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# From legal compliance to knowledge brokerage: how a group of farm advisers developed mediation practices between farmers and regulatory authorities

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## ABSTRACT

**Purpose:** This paper investigates how farm advisers can develop their practices beyond facilitating farmers' legal compliance to mediate between farmers' and regulatory officials' knowledge and experience of implementing farm-level legal regulation.

**Design/methodology/approach:** Building on theories of knowledge types and Communities of Practice (CoP), the paper employs a qualitative research design to examine a project aimed at reducing the regulatory burden on farmers, run by advisory organisations in Sweden.

**Findings:** The studied project developed a four-step method for identifying and processing suggestions for simplified farm regulation. Through internal knowledge sharing, integrating external knowledge, negotiating agreements, developing work models and using their own creativity, they produced and presented proposals to regulatory authorities.

**Practical implications:** The study provides a framework for supporting farm advisers in developing their practices by serving as mediators between farmers and regulatory authorities. Implications for policymakers relate to formulating new legislation and updating existing legislation.

**Theoretical implications:** The paper refines the understanding of how farm advisers can develop their practices of mediation and knowledge brokerage through CoPs.

**Originality:** The paper addresses a key aspect of advisory work – knowledge brokerage – and highlights a new role for advisers as mediators of the knowledge regarding farm-level regulatory issues held by farmers and authorities.

## ARTICLE HISTORY



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## Introduction

Farm advisory services play a crucial role in providing knowledge, services and technologies that improve the profitability and sustainability of farmers and rural actors

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worldwide (Christoplos 2010). Recent decades have seen a shift in the conception of farm advisory services, from top-down diffusion approaches focused on technology and information transfer to the incorporation of interactive and participatory practices (Davis et al. 2025). This change involves broadening the scope of farm advisory services, from technology transfer to facilitating innovation and brokering knowledge among a plurality of actors, such as farmers, researchers, and value chain actors (ibid). Farm advisers play a crucial role in facilitating farm-level decision-making through knowledge transfer and brokerage, trust-building, and network configuration (Moojen et al. 2024). They are central to supporting farmers in, for example, the adoption of new technologies (Nettle, Ingram, and Ayre 2025), farm health and safety (Mohammadrezaei, Meredith, and McNamara 2023), and climate-smart practices (Farstad, Forbord, and Klerkx 2024), while simultaneously supporting farmers to achieve sustainable agriculture and food sector goals.

While extensive research has documented the evolving role of farm advisers in relation to knowledge and innovation (as exemplified above), less corresponding interactive development has been noted related to farm-level legal compliance and regulatory processes. By ‘farm-level regulation’, we mean the public means of governing agricultural practices, businesses, and markets. Such governance is a frequently debated topic in politics, with strong proponents and opponents alike (cf. European Commission 2025). Recent decades have seen both a general increase in regulation and political responses aimed at simplifying and reducing the regulatory burden (European Union 2023; OECD 2022; 2025). A recent report shows that the total amount of farm-level regulation in Sweden has increased by 134% over the past 25 years, 1996–2021 (Lans Strömblad and Bergström Nilsson 2022). Hence, Swedish farms producing dairy, meat and crops face 480 rules governing farm operation, in addition to regulations governing private firms and employers in general (ibid).

As the amount of farm-level regulation has increased, compliance with regulations and standards, as well as support with grant applications, have become among the most in-demand topics for the clients of farm advisers (Birke et al. 2022). Facilitating agricultural policy compliance places farm advisers in an ambiguous role as ‘field-level bureaucrats’ (Clement, Labarthe, and Plumecocq 2024). Advisory services on some legal compliance, such as labour and employment law, are limited (Lawton, Gorman, and Beecher 2024). However, some advisers specialise in, for example, supporting farmers’ licensing processes or engagement in voluntary agri-environmental schemes (Vrain and Lovett 2016). Furthermore, advisers can play a potentially key role not only in promoting farmers’ compliance with societal goals but also in informing policymakers and mediating the policymaking process (Nettle and Paine 2009; Tran and Rodela 2019). As the OECD (2025, 4) declare that ‘(r)egulations are improved when those affected by them are considered and involved in the rule-making process’, and that ‘(p)eople are more likely to support and comply with rules when they have had meaningful opportunities to help shape them’, there is the potential for using farmers’ and farm advisers’ knowledge and experiences in the development of farm-level regulatory policies in a bottom-up approach.

Given the growing importance of farm-level legal regulation for farm advisory services, this paper examines the role of advisers in legal compliance and regulatory processes. It poses the research question: How can farm advisers develop their practices

beyond facilitating farmers' legal compliance, to mediate between farmers' and regulatory officials' knowledge and experience of implementing farm-level legal regulation? Central to this investigation is how advisers can draw on their own experience of farm-level regulation and collaborate to build the knowledge and practices necessary to mediate with regulating authorities.

The paper is structured as follows: First, we introduce theoretical concepts from organisational sociology and social anthropology, specifying what regulation is and its role in social organisation. Furthermore, we draw on the theory of Communities of Practice to explain how advisers collectively learn about regulatory issues and how to work with regulatory authorities. Then we use these concepts to analyse a qualitative dataset generated from an ex-post evaluation of the adviser-run 'better-regulations project', which sought to develop a method to ease Swedish farmers' regulatory burden. Finally, we discuss the results, propose implications and future research, and reflect on the study's limitations.

## Theoretical framework

### Definitions

To answer our question, we require a theory that explains how advisers have sought to develop their mediating practices, demanding the definition of certain core concepts. Firstly, a *rule* is 'a statement about how certain types of people or organisations should act in certain situations' (Ahrne and Brunsson 2004, 6, authors' translation), contrasting (implicit) norms or 'unwritten rules'. *Legal regulations* are specific rules created by governmental bodies or authorities at regional, national, and transnational (e.g. the EU) levels that detail how laws are to be implemented, enforced, and audited (Ahrne and Brunsson 2004). Legal regulations are complemented by, for example, voluntary schemes (European Environment Agency 2025), quality standards, and certifications (Chever, Gonçalves, and Lepeule 2022). However, henceforth, rules and regulations refer to those that are legally binding, and interpreted and implemented by public authorities.

