereby regional economic cooperation/integration was considered a means for economic development” (Söderbaum 2016: 24). Once again, this rendering excluded alternative solutions to the problem of under-development, such as the more liberal policies that came to be adopted in later periods.

Table 2. Content and structure of relevant frames

Frame	Diagnosis of problem	Suggested solutions
‘Old’ common market frame (1960s/70s)	Economic cooperation as a solution to preventive war and under-development	<ul style="list-style-type: none"> • Basic: emphasizes regional over bilateral, plurilateral and multilateral economic cooperation • Specific: emphasizes common market and customs union over free trade agreement
‘New’ common market frame (1980s/1990s)	Economic cooperation as a solution to challenges in international competitiveness	<ul style="list-style-type: none"> • Basic: emphasizes regional over bilateral, plurilateral and multilateral economic cooperation • Specific: emphasizes common market over free trade agreement
NAFTA frame (1990s)	Economic cooperation as a solution to challenges in international competitiveness	<ul style="list-style-type: none"> • Basic: emphasizes regional over multilateral economic cooperation • Specific: emphasizes free trade agreement over common market
“Open regionalism” master frame (1990s)	Economic cooperation as a solution to the challenges of globalization	Emphasizes regional over multilateral economic cooperation, but suggests they are compatible

The ‘old’ common market frame changed fundamentally in the 1980s, with Europe’s Single Market programme acting as the catalyst. European policymakers recast it by pitching ambitious regional market building as a “solution to the problem of Europe’s lack of competitiveness” (Fligstein and Mara-Drita 1996: 12). In the early 1980s, many West European countries found themselves in continued stagflation following two oil price shocks. In this situation, European Commission officials, with the support of European industrialists, presented ambitious market building as an appropriate response to “the challenge of a globalizing world economy and growing international competition” (Green Cowles 1995: 523; see also Sandholtz and Zysman 1989). The Commission’s White Paper of June 1985 marked a milestone in this respect. It laid out not only a programme and a timetable for the completion of the common market, the so-called 1992 programme, but also provided the basic

rationale, arguing that it is through the elimination of barriers to trade “that the Community will give the large market its economic and industrial dimension by enabling industries to make economies of scale and therefore to become more competitive.” The competitiveness theme is omnipresent in justifications of the initiative (for quotes, see Green Cowles 1995). Thus, the ‘new’ frame redirected the purpose of the common market from an inward-oriented solution to regional security dilemmas and under-development towards an outward-oriented solution to increasing international competition. Once again, enhanced regional market building emphasized one set of solutions to other alternatives, such as purely national strategies, or closer links with Japan, the emerging competitor (Sandholtz and Zysman 1989: 106). It biased emphasis.

A frame emerging in North America—the North American Free Trade Area (NAFTA), which was the extension of the 1988 Canada-US Free Trade Agreement to Mexico in 1992—soon buttressed the re-purposed common market frame. Even though often seen as antidotes, I suggest that the NAFTA frame reinforced the common market frame in two main respects. First, the basic rationale for regional market building is similar in both frames. NAFTA negotiators regularly justified their initiative by the need to respond to competitive challenges resulting from structural changes in the world economy. For example, the US administration framed NAFTA as “crucial to a more efficient, competitive, and export-oriented economy” (Milner 1995: 348; see also Cameron and Tomlin 2001: 62ff.). NAFTA was designed “to increase trading opportunities and encourage foreign direct investment among its parties” (Abbott 2000: 528). Second, NAFTA also reinforced the basic prognostic element of the ‘new’ common market frame in that it emphasized economic cooperation in the regional context.⁵ In fact, observers were soon concerned that the architect and major supporter of the post-war multilateral trading system was turning away from multilateralism (Bhagwati 1993). However, the NAFTA frame differs from the common market frame in its ambition. Whereas a common market seeks to achieve the free movement of goods, services, capital and labour, a free trade agreement aims to liberalize (but not necessarily to free completely) trade in specific sectors, usually encompassing goods and services (and increasingly also rules on investment). The latter is thus more limited in functional scope.

These similar institutional choices made by two major players in the world economy gave rise to the theorization of a master frame on economic regionalism in the 1990s. It is succinctly captured by the notion of “open regionalism”: regional economic cooperation is conceived as an appropriate response to the myriad challenges associated with globalization. This frame not only broadened the rationale for economic regionalism, pitching it as an appropriate response to the all-encompassing challenge of globalization. It also mitigated emerging fears that economic regionalism would undermine multilateral economic cooperation (for a detailed analysis, see Bergsten 1997).

