Same-Sex Marriage

the power of politics or the power of discourse?

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Abstract

This thesis conducts a congruence analysis to test the strength of two dominant but competing theories within the public policy literature: the Advocacy Coalition Framework by Sabatier and the Discourse Coalition Framework by Hajer. There is a gap in the existing literature on the ability of the classical public policy theories to explain change in morality policies. The research aim of this thesis is therefore to discover whether it is the power of politics or the power of discourse that best explains variation in the degree of permissiveness across countries. As case studies, the policy processes that have led to the legalisation of same-sex marriage (SSM) in the Netherlands (2001) and Germany (2017) have therefore been examined comprehensively.

Two hypotheses – formulated to assess the strength of the ACF and the DCF – have been tested on the Dutch and German case. The analysis of these hypotheses finds that whereas the ACF can explain the policy process in the Netherlands, the DCF can explain the policy process in Germany. The conclusion of this analysis is that neither the ACF nor the DCF accurately and consistently explains morality policy change with regards to SSM. The fact that both theories have been challenged by the opposite cases – even though these have been carefully selected in the theoretical framework and research design – tells us a great deal about the weakness of both of these classical theories to account for morality policies.

The existing literature reveals that there is a wide variety of explanations that account for variation in the degree of permissiveness towards morality policies more generally and same-sex marriage specifically, the most dominant of which have been the role of religion, societal value conflicts, party cleavages, the role of the judiciary and international influences. Although the ACF and DCF address the party cleavages and societal value conflicts respectively, they – as well as the other classical public policy theories – fail to address other important factors that may lead to morality policy change. Therefore, the conclusion of this thesis is that morality policy change *is* significantly different from other fields of regulation, and should therefore be treated as such. Hence, there is a need in public policy research to either alter existing theories to account for a wider range of policy issues, or to create new theories or frameworks that explicitly account for morality policy change.

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List of abbreviations

ACF	Advocacy Coalition Framework
BVH	*Bundesverbands Homosexualität*; German LGBT organisation 1986-1990
CDA	*Christen-Democratische Appèl*; Dutch Christian democratic party
CDU	*Christlich Demokratische Union Deutschlands*; German Christian democratic party
CDU/CSU	Christian democratic political alliance of CDU and CSU
COC	Cultuur- en Ontspanningscentrum; Dutch LGBT organisation
CSU	*Christlich-Soziale Union in Bayern*; Bavarian Christian democratic party
D66	*Democraten 66*; Dutch social liberal party
DCF	Discourse Coalition Framework
E&HR	equality and human rights; discourse, the Netherlands
FDP	*Freie Demokratische Partei*; German conservative liberal party
GPV	*Gereformeerd Politiek Verbond*; Dutch Christian conservative party
H	hypothesis
HR	human rights; discourse, Germany
LGBT	lesbian, gay, bisexual and transgender
LSVD	*Lesben- und Schwulenverband Deutschlands*; German LGBTorganisation 1990-present
MP	member of parliament
PvdA	*Partij van de Arbeid*; Dutch social democratic party
RP	registered partnership
SGP	*Staatkundig Gereformeerde Partij*; Dutch Christian conservative party
SPD	*Sozialdemokratische Partei Deutschlands*; German social democratic party
SPMF	special protection of marriage and the family; discourse, Germany
SSM	same-sex marriage
SSU	same-sex unions
TMM	traditional meaning of marriage;discourse, the Netherlands
RPF	*Reformatorische Politieke Federatie*; Dutch Christian conservative party
VVD	*Volkspartij voor Vrijheid en Democratie*; Dutch conservative liberal party
X	independent variable
Y	dependent variable

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Chapter 1. Introduction

In the past three decades, major societal transformations have occurred as governments are becoming increasingly tolerant towards minority groups. Especially the rights of the lesbian, gay, bisexual and transgender (LGBT) community have improved tremendously, most striking of which has been the expansion of relationship recognition of same-sex couples across countries. Twenty-six countries have currently legalised same-sex marriage (SSM) and another seventeen countries have legalised another form of same-sex union (SSU). As Kollman (2017) accurately states: "Given the rapid spread of SSU policies, it is easy to forget how controversial such policies were just two decades ago" (p. 100). When the Netherlands first legalised SSM in 2000, the world was in shock about this extraordinary policy change that not only improved LGBT rights, but also affected marriage as an institution. But within a relatively short amount of time, many democracies – both in and outside of Europe – followed the Dutch example by legalising SSM; some by means of judicial intervention and others by choice. Meanwhile, it took another seventeen years for the Dutch neighbour Germany to legalise SSM.