### To govern and to be governed: two types of knowledge

For central authorities, and states in particular, successful government means that regulations (legal and otherwise) must be interpreted and enacted through human practice. Interpretation and enactment emphasise the relationship between the governing authorities who establish regulations and the governed individuals, or subjects,<sup>1</sup> who interpret and enact them in practice.

Scott (1998) explains this relationship in terms of the tension between two types of knowledge: *techné* and *mētis*. To govern through regulation means that nation-states (and other central authorities) have come to rely on abstract, commensurable, and simplified types of knowledge, called *techné* (Scott 1998, 319). Such knowledge requires a general language, universal categories and quantifiable accounts. Consequently, nuances such as local conditions and practices are generally left out to ensure efficient governance. Citizens, including farmers, and their activities, on the other hand, rely on a different type of knowledge. This type of knowledge, *mētis*, is characterised by strong context-dependency and is solution-oriented, concerning the actors' everyday environment and practices, and personal ambitions in life and business (Scott 1998, 311).

As types of knowledge, *techne* and *mētis* are both distinct and interdependent. Their fundamental tension stems from the fact that while the state uses *techne* to supervise and govern citizens, it cannot fully mirror the ambiguity, nuance and contextual variation that their *mētis* relies upon (Scott 1998). Conversely, the abstract categories and measures fundamental to *techne* may seem incongruous or irrelevant for *mētis*. Thus, as Scott argues, perceived problems with bureaucracy arise when the dissonance between these two types of knowledge cannot be ignored or easily resolved (cf Bååth and Nilsson 2024). In this sense, knowledge also includes the perspective taken. Moreover, governance will be influenced and challenged by the fact that the officials (i.e. bureaucrats) have their own *mētis* of everyday administration (Scott 1998).

Following Scott, the *burden* of regulation for farmers thus emerges because the authority's *techne* is dissonant with the farmers' *mētis* of running a farm, stemming from a mismatch between the attempt to govern and the ability to be governed. Thus, by employing these two concepts, we may advance our analysis through the identification of how advisers conceptualise and deal with such dissonance.

While scholars recognise the usefulness of the distinction between *techne* and *mētis*, they note that the two knowledge forms are often entangled in practice. Herzfeld (2005) notes that bureaucrats may cunningly use local knowledge to persuade citizens and, conversely, may be more complicit with locals to accommodate room for manoeuvre in state schemes than Scott suggests (cf. Bååth and Nilsson 2024). In fact, the integration of *techne* and *mētis* is seen as crucial for improving complex situations (Ghimire and Chhetri 2023). Yet several barriers to such combinations exist. For example, Mutavi et al. (2018) note that knowledge-sharing occurs most frequently within homogeneous groups that are either *techne*-oriented (science-based) or *mētis*-oriented (locally experiential), and not between these groups, i.e. the groups do not commonly combine their knowledge and experiences. Kumar (2021) suggests that local groups improvise to negotiate with and resist the government's *techne*, implying both the possibility and, at times, the demand for creativity to broker between *techne* and *mētis*.

Calls for brokering multi-actor processes align with the role of farm advisers as knowledge brokers, conceptualised as: 'facilitating collaboration between researchers and stakeholders to foster a process of joint knowledge construction' (Klerkx et al. 2012, 53). While this quote refers to 'researchers', it applies in this context to abstract, universal and commensurable knowledge of regulatory authorities. In this sense, the role of farm advisers has historically evolved in the nexus of universal and local knowledge (Scott 1998). Even if advisers may work mainly with the implementation of agricultural policies at the farm level, the potential role of advisers in mediating the policymaking process provides the point of departure for this study.

### *To develop advisory practices: Communities of Practice*

Advisory practices are continuously being developed and altered (Cerf, Guillot, and Olry 2011). When advisers share their practices with other advisers and develop them through social learning (i.e. interactive learning processes and activities), it fosters the development or enhancement of relevant skills and knowledge (Blackmore 2010). Thus, by learning together, advisers can form a Community of Practice (CoP). Advisers partake in such CoPs not only to share knowledge and experiences but also to co-create new ideas, solutions and action strategies (Landini 2021). Following Wenger (1998; 2010), a CoP is a

group of people who share a concern, a set of problems or a passion about a topic, and who deepen their knowledge as they interact regularly. CoPs are not merely groups but social systems of learning through participation in (meaningful) practice. A practice is one which members of a community perform together and learn through participation in (Wenger 1998). In this case, the learning pertains to advisory knowledge of farm-level regulation and implementation, and to the development of a mediating practice of brokering advisory knowledge and experiences of regulation and that of farmers and regulatory authorities.

Furthermore, learning occurs both at the core and the boundaries of a Community of Practice; these positions offer complementary learning environments (Wenger 1998). In the latter, community members are exposed to foreign competence and encounter different values, commitments and perspectives, which give rise to both tension and new possibilities. The depth of competence within a CoP increases the likelihood of interesting insights at the boundaries, as the coexistence of depth within practices and active boundaries across practices increases the learning and innovative potential of the whole system (Wenger 2010, 184). Thus, advancing knowledge sharing and communal knowledge development is crucial for community members to address novel or increasingly pressing issues. The presence of actors who can span boundaries and enable boundary learning is key for integrating external knowledge in an agricultural context (Ingram et al. 2014).