3.4 Observable implications

What type of empirical evidence would corroborate this argument about frame diffusion? Framing arguments, as other arguments about cognitive processes, are difficult to verify conclusively with observational data because they capture the mental processes of actors that are difficult to tap directly. Nevertheless, following many qualitative studies on frames, such arguments can be made plausible by tapping frame diffusion indirectly, through its observable implications, i.e. pieces of “evidence that should be found if the account is true” (Bennett and Elman 2006: 460). Even though not all of them are distinct from those suggested by alternative arguments, taken together they nevertheless “form a ‘signature’ that is quite unique” (Beach and Pedersen 2016: 18). In particular, existing arguments would generally expect more serious consideration of potential alternative institutional choices and more controversial politics underlying such decisions. Without the consensus mobilization function of frames, for example, we would expect competing lobby groups, or interests more generally, to struggle

⁵ NAFTA is primarily an alternative to multilateral cooperation, and less so than the common market frame to bilateral and plurilateral schemes. It has its origin in the bilateral agreement between Canada and the US, and is at the heart of several broader plurilateral initiatives, such as the Free Trade Agreement of the Americas, and the Asia-Pacific Economic Cooperation.

fiercely over alternative solutions to a cooperation problem. Observable implications concern three dimensions of the process of institutional choice.

1. *Timing*: Institutional choice tracks decisions by important trade and development partners that are likely to produce negative externalities, or an exogenous situation of high uncertainty. This should also be reflected in the verbal justifications of an initiative. We operationalize high uncertainty as a crisis situation that, in the perception of policymakers themselves, threatens the continued viability of the entire organization.

2. *Process*: Ensuing debate reflects a frame's diagnostic and prognostic elements, and makes reference to the organization from which it emerged. Policymakers quickly agree on the nature of the underlying cooperation problem, in line with the prognostic element of the frame in question; alternative ways to understand the problem are not considered. On that basis, the range of potential institutional choices that is being considered is narrow; there is little controversy over the general direction of required institutional choice, which allows for relatively smooth decisionmaking. Verbal justifications that use the originating frame's language may use the language of inevitability and 'obviousness', or conceive an institutional choice as the 'logical next step.' Epistemic networks linked to the 'framing' organization are involved in institutional debate.

3. *Outcome*: The resulting institutional choice reflects the frame's prognostic element, often worded in language very similar to that used in the 'framing' organization. To outside observers, the decision might appear surprising in view of member states' divergent structural positions. As situations of institutional choice recur over time, the institutional choice approximates more closely the original frame's proposed solution.

4 Empirics: Institutional choice and the gradual diffusion of the EU common market frame

Drawing on interviews, primary documents and secondary sources, this section seeks to demonstrate the plausibility of the frame diffusion argument regarding key institutional choices of economic cooperation in ASEAN, the Southern Cone/Mercosur and SADC. I argue that it was primarily the 'new' common market frame, and related frames, that affected negotiations over institutional choices in economic cooperation at critical junctures, thereby rendering possible the gradual institutional convergence on an ambitious EU-type common market model. I consider the three organizations in turn, starting with Mercosur and its predecessor in the Southern Cone.

4.1 Southern Cone / Mercosur

Mercosur has its roots in the gradual rapprochement between Argentina and Brazil that started in the late 1970s during these countries' transitions to democracy. In the early 1980s, cooperation was focused on security issues, involving the coordination of nuclear energy programmes, and some limited commercial accords concerning double taxation and mutual investment. In 1986, the two governments concluded a programme of cooperation that sought voluntary and gradual trade liberalization on a sectoral basis; yet negotiations quickly "reached a standstill" (Manzetti 1990: 110).⁶ Not surprisingly, expert assessments of the 1986 programme are rather negative (for example, Manzetti 1990). If the two countries were unable to make even rather modest forms of economic cooperation succeed, how did it become possible that they soon opted for a much more ambitious form of regional market building?

First transformative choice. The *timing* of the new initiative in early 1988 tracks the culmination of an economic crisis that resulted from increasingly divergent macroeconomic policies to promote economic stabilization related to the Latin American foreign debt crisis. To many observers, this crisis put at risk the viability of initial efforts at economic cooperation between Argentina and Brazil (Bouzas 1990; Gardini 2010: 79). For Argentinean President Alfonsín, for example, continued economic cooperation "was the only option for Brazil and Argentina to find a way out of the economic crisis" (cited in Gardini 2010: 78). The initiative also coincided with the launch of Europe's 1992 programme, as well as the conclusion of CUFTA negotiations in 1987. Some observers regard this as

⁶ Uruguay joined the bilateral cooperation efforts in April 1988 with the Act of Alvorada (Manzetti 1990: 119).

another impetus to the initiative. Gardini (2010: 55) notes, for example, that “decision makers in the two countries sensed that the world was moving toward a process of competition between cohesive trade areas”, which was triggered primarily by the observation that “the European Community launched a process of strong consolidation.” Yet, the extent to which these changes would really generate negative externalities for the participating countries was still largely unknown.