1.1   Problem statement and research question

The study of morality policies – including SSM – is a relatively new scholarly field that aims to uncover what distinguishes these types of policies from other policy fields, and examines which factors contribute to change in issues that are heavily debated in society. This scholarly field considers morality policies to be considerably different from other fields of regulation because the political processes are shaped by societal value conflicts rather than the divergence of material interests (Heichel, Knill & Schmitt, 2013, p. 318). Moreover, the "regulation of these value conflicts entails decisions about 'right' or 'wrong' and hence the 'validation of a particular set of basic values'" (Knill, 2013, p. 309). Typical morality policies are issues such as abortion, euthanasia, drugs, prostitution, gambling, and – unquestionably – SSM. Yet, many scholars claim that there is still a "remarkable lack of scholarly attention on morality policies" and that "comparative assessments of developments across countries [...] are rare" (Knill, 2013, p. 309). Moreover, Knill (2013) argues that for future research "a crucial question refers to

the extent to which classical explanations of change and variation still hold when it comes to morality policy" (p. 316). Therefore, it would be very useful to examine whether classical theories of policy change account for variation in the level (and timing) of permissiveness towards morality policies in countries.

By combining the above findings, this thesis aims to uncover which classical theory of the policy process best explains policy change of the specific morality issue of SSM in the Netherlands and Germany by conducting a congruence analysis. Two dominant – but competing – theories have therefore been selected for this thesis based on their expected explanatory strength: the Advocacy Coalition Framework (ACF) by Sabatier and the Discourse Coalition Framework (DCF) by Hajer. These theories have some common elements due to their focus on the competition between different *coalitions*. However, whereas the ACF focuses on the power of political coalition, the DCF focuses on the power of discourse as the prevailing source of policy change. The central research question of this thesis is therefore:

Which classical theory of the policy process – the Advocacy Coalition Framework or the Discourse Coalition Framework – best explains the legalisation of same-sex marriage in the Netherlands and Germany?

1.2   Theoretical and social relevance

Research is socially relevant if it addresses social problems. It "ideally increases citizens' political knowledge and awareness" (Gschwend & Schimmelfennig, p. 3; Lehnert, Miller & Wonka, p. 23). Since there is not one way to determine the social relevance of a research question, Lehnert et al. (2007) argue that the most important consideration should be whether people are *potentially* affected by the research (p. 29). Therefore, this thesis *is* socially relevant, because morality policies are by definition embedded in value conflicts and typically concern personal life choices of many individuals. The empirical dimension of this research particularly contributes to the social relevance of this thesis, because if there is an increased understanding of the processes that lead to morality policy change – either of a political nature or a discursive nature – it is easier to comprehend why the level of permissiveness towards morality policy issues in general, and LGBT rights in particular, is so different across countries. This also contributes to

the theoretical relevance. Furthermore, the theoretical relevance is particularly evident in the congruence analysis conducted in this thesis, as the entire aim of the study is to reveal which theory provides the most explanatory power. Lehnert et al. (2017) argue that a researcher can conduct theoretically relevant research by, amongst other approaches, "applying a theory to a new empirical domain" (p. 25). They claim that if theories can be meaningfully applied to new empirical phenomena, the researcher contributes to "a research community's knowledge about the degree of a theory's general character" (p. 25). Therefore, the theoretical relevance of this thesis is twofold, as it aims to contribute both to the literature on morality policies *and* the classical literature on policy change by combining the two – currently – different fields. As mentioned before, there is an absence in the existing literature as regards the degree to which classical public policy theories account for change in morality policy issues. Therefore, apart from the aim to contribute to the "struggle between scientific paradigms" (Blatter & Haverland, 2012, p. 170), this thesis also aims to reveal whether these classical theories provide powerful explanatory mechanisms for morality policies as well, and not just for more instrumental policies.