A CoP is thus a suitable description of, and a sparsely studied aspect of, advisers' peer-to-peer professional learning and collaborative development of new practices (Landini 2021). By utilising the concepts of *techne*, *mētis*, social learning and CoP, our analysis explores whether and how the farm advisers draw on their experiences of farm-level regulation and collaborate to build the knowledge and practices necessary to mediate with regulating authorities, ultimately aiming to ease the regulatory burden on farmers. Specifically, we focus on the formation of a community that develops practices that enable the brokerage of knowledge between the farmers' *mētis*, the regulating authorities' *techne*, and, eventually, the authority officials' *mētis* (of governance practices) to address regulatory issues and promote simplification.

## Methods

The research design is built around examining a case study of an adviser-run *better-regulation project*.<sup>2</sup> The project aimed to find novel methods of communication with authorities and ways to influence farmers' regulatory burden; thus, it provided a suitable source of data to address the research question of this paper.

### *Case study: a better-regulation project*

The Swedish advisory system is dominated by farmer-owned advisory organisations, which provide independent advice on a commercial basis, as well as publicly procured, primarily environmental-related advisory services (Höckert 2017). A specialised service focusing on legal compliance has developed since the 1990s, in response to increasing licensing requirements for large farms, as well as to a general increase in

regulation, documentation requirements, and the risk of sanctions during audits (HIR Skåne 2025).

The studied better-regulation project was run by a farmer-owned advisory organisation in Sweden and aimed to develop a method for identifying, processing, and submitting suggestions for improved regulation to regulating authorities. Ultimately, to ease the regulatory burden on farmers. The project, funded by the EU Rural Development Program, ran from 2020 to 2024. The project manager invited three colleagues from two other farmer-owned advisory organisations to contribute their complementary experiences of farm-level regulation. These advisers all worked in various on-farm legal compliance areas, including animal husbandry, crop production, licensing processes, environmental impact assessments, documentation requirements and supporting farmers ahead of audits. An expert from the Federation of Swedish Farmers, an interest and business organisation for the green industry, was also included in the project. Henceforth, this group of five constitutes ‘the project group’. At the time of the study, the project group’s members each had 15–25 years of experience in farm-level regulation work.

### *Data collection and analysis*

The first author ex post evaluated the better-regulation project between May 2023 and August 2024 (Blix Germundsson 2024). While the evaluation took place at the end of the project’s runtime, it included participatory observations of the meetings during which the project group summarised and reflected on the entire process and its outcomes. Thus, this paper is based on data collected in the study evaluating the project (ibid).

The evaluation employed a qualitative methods design to generate multiple complementary types of data and provide a rich, multifaceted picture (Patton 2014). Three resulting datasets – project documentation, interviews, and participatory observation (summarised in Table 1) – form the basis of the analysis. While the evaluation resulted in a report (Blix Germundsson 2024), the analysis of the material has been jointly developed by both authors for this paper.

Using a maximum variation sampling strategy (Patton 2014), the evaluation identified interviewees within the project group and among participants in the dialogue meetings to

**Table 1.** Datasets and analysis in the evaluation.

Dataset	Data description	Means of analysis
Project documentation	Lists of collected suggestions; files of sorting and prioritising; analyses of suggestions; presentations and notes from dialogue meetings and project group meetings.	The data were used to provide context and details.
Interviews	Transcripts from 22 semi-structured interviews through online meetings from November 2023 to May 2024. The interviews lasted 40–60 min and were documented through audio recording and detailed notes.	The data were analysed through deductive coding, i.e. coded according to each step of the process. Second, the material within each step was coded inductively according to its thematic content, in several iterations to ensure comprehension of sections containing particularly dense, overlapping or complex information.
Participatory observation	Field notes from participatory observations in three subsequent project group working meetings from August 2023 to August 2024.	The data were used to provide context.

determine the sampling approach and sample size. The interviewees represented a broad range of organisations and roles, from private companies to regulatory authorities and ministries (see Table 2). All but one interviewee took part in one or more dialogue meetings. Further details of the dialogue meetings are presented in the Results and Analysis section. Quotes from the interviews have been translated into English by the authors.

## Results and analysis

In this section, we present the results and analyse them in relation to the four steps of the better-regulations project's method (see the case study description). We follow the process of how an authentic suggestion fared through the steps and reflect on the project group's formation of a Community of Practice for the development and testing of their method. To contextualise the method's four steps, we first analyse the project groups' rationale for developing their advisory practices for regulatory issues.

### *Aim of the better-regulation project*

The project group aimed to develop and pilot-test a method for collecting and analysing suggestions for legal improvement, and to submit them to regulatory authorities for further processing. Thus, the project adopted a pioneering, experimental approach to

**Table 2.** Interviewees in the evaluation.

Title	Organisation	Alias	Role in the project
Farm adviser, expert in licensing	Advisory organisation 1 (farmer-based)	11	Project manager, author of analyses, dialogue meeting organiser
Farm adviser, expert in licensing	Advisory organisation 2 (farmer-based)	12	Project group member, dialogue meeting organiser
Farm adviser, expert in animal husbandry regulation	Advisory organisation 3 (farmer-based)	13	Project group member, author of analyses, dialogue meeting participant
Farm adviser, expert in crop production regulation	Advisory organisation 3 (farmer-based)	14	Project group member, author of analyses, dialogue meeting participant
Expert in animal husbandry regulation	Federation of Swedish Farmers	15	Project group member, author of analyses, dialogue meeting participant
Expert in crop production	Federation of Swedish Farmers	16	Dialogue meeting participant
Veterinarian, expert in animal husbandry	Advisory organisation 2 (farmer-based)	17	Dialogue meeting participant, author of analyses
Farm adviser, expert in animal husbandry	Advisory organisation 4 (farmer-based)	18	Dialogue meeting participant, author of analyses
Farm adviser, expert in biogas	Private adviser	19	Dialogue meeting participant, author of analyses
Marketing manager	Value chain actor	110	Dialogue meeting participant
Manager	National authority 1	111	Dialogue meeting participant
Manager	National authority 1	112	Dialogue meeting participant
Official	National authority 1	113	Dialogue meeting participant
Official	National authority 1	114	Dialogue meeting participant
Official	National authority 1	115	Dialogue meeting participant
Official	National authority 2	116	Dialogue meeting participant
Official	National authority 3	117	Dialogue meeting participant
Manager	National authority 4	118	
Official	National authority 4	119	Dialogue meeting co-organiser
Official	National authority 4	120	Dialogue meeting co-organiser
Official	Government ministry 1	121	Dialogue meeting participant
Official	Government ministry 2	122	Dialogue meeting participant