It was this ‘sensing’ that led the *process* of subsequent debate and negotiation to revolve primarily around the ‘new’ common market frame. Engaging in ambitious market building was seen as a way to position the two countries in a changing world economy and it was hoped that “the Argentina-Brazil scheme, with its enlarged market, [would] attract potential investors” (Gardini 2010: 78). Nevertheless, the ‘old’ common market frame was also present. Since its beginnings in the early 1980s, bilateral cooperation in the Southern Cone had relied on the idea that regional market building was an appropriate response to security dilemmas between neighboring states. The earlier Economic Cooperation and Integration Programme was modeled on the European Coal and Steel Community as an attempt to help Argentina and Brazil overcome their long-standing rivalries (Botto 2009: 176). Moreover, the common market idea has a long pedigree in Latin America, which reaches back to the creation of the Latin American Free Trade Association in 1960 when, under the intellectual leadership of the United Nations Economic Commission for Latin America, ambitious market building came to be seen as a solution to the problem of under-development (Campbell et al. 1999: 56-57). In the 1980s, this remained a problem for both countries. The common market frame, both ‘old’ and ‘new’, suggested to policymakers that this wide variety of cooperation challenges could be addressed with the same institutional solution: the creation of a common market. This was despite the fact that the Latin American experience in establishing a common market had been largely a failure (Campbell et al. 1999: 57-60). Policymakers repeatedly expressed their belief that “the achievement of the common market was a dream for both countries” (cited in Gardini 2010: 82). Working towards a common goal in a highly volatile and uncertain situation facilitated decisionmaking. There was no controversy over the general direction of what ought to be done in this ill-defined situation, as the Alfonsín quote above indicates. In fact, plausible alternatives to the basic institutional choice of ‘regional’ economic cooperation—enhanced plurilateral cooperation in the context of the Latin American Free Trade Area, or a primary focus on the incipient Uruguay Round of the GATT—were not seriously considered. Working towards the creation of a common market seemed like the ‘obvious’ choice in view of the underlying frame. During the technical preparations for the treaty, however, policymakers realized, following a visit to North America to also study CUFTA, that it appeared more prudent to deepen the process gradually and start with a free trade agreement rather than jump towards an EU-style common market right away (Gardini 2010: 82).

Thus, the final *outcome* of this process was the conclusion, in November 1988, of the Treaty of Integration, Cooperation and Development, which aimed to create a free trade area within ten years through the gradual removal of tariff and non-tariff barriers on goods and services. Nevertheless, the treaty explicitly laid the foundations for the adoption of an EU-type common market model in the future. It mentions the creation of a ‘common market’ as a long-term ambition (Art. 5), and envisions the harmonisation of a series of flanking policies such as agriculture and transport as well as the coordination of monetary, fiscal and exchange rate policies (Arts. 3 and 4) and the gradual harmonisation of policies ‘related to human resources’ (Art. 5). Negotiation histories show that even a common external tariff was provided for in draft treaty texts, and later eliminated (Gardini 2010: 82). Yet, the long-term ambition to create an EU-type common market became reality only three years later with the foundation of Mercosur. How did this more ambitious form of regional market building become possible in such a short period of time?

Second transformative choice. This time around, the *timing* of renewed attention to institutional choice closely tracked decisions by important trade and investment partners, especially the EU and the US, that were likely to generate negative externalities. The movement towards completing the Single Market in Europe had gathered pace, and early studies warned of the potential for trade and investment diversion away from Latin America (for example, Hufbauer 1990). Moreover, in June 1990, Mexican President Salinas requested formally to join the Canada-US Free Trade Agreement. Strikingly, it was in the following month, in July 1990, that Menem and Collor

signed the Act of Buenos Aires envisaging the creation of an EU-type common market. Not surprisingly, policymakers in the region conceptualized the underlying cooperation challenge as competition from other economic blocs. Most obviously, the preamble of the Treaty of Asunción justifies Mercosur's creation by "international trends, particularly the integration of large economic areas." As Mattli (1999: 155) argues, the creation of Mercosur can be understood as "an effort to reverse a decade of economic decline and to fend off the negative externalities of bloc formation elsewhere."

The *process* of subsequent debate and negotiation was based on the 'new' common market frame, which EU policymakers had developed a couple of years earlier. Justifications for the initiative emulated much of the rhetoric of the EU's 1992 programme, or made direct reference to it. A high level representative announced in 1990 that the EU, with its 1992 project, appeared "stronger and more radiant than ever, and much less dependent on the outside world" (cited in Vasconcelos 2007: 167). Other policymakers viewed ambitious regional market building along EU lines as "an assertive instrument of competitiveness" (Gardini 2010: 87). Interviews with policymakers directly involved in the negotiations similarly indicate the underlying 'new' common market frame developed in the EU. Former Brazilian Foreign Minister Luiz Felipe Lampreia recalls of the negotiations, for example, that "reference to the EU was constant" (Interview with the author). And, alluding to the 'old' common market frame, one Argentinean policymaker states: "there was a predominant sense of identification with the EU 'community' approach to economic integration, as opposed to the more 'market-oriented' models of NAFTA and the FTAA [Free Trade Area of the Americas]" (cited in Lenz 2012: 161). In line with a framing argument, interviews also indicate that there was no debate about potential alternative institutional choices, and also little controversy over the general direction of envisaged institutional choice. One policymaker recalls: "If we go to the documents or to the minutes of the discussions between Brazil and Argentina, nowhere can you find a very detailed study concerning the technicalities of a customs union or a common market. You just have political enthusiasm" (Interview with Brazilian negotiator; see also Botto 2009: 176). Another mentioned along similar lines: "We wanted to set the four countries on a path of regional integration, but we had little experience in how to do that. ... We had good intentions, but lacked the knowledge on many specific issues" (Interview with Argentinean negotiator).