1.3   Design of the study

This thesis is divided into eight chapters. The second chapter will provide a review of the existing literature on the dependent variable: the legalisation of SSM and the variation in the degree of permissiveness. The third chapter provides a theoretical framework in which the theories will be selected and elaborated upon. Furthermore, based on these theories, hypotheses will be formulated that will serve as the foundation of this thesis. The fourth chapter will provide the research design that will be used for the eventual analysis and it will furthermore elaborate upon case selection, data selection, and the operationalisation and measurement of the hypotheses and variables. The fifth and sixth chapter will finally provide the analysis of SSM in the Netherlands and Germany respectively, after which the seventh chapter will discuss the results in relation to the selected theories. Finally, the concluding chapter eight will tie the thesis together and discuss the implications and the limitations of the research.

Chapter 2. Literature review

This chapter will review the existing literature on the factors – or independent variables – that explain variation in the dependent variable SSM. This is crucial in order to have an understanding of the factors that have already been identified to affect the eventual legalisation of SSM. Moreover, these need to be taken into account at a later stage for theory selection, case selection, analysis and conclusion. SSM is a relatively new social phenomenon, and has been one of the most salient issues in the politics of civil rights in the past three decades. SSM is a prime example of a "morality policy", which refers to specific issues that are deeply imbedded in value conflicts (Knill, 2013, p. 309). Heichel, Knill and Schmitt (2013) argue that policy change in morality policy is different from other fields of regulation because "societal value conflicts shape political processes rather than diverging material interests" (p. 318). Given the dominance of values and technical simplicity, Knill (2013) claims that morality issues often have much higher public participation, leading to high political salience of morality policies (p. 310). Heichel et al. (2013) demonstrate that there are several explanatory factors that distinguish *morality* policy change from that of other policy fields: the role of a problem pressure, religion, societal value conflicts and public opinion, party cleavages, the role of the judiciary, and international influences (p. 323). These factors will be incorporated in this literature review. However, given the dominance of public participation, it will firstly discuss the liberalisation of LGBT rights and the societal value conflicts surrounding SSM, before examining the political factors that contribute to variation in the degree of permissiveness towards SSM.

2.1   The liberalisation of LGBT rights

Fernández and Lutter (2013) claim that "since the end of the Second World War, the gradual expansion of legal rights for gays and lesbians have been one of the most important developments in the area of civil liberties" (p. 104). While these developments started off with the decriminalisation of homosexual activity and bans on discrimination in employment, Brown (2016) argues that a truly new normative context has only emerged in the past twenty years (p. 44). Siegel and Wang (2018) assert that since the New Social Movements emerged in the 1960s and 1970s, political conflict has

gradually shifted to issues of personal identity (p. 380). The rise of the gay liberation movement in the 1970s brought about national and international LGBT organisations. Nevertheless, it was not until the 1980s that these transnational LGBT networks started to explicitly use a 'human rights frame' to promote the recognition of sexual orientation (Kollman, 2007, p. 338). Kollman (2007) argues that the West European LGBT networks have been particularly successful in persuading intergovernmental institutions, in particular the EU, that the relationship rights of the LGBT community are *human* rights (p. 330). Indeed, the Treaty of Amsterdam in 1999 incorporated 'sexual orientation' in its anti-discrimination policy, meaning that it became legally anchored in all EU member states (Gerhards, 2010, p. 8).