regulatory improvement. A member of the project group underlined the project's motives by reflecting on how adequate regulations are an essential part of a well-functioning society:

Good regulations and good legal procedures are the basis for a well-functioning democratic society. If we don't have that ... then we are ruining democracy. (I5, expert in animal husbandry regulation)

The quote illustrates how the project group did not question the legitimacy of farm regulation or authorities *per se*. Rather, they challenge authorities to review the quality and efficiency of their governance and regulatory frameworks. Thus, the project group finds current regulations and the associated governance practices to be substandard and in need of improvement. One group member explained the project's motives as follows:

The project has arisen from some frustration over all this legislation and the fact that no one is addressing it or seeing the bigger picture. Various officials often focus only on their specific issue and think that their regulation is easy to follow, without recognising that the farmer has a thousand things to consider. (I2, adviser, expert in licensing)

The quote highlights one of the challenges in communicating with authorities on regulatory improvement issues. In the advisers' experience, authorities often lack the full picture of the amount of regulation a farmer faces, or a view of the farmer's reality which these regulations are supposed to govern. Thus, the advisers called for facilitation between the practical knowledge of everyday farm work (concrete and locally situated *mētis*) and the legal knowledge of regulatory authorities (abstract, formalised and generalisable *techne*) (Scott 1998), to reduce farmers' regulatory burden.

### **Step 1. Collecting suggestions for improved regulation**

For the first step, the project group collected suggestions for improved regulation. This was achieved through farmer interviews and a website submission function, centred on the question: What do you want to simplify? This question prompted those who experience regulations in their daily work to share their views on how the rules operate in farming practice and the regulatory challenges they face. Thus, the project group deliberately shifted focus from the general state of regulation to regulatory improvement for farmers (rather than authorities).

The project group found that the farmer interviews provided both breadth and depth in the review of regulations. The sample covered a variety of farm sizes and types of operation (5 each from dairy/beef, sheep/lamb, crop production, and hog farming), male and female farmers of various ages, and from seven regions<sup>3</sup> (thereby governed by different regional and local authorities). The project group concluded that a sample of 20 farms was sufficient to cover the most common legal and licensing requirements and related issues, such as audits. While the group found the interviews valuable, they also raised concerns regarding their generalisability, as one of the advisers acknowledged:

Interviews are good because they allow for a discussion of the entirety. But of course, they are very dependent on the individual – you tend to choose a farmer you know has opinions and wants to talk about them, and they may not be representative ... [Still,] interviews are a very useful tool when you want to get to the bottom of how severe a problem really is. (I3, adviser, expert in animal husbandry regulation)

Despite some methodological hesitance, the quote shows that the interviews provided the project group with learning opportunities that complemented their already extensive experience with farm regulatory issues. In particular, the interviews shed new light on the aggregate of legislation affecting farmers and enabled deeper discussion of specific regulatory issues.

Turning to the suggestions submitted through the website,<sup>4</sup> these offered more general views of farmers' work and issues with regulatory compliance. The project group evaluated the suggestions based on their relevance for farmers, which led to new insights among the group's members. One of them commented:

We learned from what was submitted via the website that you don't always understand what people mean. They hardly write which regulation and paragraph, but more like, for example, to simplify labour immigration or scrap [certain] documentation. So, we had to interpret the suggestions and turn them into a specific request. (I1, adviser, expert in licensing)

Thus, the project group could not simply compile ready-made suggestions, leading to the (unanticipated) task of interpreting and rephrasing incoming suggestions into specific requests for particular pieces of legislation. The project group found this challenging due to a lack of in-depth discussion with the submitter. Relating the suggestions to a particular item of legislation required further learning about regulations to decipher which exact legal tenet a suggestion referred to.

The processing of the suggestions illustrates an important tension: the experience of regulatory issues does not necessarily relate to specific legal tenets but rather to the aggregate issues of being governed. Hence, demanding some creativity of the project group to align the suggestions' *mētis* with the regulations' *techne* (cf. Kumar 2021). Therefore, to develop requests for regulatory simplification, the project group positioned itself between the types of knowledge to learn from both sides. This linking of *mētis* and *techne* meant the development of knowledge brokerage in the project group (cf. Bååth and Nilsson 2024, where no such brokerage was sought, leading to epistemological dissonance between authorities and their subjects). By sourcing each other's expertise and learning from farmers and authorities, the project group formed a Community of Practice and pursued active boundary learning already in the first step (Ingram et al. 2014; Wenger 2010, 183).