Thus, the final *outcome* of this process was the adoption of an EU-type common market model, including the element of the customs union. The recurrence of a choice situation had thus led to a fuller approximation of the frames' proposed solution, which had already been mentioned in the 1988 agreement. The preamble of the Act of Buenos Aires explicitly describes this goal being "in conformity with the provisions of the Treaty on Integration, Cooperation and Development." Treaty language in the Mercosur agreement draws heavily on that used in Europe. It formulates the ambition to ensure the "free circulation of goods, services and factors of production" by pursuing the "elimination of customs rights and non-tariff barriers", the establishment of a common external tariff and the "adoption of a common commercial policy" as well as the "coordination of macroeconomic and sectoral policies" (Art. 1). More specifically even, it outlines a replication of the 'classical' European integration experience of economic integration as a step-wise process evolving from an FTA through the establishment of a customs union towards a common market, as economists such as Bela Balassa and others had theorized it. In retrospect, some policymakers, such as former Brazilian foreign minister Lampreia, mentioned that "it was a mistake to emulate the EU integration model" (Interview with the author). In sum, both the 'old' and, in more recent periods, primarily the 'new' common market frame guided policymakers in the Southern Cone/Mercosur towards specific decisions of institutional choice at critical junctures, and thereby made the eventual adoption of an EU-type common market and customs union possible.

4.2 Association of Southeast Asian Nations

ASEAN is a regional organization in Southeast Asia that was founded in 1967 by five states: Indonesia, Malaysia, Philippines, Singapore, and Thailand. It shares with cooperation in the Southern Cone that it was initially restricted to functional coordination in selected policy areas. Foreign policy coordination dominated the first decade, selective and highly circumscribed economic cooperation

focusing on preferential trading and industrial complementation the second (a good overview is Ravenhill 1995). Still in the late 1980s, ambitious market building was not considered, as a former Secretary-General notes: “there was no thought at that time about regional market integration or about the need to attract foreign investments through an integrated regional market” (Severino 2006: 213). How did policymakers come to think about, seriously consider, and eventually even adopt regional market integration with the ASEAN Free Trade Agreement (AFTA) only a few years later?

First transformative choice. As in the case of the second transformative choice in the Southern Cone, the *timing* of the initiative clearly tracks regional initiatives in Europe and North America that sparked fears of negative externalities for the region. Debates on AFTA started in the early 1990s, once important voices in the region started to warn of an emerging ‘Fortress Europe.’ The *Asian Business* magazine, for example, featured a cover story in 1989 entitled ‘United Europe: The Threat to Asia’ (Vol. 25, pp. 34-41). Consequently, the July 1990 Ministerial Meeting announced that it was “cognizant of the urgent need for ASEAN to cope with the rapid and dramatic developments taking place not only in Europe but also in the region [APEC]” (ASEAN Ministerial Meeting 1990). And the Economic Ministers meeting a few months later discussed the challenges stemming from the European Single Market (ASEAN Economic Ministers 1990). By late 1990, agreement had formed among governments that action was required, but what should it look like?

The ensuing *process* of debate readily linked the diagnosis of enhanced competition from other parts of the world to enhanced intra-ASEAN economic cooperation—a link that was established in the ‘new’ common market and emerging NAFTA frame. Other potentially viable choices—for example, penetrating the United States (and Japanese) market through the incipient and economically more promising Asia-Pacific Economic Cooperation (see Mattli 1999: 170-76), seeking bilateral trade ties with Europe, or enhancing efforts in the Uruguay round of the GATT (see Baccini and Dür 2012: 64)—were not even considered.⁷ Instead, it was taken for granted, in line with the underlying frames, that developments in other regions created an urgent “need to take concrete steps towards more effective intra-ASEAN economic cooperation” (ASEAN Ministerial Meeting 1990). As Khong and Nesadurai (2007: 51-52) summarize, “extensive analyses undertaken by European and North American economists and policy analysts on the implications of the impending North American Free Trade Agreement (NAFTA) and the Single European Market (SEM) for other countries and regions [...] were keenly followed in ASEAN, and helped persuade ASEAN officials that the problem of FDI diversion would be the major fallout of the turn to regionalism in North America and Western Europe, and that a similar regional project in ASEAN would be the *appropriate policy response*” (my emphasis). As a result, verbal justifications of the initiative are almost identical to those used in Europe and North America around that period. Consider Thai prime minister Anand Panyarachun’s public justification of the initiative: “Besides freer flow of trade, AFTA would lead to a larger ASEAN market of 360 million people which would surely be more attractive for investments [...] than six separate markets. With economy of scale, this would also lead to a rational allocation of resources and increased efficiency in production. ASEAN would be in much better position to attract investment as goods would be produced more economically” (Meeting of the ASEAN Heads of Government 1992: 27).