Due to the relatively recent liberalisation of LGBT rights, the SSM phenomenon has only recently emerged and much of the controversy surrounding it therefore has to do with the meaning of marriage as an institution in society. Nussbaum (2010) claims that the meaning of marriage is not singular, but has three key dimensions. Marriage has a *civil rights* aspect, pointing to the rights that married people enjoy, such as government benefits in the form of favourable tax treatment. It has an *expressive* aspect by making a statement of love and commitment which is recognised and dignified by society. For many, this is considered to be a "definitive aspect of adult human freedom" (p. 669). And lastly, it often has a *religious* aspect, as for many people a marriage is not seen as valid unless it has been solemnised by the relevant religious authorities (p. 669). Nussbaum (2010) argues that the proponents of SSM generally predominantly focus on the expressive aspect of marriage: they promote the principle that everyone deserves their love to be acknowledged by society and the state. Contrarily, opponents often focus on the expressive *and* religious aspect, as they claim that marriage is traditionally a (religious) institution for heterosexual couples (p. 671).

2.2 Societal value conflicts

Of all reforms related to the legal rights of the LGBT community, SSM has spurred particularly intense controversy (Fernández & Lutter, 2013, p. 104). Since public opinion often has an important impact on developing morality policies, it is crucial to understand these attitudes in order to comprehend the differing policies with regards to

SSM. There is an abundance of literature on the factors that contribute to public support for, or disapproval of, homosexuality and SSM. Many scholars have considered the impact of religion on attitudes towards SSM and other morality policies. Heichel et al. (2013) claim that "morality policies are particularly sensitive to a society's religious stratification. Contrary to other policy fields, morality policies often touch upon issues that are central elements of various religious doctrines" (p. 325). Olson, Cadge and Harrison (2006) argue that religion has a great impact on negative attitudes, but that the degree of conservativeness towards morality and secularism of individuals determines whether they *actively* oppose SSM. Yen and Zampelli (2017) similarly demonstrate that religion reduces the likelihood of support for SSM, but that this disapproval can be attenuated by individual characteristics such as educational achievement, liberal political orientation, higher incomes, and a larger amount of contact with gay and lesbian people (p. 196). More scholars argue that social context plays an important role in the level of individual support for SSM. Merino (2013), Burnett and King (2015) and Yen and Zampelli (2017) all found that individuals that had LGBT people in their network were much more likely to support SSM. Merino adds that individuals with a higher percentage of religious conservatives in their core network were an exception (p. 1156), whereas Burnett and King argue that state-level variation in terms of social and political climate tempers the effect of contact on the level of support (p. 586).

Several scholars have considered the differing attitudes at a country level. Gerhards (2010) looks specifically at EU member states and the country-level differences in attitudes towards homosexuality. Taking into account the existing EU's anti-discrimination legislation, support was much lower than expected. The sense that homosexuality is justifiable in general was particularly low in recently acceded countries. Support for non-discrimination towards homosexuals was particularly high in Denmark, Sweden, and the Netherlands, whereas it was rather low in Portugal, Italy and Ireland (p. 21). Gerhards' causal analysis concludes that these attitudes can be explained by both the modernisation theory and the cultural heritage theory. More specifically, the value orientation of citizens – and thus their (dis-)approval of SSM – is influenced by both the level of economic development and the religious heritage of a country (p. 22). Adamczyk and Pitt (2009) combine religion and culture by looking at how cultural cross-national differences explain the role religion has in shaping attitudes towards

homosexuality. They make a distinction between survivalist and self-expressive cultural orientations. They hold that when a country is regularly confronted with economic and political uncertainty, people are more inclined to support norms and values that emphasize the familiar, leading to a survivalist cultural orientation. On the other hand, when countries undergo the process of industrialisation and modernisation, attitudes and values change from concerns about economic and physical security to attitudes that are increasingly tolerant, trusting and rational, leading to a self-expressive cultural orientation (pp. 339-340). Adamczyk and Pitt (2009) find that when cultures shift from survivalist to self-expressive orientations, attitudes towards homosexuality become more accepting (p. 348).

2.3   Political factors

Based on Heichel et al. (2013), there are six political factors that are likely to influence change in morality policy: the role of problem pressure, public opinion, religion (at the micro and meso level), party position and cleavages, the role of the judiciary, and international or transnational influences (p. 323). In this sub-chapter, these six factors will be examined.