The project group gathered 110 suggestions from farmer interviews and 60 more via the website, with 20 overlapping. This resulted in a master list of 150 unique suggestions for improved regulation (see Bergström Nilsson and Lans Strömblad 2021). One of these suggestions addressed the legally required ear tags for cattle and sheep, and the administrative effort and cost of ordering new tags when they fall off. Animals lacking two visible ear tags during an audit or when transported to slaughter can mean a large fine for the farmer. The incoming suggestion was:

It should be OK to have blank ear tags in reserve at home, on which you write the individual number yourself, and this should count as an ordinary tag. Now ear tags are ordered every week, so that they are ordered before a possible audit is announced. A tag is not expensive, but it adds up to a lot of money with administrative fees when ordering. An alternative is to order replacement tags for all animals. (simplification suggestion via interview)

The project group interpreted and rephrased this incoming suggestion into a specific request, reducing it to the parts directly related to the regulatory burden: 'It must be

permitted to have blank ear tags in reserve at home, on which the farmer writes the individual number, and this should count as an ordinary tag'. Thus, the project group rendered the suggestion relevant for *techne* by editing out the farmer's *mêtis*, which fell outside the *techne*'s scope. This example will be followed through the upcoming steps, henceforth referred to as the 'Ear Tag suggestion'.

### **Step 2. Sorting and prioritising suggestions**

The second step in the project included sorting and prioritising the 150 collected suggestions for regulatory improvement. The project group did this collectively as it required knowledge sharing and negotiation of assessments. Initially, the project group defined criteria for analysing and sorting the suggestions:

- (1) The suggestion's (potential) impact on the farms' social, economic and ecological sustainability;
- (2) Whether the suggestion could improve competitiveness, the national self-sufficiency rate of Swedish agricultural produce, or farmers' willingness to invest in their farms;
- (3) Whether the project group deemed the regulation in question redundant, difficult to comply with, or a cause of anxiety for the farmer.

These criteria, together with the scope (i.e. the estimated number of farms affected), formed the basis for the suggestion's 'impact factor'. A high impact factor indicated that the suggestion addressed an issue for many farmers or had a significant impact on a smaller number of farms.

To identify the most promising suggestions, the project group calculated a value for each based on two factors: potential impact for farmers and likelihood of regulatory change. Both the impact and likelihood of change factors were rated from 1 (low) to 5 (high), and their product formed a prioritisation score used to rank the suggestions. These factors were discussed in project group meetings. In the discussions, the adviser with the most expertise in the specific field was given priority. Interviewee 2 outlined the said value as follows:

After so many years with these issues, one gains some insight. What does this rule cost, what work is involved, what is required to comply with it? It makes it easier to evaluate the suggestions than if one didn't have that experience. (I2, adviser, expert in licensing)

The quote illustrates how the project group leans foremost on their experience of what it takes to comply with a specific regulation at the farm level when sorting and prioritising the suggestions. Interviewee 5 emphasised the importance of prioritising suggestions that are known to be challenging to realise, especially if they are important to many farmers.

If you see that this really is an obstacle for farms, then it becomes something that you need to work on ... It's also important to dare – sometimes it's like, 'Well, this is an EU regulation, and it can't be changed'. But even the EU is interested in having good regulations. (I5, expert in animal husbandry regulation)

The interviewee understood that prioritising proposals perceived as challenging to change may meet resistance; thus, there was a need to 'dare' to do it, despite the risk of facing opposition from officials.

Although the group members did not always make the same initial assessment, they discussed until reaching a consensus. In addition to applying their complementary expertise, the advisers consulted colleagues and experts to obtain more knowledge for their negotiations. Even though the project group adopted criteria to facilitate objectivity, all prioritisation ultimately depended on value judgements, and the group members acknowledged the challenges of prioritising. Interviewee 1 (adviser, expert in licensing) noted that ‘there has been a lot more politics in this than I thought there would be’. Thus, despite the criteria, prioritising spurred discussion and negotiation in the group. This reflects Landini’s (2021) study, where advisers stated that knowledge is, and also should be, distributed among colleagues in collaborative manners. In addition to co-creating new ideas and strategies in CoPs (Landini 2021), our results reveal how advisers use a CoP to negotiate assessments and form agreements by integrating their own and external knowledge.

To exemplify the ranking model, the assessment of the Ear Tag suggestion was concluded that current regulations threatened farmers’ economic sustainability, as difficult to comply with, and as affecting farmers’ competitiveness and willingness to invest in their farms. This rule affected all cattle keepers and, to some extent, sheep and goat keepers – a total of approximately 16,000 farms in Sweden.<sup>5</sup> Thus, the estimated impact for farmers was set to 5 (high). Then, since the suggestion concerned several different regulations and directives, primarily at the EU level, the probability of regulatory change was set to 3 (middle). These numbers were multiplied into a prioritising factor, in this case  $5 * 3 = 15$ .

The ranking model enabled the project group to reduce the 150 original suggestions to a priority shortlist of 55. The development of the set of criteria suggests a degree of creativity beyond the thematic alignment of Step 1, by considering impacts from the farmers’ vantage point. Thus, the project group developed their knowledge brokerage by formalising it in a ranking.

### **Step 3. Analysing the suggestions**

In the third step, the project group conducted a comprehensive, individual analysis of the 55 prioritised suggestions. This required in-depth expertise. Thus, the project group decided to invite advisory service colleagues’ complementary expertise to support the analyses.

The 55 analyses<sup>6</sup> usually comprised 2–6 pages each, and outlined four core matters: the nature and scope of the problem, the relevant regulations, proposing one or more simplifications or other kinds of improvements, and the potential consequences of the suggested changes. The fact that these analyses considered possible solutions to farm-level regulatory issues and provided concrete suggestions for change was perceived by the project group as a constructive way to initiate a dialogue with authorities.