These underlying frames were also reflected in two concrete proposals that served as the basis for the final bargain. The first one was a Philippine proposal, which suggested an ambitious and legally binding “ASEAN Treaty on Economic Cooperation” to form part of a wider “cohesive and juridical regional group similar to the European Community” (Severino 2006: 15-16). The second, more modest proposal came from a group of regional and European economic experts and sought to transfer lessons from the EU to ASEAN (Naya and Plummer 1997: 120). Aware of member states’ continued reluctance to engage in ambitious trade liberalization, the group proposed a tiered approach that would start with the immediate creation of an FTA-Plus and would codify the adoption of a Framework Agreement to create an ASEAN Economic Community as a longer-term goal (Naya et al.

⁷ The first study that *did* consider these alternatives was published several years *after* the decision had been taken (Means 1995).

1992), a proposed choice similar to that of Argentina and Brazil in their 1988 Treaty of Integration, Cooperation and Development.

The eventual *outcome* of this process was the adoption of AFTA at the Singapore Summit in January 1992. It largely followed the latter proposal by outlining a detailed plan for across-the-board tariff reductions, and by containing mention of elements of deeper cooperation such as the elimination of non-tariff barriers to trade, the “harmonisation of standards” and the “reciprocal recognition of tests and certification of products.” This was surprising insofar as only a few years earlier, member states had vigorously rejected an FTA, which apparently evoked fears of a fledging European Community (Naya and Plummer 1997: 118). At the signing ceremony, Malaysian Prime Minister Mahathir Mohamad defended the new treaty with direct reference to Europe: the “movement towards a free trade arrangement is not as big a change as a single European Market, but for us, it is significant” (cited in Kurus 1995: 414).

Second transformative choice. Another step-change in integration took place with the Bali Concord II, in 2003, which provided for the creation of an EU-type common market. According to most observers, the *timing* of the new initiative is associated with two major events. The first is the Asian financial crisis, which started in July 1997 with the collapse of the Thai currency and questioned ASEAN’s continued viability. Both policymakers themselves and outside observers shared the perception that it had “shattered ASEAN’s credibility as a regional leader and an economic regime, and ... cast doubt on its viability as a regional institution in a globalizing world” (Narine 2002: 139; politicians are cited in Funston 1999: 205-06). In this situation, decisive steps in deepening economic integration were perceived to be required to ensure ASEAN’s “continuing relevance”, as an Eminent Persons Group (EPG) argued in 2000 (Eminent Persons Group 2000: 7). This general uncertainty was further bolstered by the realization of governments that the growing economic strength of China and India required a joint response. It was increasingly seen as a threat to the region’s countries in terms of their attractiveness for foreign direct investment.

The ensuing *process* of debate was guided primarily by the ‘new’ common market frame, which allowed policymakers to find consensus on more ambitious regional market building than the previous FTA within only a few years. At the opening of the Economic Minister’s meeting in October 1997, a few months after the beginning of the financial crisis, Mahathir called for a “long-term vision” and suggested setting “our sights to be a single market and an economic union *à la* the EU” (*Manila Standard*, 16 October 1997). The proposal followed a meeting between ASEAN and European finance ministers at which the latter had articulated their conviction that currency speculation had been reined in in the early 1990s as a result of closer economic and financial integration (*The Nation* (Thailand), 24 October 1997). In December 1997, the Heads of State adopted Mahathir’s proposed vision: the ASEAN Vision 2020 for the first time mentioned the idea of a common market in an official ASEAN document. The smoothness with which consensus formed on this long-term objective—only a few months passed between the start of the crisis and this decision—is striking, given the fact that well-founded proposals on how to react to the crisis were only emerging at the time, and they emphasised the need for reforms of domestic financial systems in order to improve transparency and the creation of wider regional institutions for financial supervision that were not confined to ASEAN (see Woo Wing Thye 2001). It suggests that the salience of the ‘new’ common market frame in a situation of high uncertainty made it possible for diverse actors to find agreement on the underlying cooperation problem and an appropriate institutional solution. To them, it appeared “obvious” that decisive steps in deepening economic integration were required, as stated in an Eminent Persons Group (2000: 7) report on the Vision 2020.

The turn towards institutionalizing this long-term goal, and making it consequential for political decisionmaking, occurred in the early 2000s amidst rising realization of China’s and India’s economic rise. In 2001, the economic ministers commissioned an expert study to identify ways to regain ASEAN’s competitiveness (ASEAN Economic Ministers 2001, section 12; 2002, section 8, respectively). Conducted by a team of European consultants from McKinsey, the study recommended a “step-change” in integration (Schwarz and Villinger 2004). It firmly anchored the ‘new’ common market frame with policymakers and facilitated smooth decisionmaking. At the Summit in 2002, Singaporean prime minister Chok Tong Goh (2002) captured the forming consensus that the “general

way forward” lay in “faster and deeper integration”, and he suggested the formation of an ASEAN Economic Community, “not unlike the European Economic Community of the 1950s.”