First of all, Heichel et al. (2013) state that a "problem pressure" – shaped by changes in quantifiable problem indicators – is frequently assumed to be an important cause of policy change. However, they claim that morality policies often address "fundamental problems" that are not subject to the same problem pressures (p. 324). SSM is typically a fundamental problem because it concerns a decision about whether its principal aspects are socially acceptable or not, and therefore quantifiable problem indicators are of limited use (p. 324).

Secondly, the role of public opinion and societal values – as examined in the previous section – has proven to have a strong impact on moral policy making and therefore are believed to have a direct effect on the content of policy outcomes (Heichel et al, 2013, p. 327; Siegel & Wang, 2018, p. 377). Not only is public opinion a reflection of the prevailing societal values, it can also affect politicians' cost-benefit considerations for different morality policy stances (Heichel et al., 2013, p. 325).

Thirdly, as explained in the previous subchapter, religion has a strong impact on societal values and hence, support or disapproval of SSM. However, whereas most scholars focus on the level of religiosity in society, others have focused on the degree of institutionalisation of religion and how it directly affects (morality) policy-making. Several scholars agree that the more secularised a country's value system is, the more likely governments are to legalise SSU laws (Fernández & Lutter, 2013; Siegel & Wang, 2018). Knill, Preidel and Nebel (2014) examine the influence of religion on the long-term development of same-sex partnership and abortion policies in European countries, and thereby differentiate between the religious effect on policy content and the effect on the speed of reform (p. 846). They find that in both policy areas, countries have moved towards permissiveness regardless of their classification as Catholic or Protestant, which suggest that typical indicators of religion cannot explain variation in policy output (p. 861). However, their analysis of policy evolution over time shows that there are clear differences in the speed with which countries have moved towards permissiveness, as Protestant countries adopted permissive policies more quickly than Catholic and highly religious countries (p. 846).

Fourthly, party positions and cleavages are classical explanatory factors in public policy. It is generally assumed that left-leaning parties are more likely to take a liberal position on morality issues, whereas right-leaning parties are more likely to take a more conservative stance (Heichel et al., 2013, p. 327). Fernández and Lutter (2013) support this argument as they found that the partisan structure of governments in terms of left-right alignment particularly affect the timing of SSM legalisation, as countries with stronger left-wing parties have been much faster in the enactment of these reforms (p. 112). Moreover, in their research on six morality policies (including SSM), Budde, Heichel, Hurka and Knill (2017) found that political parties have a significant impact on a state's approach to morality issues (p. 445). However, they argue that the left-right alignment is too simplistic because when legislative action on a certain morality policy becomes necessary, party discipline in terms of left-right alignment is often weakened, which diminishes the control of political parties over policy outcomes (Budde et al., 2017, p. 445). Rather, they argue that morality policy is located "at the interface of different cleavages, including left-right and secular-religious dimensions, but also the conflicts between materialism and post-materialism, green-alternative-libertarian and

traditional-authoritarian-nationalist" (p. 427). Moreover, they argue that the relevance of different cleavages changes over time. Particularly, they argue that left and liberal party families that prioritise individual freedom over collective interests – rather than conservative/right and religious party families that prioritise order and societal values – pursue more liberal morality policies (p. 445). Therefore, they argue that none of the above-mentioned cleavages can explain the relation between partisan politics and morality policies on their own (p. 446). Similarly, Siegel and Wang (2018) claim that SSM legalisation does not depend on the left-right positioning of governments, but rather on their preferences for either 'traditional' or 'self-expression' values. By means of event history analysis, they show that governments or parties that favour post-materialist self-expression values are more likely to legalise SSM, irrespective of where they are located on the traditional left-right spectrum (p. 390).