The authors of the analyses were generally aware that their perspective influenced their analyses. Interviewee 8, one of the invited expert advisers, reflected on their strategy to mitigate personal biases:

I tried to remain fairly neutral and not just say ‘ugh, you’re wrong’ but rather to present arguments for why a change might be necessary. I believe I’ve taken into account how they think, and I’ve been in contact with them on some of these issues before, so I think I have some understanding of how they need to apply the rules and why. But I also felt a

certain uncertainty ... I might have missed something ... That's a bit of a weakness in the system, that there's only one investigator. Maybe there should have been several working on the same area, to give it more weight ... I've tried to call [the official in charge] and ask when I've been unsure about something ... [However,] my impression from the dialogue meeting was that, in general, people thought it was well investigated. (I8, adviser, expert in animal husbandry, invited to write analyses)

The quote above shows how this author sought to attain neutrality in their knowledge brokerage, distancing the suggestion from their personal views, and actively including complementary perspectives and information by contacting the official in charge. The analysis implied a bridging of the farmers' practical issues stemming from governance with the relevant legal tenets, making concrete proposals for simplifications (or improvements) and estimating their consequences. This required the advisers to improvise and to be more creative in brokering the two types of knowledge. Relating to such a meeting, Kumar (2021, 801) explains that 'improvisations take one form of knowledge into the realm of the other', by which new ideas and solutions emerge. Furthermore, the two knowledge types can be used to coordinate and inspire improvisations (Kumar 2021). This may indicate the advisers' source of creativity in writing the analyses with their improvement proposals. Thus, the analysis furthered the creativity of brokerage beyond the general criteria to tensions of *techne* and *mētis* in individual suggestions.

The analysis of the Ear Tag suggestion stated that while the regulation served its purpose, it also created concern, stress, and additional work for farmers. In some cases, even occupational health issues, as it can be difficult to re-tag an animal. Such issues were certainly exacerbated by the fact that animals classified as untagged can incur significant financial penalties.

The proposed improvement was that handwritten replacement ear tags should be treated as regular ear tags if the animal's identity can be reliably verified, for example, using a transponder or electronic tag. At least five different regulations were listed as affected, primarily at the EU level. The proposal was merged with a proposal for electronic tags, and its final title was 'Allow handwritten ear tags in combination with electronic tags, transponders, or similar devices'. It was selected to be presented at the milk/beef dialogue meeting.

24 of the 55 analysed suggestions were prioritised through project group discussions based on their judgements, as well as the written analyses. This process rendered five themes, each of which became a dialogue meeting in the next step: sheep/lamb, milk/beef, plant protection chemicals, biogas, and biotope protection.

In this third step, the project group practically engaged in and developed their CoP by inviting expert colleagues to write analyses and bringing in the perspective of authority officials. The latter perspective was organically shaped by the officials' practical knowledge of working with regulations, introducing an additional type of knowledge – bureaucrat *mētis* – to the knowledge brokerage, which we will explore in more detail as follows.

#### ***Step 4. Setting up dialogue meetings with regulatory authorities and other stakeholders***

As the final step, the project group organised the five dialogue meetings with key stakeholders, including farm advisers and representatives from regulating authorities, related

to each of the identified themes. These were held between January and November 2022. Each meeting lasted 2.5 h and was attended by 12–18 participants, 7–11 authority representatives and 5–7 representatives of advisers and industry. The meetings aimed to present the final suggestions for improved regulation, foster a shared understanding of the associated problems among authorities and other stakeholders, discuss possible solutions, and decide on further steps towards achieving this. Each of the five dialogue meetings dealt with four to six suggestions, 24 in total.

Due to the Swedish Agency for Economic and Regional Growth's official mandate to promote regulatory simplification, they offered to assist with the meetings. The arrangement was such that the project group was responsible for the preparatory work, content and invitation list, while the agency distributed the invitations, provided a moderator for the meeting and compiled meeting notes. While considering professional moderators, the agency ultimately decided to moderate the event itself. An official emphasised the value of the moderator having deep knowledge of the issues, arguing that it made it possible to 'ask more informed follow-up questions and take the dialogue further' (I20, dialogue meeting co-organiser at national authority). This shows the importance of the moderator being well-informed on the subject matter. The interviewee also emphasised the moderator's role in creating a secure atmosphere within the group, promoting trust and open dialogue.

In the dialogue meetings, participants worked through each suggestion, beginning with the analysis presented by its author. Second, everyone in the meeting was invited to discuss these items. To achieve the initial goal of establishing a common understanding of the problem, several stakeholders could provide input. Lastly, the participants discussed and clarified the opportunities for improvement and the related difficulties. The ambition was that the authorities would continue working on the improvement suggestions after the meeting. Overall, the authority officials reacted positively to the project's process for generating improvement suggestions, though they also expressed some resistance. A manager at one of the national authorities said (in the ex-post evaluation interview):

[It was] not always clear what, or how, the topics [were] selected, the things to be discussed, why these particular issues were brought up – we sometimes wonder about that. But at the same time, we want to listen to what people have to say and how they experience things, so we approached it pretty openly. If this is what you want to talk about, then we'll talk about it. (I11, manager at national authority)

The quote reflects how, despite some scepticism about prioritising suggestions, there was general openness to listening to the advisers' viewpoints. When it comes to expectations for change, however, things become more difficult, according to the same interviewee:

What I perhaps find a bit problematic ... is when we're dealing with an EU regulation. Then it becomes a bit difficult to balance things. If a number of farmers really want a particular solution, but on the other hand, there's an EU regulation where 27 member states have agreed that disease control, for example, should be done in a certain way – it's very difficult to change something like that. These things carry very different weight. I can completely understand that yes, of course, it's inconvenient, but we still won't be able to change that ... Instead, we have to make simplifications where simplifications are possible, and there are areas where that can be done – but in some areas, it simply can't. (I11, manager at national authority)

The quote reflects the position of several interviewed officials that some proposals should not have been prioritised, as they either concerned EU regulations that the authorities could not change, were already (partially) addressed by authorities, or were entangled with other complicated regulatory frameworks, thus possibly enlarging the scope of the question. Thus, several officials suggested that a preliminary meeting could have been held in which such suggestions could have been removed from the agenda, so as not to spend time and resources on suggestions that could not be changed. Essentially, these suggestions called for a more comprehensive inclusion of the officials' bureaucrat *mētis*.