The eventual *outcome* of this process was the Bali Concord II, adopted in October 2003, that formulated the ambition to establish an ASEAN Economic Community (AEC) as “the realisation of the end-goal of economic integration as outlined in the ASEAN Vision 2020” aimed at establishing ASEAN as a “single market and production base” (ASEAN Summit 2003, section B1). The High Level Task Force on economic integration, whose recommendations were attached to the document, described this goal as involving the “free flow of goods, services, investment, and skilled labour, and freer flow of capital.” This recommendation became official policy in the Vientiane Action Programme that was adopted a year later, and was justified—in accordance with the ‘new’ common market frame’s prognostic element—as “enhancing competitiveness for economic growth and development through closer economic integration.” In sum, transformative decisions on market building in ASEAN have been guided, above all, by the ‘new’ common market and NAFTA frames, both of which depict ambitious regional market building as a solution to the problem of international competition and competitiveness.

4.3 Southern African Development Community

In 1981, nine so-called Frontline States created the Southern African Development Cooperation Conference, the direct predecessor to SADC. With the support of international donors, they sought to coordinate national development plans across a range of functional sectors in an attempt to lessen dependence on South Africa’s Apartheid regime (Anglin 1983: 700-708). Akin to both the Southern Cone countries and ASEAN, economic cooperation played a marginal role initially, and remained highly circumscribed when, in the late 1980s, some initiatives in that direction—an investment programme and several projects promoting trade—were taken. Nevertheless, cooperation was still based largely on the organization’s founding ‘ethos’ as expressed by Seretse Khama, one of the organization’s founding fathers: “The basis of our co-operation [is] built on concrete projects and specific programmes rather than grandiose schemes and massive bureaucratic institutions” (SADCC 1980: 19). How did policymakers come to consider, and eventually adopt, such ‘grandiose’ market building schemes only a few years later?

First transformative choice. Debate about a step-change in economic cooperation began in the late 1980s. Its *timing* is related to the high uncertainty that followed at a moment of major geostrategic change, in view of the organization’s high dependence on external donors, which funded about 90 percent of its budget at the time. As Southern Africa appeared to lose its geostrategic importance towards the end of the Cold War and donors reconsidered their financial support, the continued viability of the organization was put into question. In fact, many countries of the quickly dissolving Soviet Bloc withdrew their contributions and the European Community, the most important remaining donor, voiced increasing dissatisfaction with SADCC’s poor disbursement rates of Community funds (Council Records, July 1988 (Vol. 1): 95). This led the Community in the early 1990s to consider redistributing financial support away from the organization. A SADCC Secretariat document noted worryingly: “On all accounts, if [this] EEC position is sustained, the SADCC Programme will suffer enormously from a reduced regional allocation” (SADCC Secretariat 1991b: 51). At the same time, policymakers perceived the ‘challenge’ stemming from the formation of regional blocs elsewhere. For example, Zimbabwean President Mugabe noted at the 1989 Summit: “the 1990s also offer new challenges as other sub-regions ... move closer together in their integrative efforts, for example, the European single market by 1992, and the US-Canada Free Trade Agreement” (SADCC Summit Record, August 1989: 21).

The ensuing *process* of debate quickly revolved around the ‘new’ frames of regional economic cooperation in the EU and North America. It was without much serious discussion that these challenges were linked to regional market building. As a Secretariat document in 1991 flatly notes: “In the face of the region’s realities, and the current international tendencies toward the establishment of economic blocks, the region must accept to transform itself into an economic block similar to the proposed North American free trade zone or the European Economic Community” (SADCC Secretariat 1991a: 361). This cognitive frame is also reflected in a statement by Botswana’s president

a few years earlier, which linked Europe's challenges in relation to competitiveness, addressed by the Single European Act, to the situation in Southern Africa: "We understand that the single European Act of 1987 will come into effect soon... If the Europeans need this kind of economic cooperation, we must need it even more" (SADCC Summit Record, July 1988: 33). Empirical research on the decision-making process suggests that there was no debate regarding the benefits and drawbacks of different institutional choices, "policymakers felt that steps towards regional economic integration were necessary [...] in view of the decisive moves towards regionalism in other parts of the world" (Lenz 2012: 162-63). Even the specific institutional choices of the EU and the NAFTA frames—a common market and an FTA—were not subject to serious study. Without any serious assessment, the 1991 Council concluded that the new framework for regional integration must provide "for crossborder investment, trade and labour and capital flow across national boundaries" (SADCC Council of Ministers 1991: 16), and Zimbabwean President Robert Mugabe spoke at the Summit of the "facilitation of movement of peoples, goods and services" and "greater cooperation in fiscal and monetary affairs" (SADCC Summit 1991: 53).

More so than in the other two cases, technical experts from the EU shaped this institutional choice. According to interviews and the primary record, they were involved in a series of expert studies that reinforced the emerging consensus on ambitious regional market building. Such groups asserted that a "stronger emphasis should be given on [*sic*] the objective of achieving economic integration" (Malima et al. 1991: 375). They directly assisted in the elaboration of the theme document for the 1992 Consultative Conference, which crafted a justification for the emerging consensus to create a "single regional market" (see SADCC Secretariat 1992: 29). Moreover, an EU-paid European lawyer assisted in drafting the Windhoek Treaty, which codified the EU-type common market objective (Interview with Stephen Kokerai).

The ultimate *outcome*, then, was the codification of the ambition for an EU-type common market in the 1992 Windhoek Treaty. Drawing on language of the Treaty of Rome, it stipulated the goal as follows: "the progressive elimination of obstacles of the free movement of capital and labour, goods and services, and of the peoples of the region generally" (Art 5[2]). It also identified a list of policies to be coordinated, which was almost identical with that of the Treaty of Rome (Interview with Stephen Kokerai). This decision was surprising insofar as an expert study had concluded only shortly before that "[p]romoting trade integration as a simple linear process in which all the elements of a preferential trade area, free trade area, customs union, common market, etc, are put in place before moving to the next stage, is inappropriate for the SADCC region at this stage or [*sic*] its development" (SADCC 1992: 27), an assessment shared by outside expertise (for example, Green 1990: 107). 'Framed' decision making, once again, led to an institutional choice that was unexpected by many.

Second transformative choice. About a decade later, SADC policymakers faced another situation of institutional choice, even though little progress had been made in implementing the common market objective. Once again, the *timing* tracks a situation of high uncertainty associated with serious scepticism about the organization's continued viability. Towards the late 1990s, external donors, on which the organization continued to be highly dependent, became increasingly dissatisfied with SADC's bad record in economic integration. As early as 1993, the Secretariat expressed its fear that "SADC is losing credibility and risks losing the support of cooperation partners" (SADC Council of Ministers 1993: 39). This risk continued to loom as progress remained slow. The Dutch abandoned their support entirely in 1998 and the Consultative Conference, hitherto "the most important event in the SADC's calendar of activities" (Sidaway 1998: 564), did not take place for the first time that year. At the same time, the organisation was confronted with rumours that the EU, its most important benefactor, would restructure its cooperation with Africa and possibly abandon its Regional Indicative Programme for SADC (SADC Council of Ministers 2000: 82), just as consultations on the new programme were about to start (see also Lenz 2012: 163-64).

The ensuing *process* of debate and institutional reform was surprisingly smooth given the ambitious nature of the task policymakers set for themselves. It was possible because of the salience of the 'new' common market frame as developed in Europe. In March 2001, an extra-ordinary Summit mandated the SADC Secretariat to draw up a five-year Regional Indicative Strategic Development Plan including strategies for the "[d]evelopment of a common market through a step by step approach

while restructuring and integrating the economies” (SADC Summit 2001: 35). Subsequent debate was clearly guided by an EU-type common market frame, even though the EU “never made continued funding conditional upon the adoption of further EU-type institutional change” (Lenz 2012: 164). The plan was officially prepared by a team of EU-oriented experts from the region, many of whom had studied in Europe, based on extensive consultation with member states and other stakeholders. Apparently, the EU funded several consultants who were also involved in the process (Interview with European consultant). When asked about the striking EU terminology in the plan, the ‘father’ of the program simply described it as the “classic model” of economic integration (Interview with Angelo Mandlane), reflecting the theorization of the model that had been advanced by economists such as Balassa.

Regarding the *outcome*, eleven years after the common market objective had been codified in the Windhoek treaty, governments endorsed the more ambitious Regional Indicative Strategic Development Plan (RISDP) in 2003, which reads like a condensed version of the EU’s own integration experience. It details the move from a free trade area via a customs union and common market toward monetary union and the adoption of a common currency within 15 years *inter alia* through the “[h]armonization of policies, legal and regulatory frameworks that address the business environment and the free movement of all factors of production” and macroeconomic convergence based on inflation, budget deficit and overall debt indicators (SADC Summit 2003: 66-67). It also contains targets and time limits similar to the EU’s Lisbon Strategy, adopted a few years earlier. This institutional choice has been utterly surprising to many outside observers, given the differences in conditions faced by Europe and Southern Africa (see Draper 2012). What is more, member states themselves noted shortly before the decision was taken that they were “unclear about the socio-economic costs and benefits of regional integration” (SADC Council of Ministers 2000: 488). In conclusion, the adoption of an EU-type common market and even economic union in SADC was most directly influenced by the EU itself, when compared to the other two cases. In this case, the line between frame diffusion and hegemonic imposition becomes somewhat blurred. I would nevertheless maintain that local policymakers retained considerable leeway in the respective institutional choice because the EU never made its continued financial support conditional upon the adoption of a specific institutional form. The above-cited interview with Angelo Mandlane suggests that the abstract theorization of the EU experience played a considerable role.