However, such inclusion of the bureaucrat *mētis* did not align with the aims and ambitions of the project group; to voice the farmers' *mētis* and broker it with the authorities' *techne*, which included daring to challenge even those regulations that may be difficult to change. Several officials emphasised their practical knowledge of bureaucratic procedures (*mētis*), noting that the potential for policy change depends heavily on a regulation's update cycle. From their perspective, the best time to discuss changes is in the period before and during scheduled updates. This revealed both a blind spot in the project's earlier steps and highlighted the officials' interests, shaped by more *techne*-oriented practices, as competing with those of the farmers. While the advisers worked to ensure their own and farmers' knowledge, based on their experience of how each regulation plays out at the farm level, the authority officials viewed the prioritised suggestions in the context of the regulatory work needed to accommodate any changes. Thus, while the advisers' *mētis* emphasised the practicalities of their work and farm work, the officials' bureaucrat *mētis* emphasised the practicalities of governing through regulation and for changing policy (Scott 1998). The latter, unsurprisingly, was more in line with the government's *techne*. Hence, it mirrors Kumar's (2021) argument that what becomes a legitimate form of improvisation (and thus creativity) is limited by relatively powerful actors' moral knowledge; in this case, it was limited by what regulations the bureaucrat *mētis* defined as legitimate to propose improvements for.

Overall, however, the interviewed officials' view was that, although they experienced the analyses of different suggestions as biased towards agriculture and lacking in terms of bureaucratic expertise, they still managed to capture the overall picture of farm-level difficulties with specific regulations. A manager at a national authority specified that, '(t)here is ongoing internal work on regulatory simplification, and I can say that I have made use of the material I received back then in that work' (I12, manager at national authority). The quote highlights how the project's analyses complemented the authority's internal efforts to simplify. The manager also mentioned that they contributed their own expertise at the dialogue meeting, a point echoed by several officials, who identified a general need for complementary legal or bureaucratic expertise in the analyses. Most clearly, this point was illustrated by an example involving complex tax legislation on sustainability statements for biogas plants. The tax legislation expert from the government ministry explained their perspective on the issue and the analysis that was carried out:

Before the meeting, we received a few short memos or whatever you want to call them, where I understood that two of them concerned my area – tax legislation. Unfortunately, I had a very hard time understanding what they were about ... What I would say, in that case, is that the person who wrote these wasn't a tax expert themselves – and I completely understand that, because there are very few of us who are – but it resulted in quite a bit of conceptual confusion ... But I fully understand that, for a farmer, this is how it looks ... It

was really during the meeting and partly afterwards that I understood what the problem was, that is, they are experiencing a problem that I actually didn't know about before, so that's at least something to take away from it. (I21, government ministry official)

The quote illustrates several issues. First, the fact that the analysis was confusing to the expert highlights how legal expertise could have contributed to the analysis. Second, the expert acknowledges different perspectives and that not everyone can possess the required legal expertise. Third, it was only during the meeting that the expert began to understand the nature of the problem, which highlights the value of the dialogue meeting bringing farm advisers, authority officials and government ministry experts together. Finally, the expert acknowledges their new awareness of an issue they had not previously known about.

The tensions, as well as the value in brokering, between *techne* and the farmers' and officials' respective *mētis*, are neatly concluded in the case of the Ear Tag suggestion. Reacting to this issue, which is of great importance to many farmers, the officials emphasised that this regulation is governed by EU regulations, where the basic animal identification requirements are firmly institutionalised, and thus it was very difficult to change. Nevertheless, the dialogue meeting still concluded that further studies should be conducted on the industry's and authorities' interest in the functionality of injectable chips, as well as the scope for action regarding the numbering system under current EU law. Moreover, since the project, the legal period for replacing a lost ear tag has been further defined and extended, implying that the advisers' knowledge brokerage might still have had, or at least could have, some effect on such firmly institutionalised regulations. Following Herzfeld (2005), this may result from the entanglement of *techne* and *mētis*, and officials may have various reasons to accommodate citizens' difficulties and wishes. It should also be noted that such regulatory improvements fell within the legitimate space of creativity according to the bureaucrat *mētis* (cf. Kumar 2021).

In addition to knowledge brokerage, the dialogue meetings also offered the participants the opportunity to foster novel, relevant relations. As Mutavi et al. (2018) note, one of the main barriers to the integration of *techne* and *mētis* is that knowledge sharing occurs mostly within, rather than between, groups from the two knowledge orientations, in this case, between *techne*-oriented officials and *mētis*-oriented farmers and farm advisers. While cross-group communication and knowledge sharing are crucial, Ghimire and Chhetri (2023) note that it must be taken a step further, into processes of co-production of knowledge between the different actors, for the successful development and implementation of strategies. However, as the project under study was time-limited and experimental in nature, the question of whether such co-productive processes can emerge in the future remains open.

## Discussion and conclusions

This paper poses the question of how farm advisers can develop their practices beyond facilitating farmers' legal compliance to mediate between farmers' and regulatory officials' knowledge and experience of implementing farm-level regulation. Central to this investigation is how advisers can draw on their own experiences of farm-level

regulation and collaborate to build the knowledge and practices needed to mediate with regulating authorities, ultimately aiming to ease farmers' regulatory burden.

In an overview of the project group's learning, the first step, collecting suggestions, involved learning from farmers about the entirety and specifics of farm regulation, as well as how to interpret and relate incoming suggestions to the relevant legal provisions. This required knowledge brokerage between farmers' aggregate practical issues of being governed and the specific legal provisions causing those issues. This is a practical demonstration of a specific dimension of brokering that further refines the concept of farm advisers as knowledge brokers (Klerkx et al. 2012).