5 Conclusion

This paper has analysed a curious empirical phenomenon: the increasing institutional convergence towards ambitious forms of market building across four regional organizations—EU, ASEAN, Southern Cone/Mercosur and SADC(C)—that differ in terms of the structural context in which institutional decisions are taken. It suggested that existing arguments drawn from International Political Economy, Neofunctionalism and Realism offer important insights into the general prerequisites for international economic cooperation in all of these regions, but in the absence of unambiguous economic incentives, strong interest group pressure, supranational entrepreneurship and direct imposition they offer no clear predictions regarding its specific institutional form. The mechanism of frame diffusion was offered to explain institutional convergence amidst largely indeterminate incentives for international economic cooperation. Frames help actors to develop a common understanding of an underlying cooperation problem and appropriate institutional solutions, and they bias the resulting institutional choice. When such frames diffuse across organizations, institutional convergence across different structural contexts and in the absence of outside imposition is the result. Particularly relevant to understanding the gradual institutional convergence in ASEAN, the Southern Cone/Mercosur and SADC on an EU-type common market model are what I have termed a ‘new’ common market frame, as it emerged in Europe in the 1980s, and a related NAFTA frame that emphasizes regional economic cooperation as a solution to heightened competition in the world economy.

This argument has implications for three sets of literature. First, it is compatible with a growing body of work that seeks to develop a constructivist approach to the study of International Political Economy (McNamara 2002; Nelson 2014). It is rooted in what Abdelawi, Blyth and Parsons

(2010: 10) call the “path of cognition” to constructivism, and shares with these approaches the emphasis on cognitive tools that filter information and shape outcomes, while extending them beyond their domestic focus. Combining work on frames with insights from the literature on diffusion allows scholars to capture the transnational origins of frames in the world economy. Whereas an endogenously rooted conception of frames is often useful in understanding divergent institutional choices across structurally similar situations around decision making (for example, Bleich 2002), the concept of frame diffusion is analytically useful in accounting for converging institutional choices in structurally different settings. In line with recent research, it also offers insights into how the meaning of a frame can shift over time, with major repercussions for the spread of an institutional form (see Charnysh et al. 2015). As noted, policymakers in the Southern Cone/Mercosur, ASEAN and SADC initially largely rejected the idea that ambitious market building was an appropriate solution to the problems of preventive war and under-development (the ‘old’ common market frame). However, as the meaning of this frame shifted towards the inclusion of an alternative rendering of the underlying cooperation problem—economic cooperation as a solution to challenges in international competitiveness (the ‘new’ common market frame)—it diffused even among policymakers that were initially sceptical of the proposed institutional form. While this is an important insight, more research is required to understand fully why the attractiveness of certain frames changes over time and why it varies across organizations. The scope conditions of frame diffusion remain to be specified.

Second, the argument shares with recent research in International Political Economy the emphasis on broad trends towards particular types of institutional choices, such as bilateral investment treaties or preferential trade agreements, as a result of diffusion (Elkins et al. 2006; Simmons and Elkins 2004; Baccini and Dür 2012). However, it broadens this literature’s analytical focus beyond competition as the dominant mechanism of institutional convergence to suggest that emulation might also be at play, especially when decisions are taken under conditions of uncertainty. The argument presented here uses these ‘classical’ mechanisms primarily to identify antecedent conditions for the operation of frame diffusion. Its comparative advantage is that it grounds them in solid micro-foundations based on cognition. This renders such arguments less indeterminate regarding the specific institutional form that is likely to result from both of them, as explained. Thereby, the argument presented here shares many assumptions with recent work on bounded rationality that seeks to provide rational choice models with ‘more realistic’ micro-foundations (Weyland 2005; Jupille et al. 2013). In fact, framing can be seen as one cognitive heuristic that introduces bias into institutional choice.

Third, the argument is consistent with a growing research programme on regionalism and (EU) diffusion, which suggests that institutional and policy choices in regional organizations cannot be adequately understood without taking similar choices in other organizations into account (Börzel and Risse 2012; for an overview, see Jetschke and Lenz 2013). However, much of this literature has transferred diffusion mechanisms from the cross-national to the cross-regional context without being sufficiently aware that these settings are rather distinct. Whereas the basic idea that diffusion leads to the adoption of a policy or institution is quite plausible in the hierarchical setting of conventional organizations and national governments, where the idea was first developed and applied, it is less plausible in the context of regional organizations. Here, foreign policies or institutions are seldom simply adopted in any straightforward fashion, but are usually subject to complex negotiations between formally sovereign governments that often pursue widely diverging national interests. The outcome tends to be adaptations of the original model or gradual transfers that extend in time, aspects also highlighted in this paper. Despite the potential deadlock that one might expect to result from such decentralized bargaining regarding diffusion, the argument presented here suggests one reason for its frequent success: shared frames have the capacity to generate consensus among differentially situated actors. The implications of this change in context, and the associated adaptations to the established literature on diffusion likely to be necessary—from the national context applied to the international realm—require further reflection.

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