In the second step, we find that the project group not only draw on each other's complementary expertise to co-create new action strategies (Landini 2021) but also learn to negotiate assessments and agreements by using their own and external knowledge to, in this case, create and implement the ranking model. This adds to the understanding of how farm advisers can use CoPs core and boundary learning to further their own knowledge and practices (Ingram et al. 2014; Wenger 2010).

In the third step, the project group and invited expert advisers use improvisation and creativity in the nexus of *techne* and *mētis* to write the analyses, propose concrete simplifications and improvements, and estimate their consequences. Thus, illustrating how the advisers, as intermediary actors, creatively developed their brokerage practice by interrelating the two types of knowledge, rather than merely attempting to resist *techne*. These findings provide a new dimension to Kumar's (2021) notion that creative practices, such as improvisation, flourish in the nexus of *techne* and *mētis*.

In the final fourth step, the project group encounters a blank spot in their process: the officials' *mētis* for working with regulatory change. It became clear that, while the project group aimed to ease the regulatory burden for farmers, officials focused on regulatory changes within their own purview. Thus, the project groups' ambition to emphasise farmers' regulatory issues was, to some extent, viewed as a bias by the officials. Thus, it is possible that if their *mētis* of regulation and policy change had been included at an earlier stage, it could have undermined the project's ambitions, because of the bureaucrats' power to limit the suggestions to a subset of 'legitimate' regulations (cf. Kumar 2021). Such inclusion could mean that the convenience for officials in achieving regulatory improvements risks overshadowing the most meaningful improvements for farmers, thereby misdirecting the project and losing track of its underlying rationale. While we can only speculate regarding the results of an earlier inclusion, the findings nevertheless emphasise that the question of how to include different types of knowledge most appropriately in a better-regulations project is not a given and requires further investigation.

In addition, there were unexpected learning outcomes of the dialogue meetings, including new insights stemming from participants' thorough discussion of the proposals and the new relationships formed among participants. The latter is vital, as noted by Mutavi et al. (2018), and may potentially lead to further dialogue in the spirit of Ghimire and Chhetri's (2023) endorsement of knowledge co-production between the different actors.

Thus, in summarising how the project group developed their practices to mediate between farmers' and regulatory officials' knowledge and experience of implementing farm-level legal regulation, the results point to the advisers' forming of a CoP. It enabled sharing their own expertise within the CoP, integrating external knowledge (boundary learning), negotiating assessments and agreements, developing work

models, and using their creativity to produce and present their proposals to authority officials, despite the disparate perspectives of their respective *mētis*' relations to *techne*.

In a practical sense, the better-regulation project and the findings of this study are responses to the debate over the increasing regulatory burden on farmers (European Union 2023; OECD 2022). Despite political claims to reduce the burden, simplifications are lagging (European Commission 2025; OECD 2025), provoking the advisers' frustration and the motivation for the project. While the four-step model was pioneered and explored with limited time and resources, it may provide a framework to support farm advisers in expanding their roles and developing skills as mediators between farmers and regulatory authorities.

The implications for policymakers relate to the challenges faced by politicians and regulatory authorities when formulating new legislation and updating existing legislation. To ensure relevant and well-functioning regulations and avoid unnecessary bureaucracy and redundancy, regulators need to consult and include the knowledge (*mētis*) of the target groups (European Union 2023; OECD 2025). Even when such processes may be time-consuming and costly, the alternative may be even more costly in terms of perceived bureaucracy and a potential reduction in citizen trust in societal institutions, the rule of law and, ultimately, in democracy. However, as indicated by this study's results, how exactly such inclusion is best achieved remains an open question.

The findings add to the scholarly debate on how farm advisers develop their practices (Cerf, Guillot, and Olry 2011) by noting that advisers' practices are not confined to focusing solely on farmers but can also be directed towards mediating regulatory issues between farmers and authorities. Thus, it speaks to the potential highlighted by Nettle and Paine (2009) and Tran and Rodela (2019) of advisers as mediators in policy processes. In relation to advisers' role as knowledge brokers (Klerkx et al. 2012), this study provides a demonstration that refines the understanding of how advisers can work to combine different types of knowledge, negotiate agreements and work models, create new proposals, and communicate these to relevant stakeholders. Furthermore, it adds to the research on farm advisers as field-level bureaucrats, whether in relation to legal requirements, voluntary agri-environmental schemes, or industry standards (Clement, Labarthe, and Plumecocq 2024).

The limitations of the study are primarily related to the *ex post facto* nature of the data collection, which may have affected respondents' recall. In addition, as is the case with qualitative studies of specific cases, it remains open for future studies to investigate whether and to what extent the development of knowledge brokerage on regulatory issues may vary, not least across different institutional contexts.

As support in legal compliance is one of the services most in demand for farm advisers (Birke et al. 2022), this study may inspire further investigation of the role of farm advisers in this area. It is also relevant to consider whether the role of advisers in farm-level regulatory compliance should be included in the education and professional training of advisers.

## Notes

1. In the dual sense of the word – subjects as intentional actors, contrasting with objects, and as the subordinates of an authority.

2. 'Better regulation' is an accepted prefix for efforts towards regulatory simplification and improvement (cf OECD 2022).
3. Regions: Skåne, Halland, Västra Götaland, Östergötland, Uppland, Gävleborg and Västernorrland.
4. The website was communicated to farmers through a YouTube clip, available at <https://www.youtube.com/watch?v=wWn-v9JQ2v8> (15-10-2025).
5. As estimated in the analysis of the suggestion.
6. Available in Swedish at <https://hushallningssallskapet.se/forenklingforslag-med-konsekvensbeskrivningar/> (15-10-2025).

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No potential conflict of interest was reported by the author(s).

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