Moreover, Engeli, Green-Pederson and Larsen (2013) consider morality issues in Western Europe and the variation in the permissiveness of regulation. In their research, they make a distinction between governments in the 'religious world' where there is a conflict line between secular and confessional parties, including the Netherlands and Spain, and governments in the 'secular world' without confessional parties, including Denmark and the United Kingdom (UK) (p. 336). Interestingly, their research on five morality issues (including SSM) shows that the latter group turned out to be less permissive on morality policies due to the lack of a conflict line, which is necessary to politicise morality issues (p. 334). Engeli et al. (2013) conclude that party conflict and party competition has thus driven the policy process in the 'religious world' where permissive legislation has been implemented when confessional parties were out of government (p. 336). Their findings suggest that the role of growing secularism, which is often seen as one of the key factors contributing to the legalisation of SSM(Siegel & Wang, 2018, p. 377), diminishes when there are no confessional ideologies present to be in competition with.

Fifthly, judicial intervention has often brought about morality policy change. Since morality policies often concern fundamental principles, such as human rights, individual freedoms and equal treatment, courts have frequently been found to have a great impact on morality policies (Heichel et al., 2013, pp. 328-329). Heichel et al. (2013) demonstrate that the legal recognition of same-sex partnerships has become a central

field of judicial activism. Whereas in some cases constitutional courts might serve in creating the initial problem definition, in other cases constitutional courts can have the power to serve as an agenda-setter by ruling on a specific case that forces the legislature to react (p. 329). Indeed, the legalisation of SMM was brought about by court rulings in South Africa, Brazil and the United States. From another perspective, Heichel et al. (2013) claim that "governments and legislature might intentionally refrain from intervening in a certain field because of high polarisation and the resultant high political costs and hence deliberately leave the issue 'to the judges'." (p. 329). Similarly, Budde et al. (2017) argue that "governments often leave decisions on contentious matters such as abortion, euthanasia, same-sex marriage, pornography and prostitution to external actors like courts." (p. 445).

Lastly, international and transnational influences are especially interesting with regards to SSM considering the relatively fast pace by which it has been legalised across countries. Policy diffusion and international court rulings increase public awareness of morality issues, and are therefore likely to have an impact on domestic agenda-setting processes (Heichel et al., 2013, p. 330). Several scholars assert that the rise of international or transnational LGBT movements has contributed to the legalisation of SSM across governments (Kollman, 2007; Siegel & Wang, 2018). Kollman (2007) tries to answer the question why a majority of western democracies have adopted SSU laws (such as registered partnerships) in a relatively short amount of time. She argues that this policy convergence can be explained to a large extent by the rise of a human rights oriented transnational network of LGBT activists that have been able to influence policy elites (p. 329). As partly stated before, Kollman (2007) claims that the LGBT networks have been particularly successful in convincing the European Court of Human Rights and other EU institutions of the salience of this human rights issue. Therefore, she illustrates how the strong transnational LGBT networks and the EU institutions have worked together and shaped policy-making in this field, and consequently encouraged the legalisation of SSM in several EU member states (p. 330). However, Kollman (2007) argues that these networks do not fully determine policy outcomes since not all western democracies have legally recognised same-sex relationships, and some have adopted different models of SSU laws. Therefore, she claims that the influence of these networks is mediated by the nature of – again – national religious practices and their cultural

implications, and by the perceived legitimacy of international norms by national publics and elites (pp. 353-354). Moreover, in her later book on the SSU 'revolution', Kollman's (2014) central contention is that an important catalyst for the adoption of SSU laws in western democracies has been "the process of international norm diffusion and socialisation" (Kollman, 2014, p. 2).Moreover, Fernández and Lutter (2013) conducted an event history analysis of the wave of SSU laws in Europe in the context of policy diffusion, and were particularly interested in the cross-national differences in the timing of SSU legalisation (pp. 103-105). In their analysis, they found strong support for 'world society theory', which holds that policy diffusion happens more rapidly when the policy conforms to general supranational values (pp. 105-106). Furthermore, they argue that since international cultural connections are particularly strong in Europe, it has a particularly great influence in this region (p. 105). Moreover, they found that the stronger the links of a European country to the "global cultural order", the earlier it was to adopt SSU laws (p. 112).

2.4   Implications of the literature review

This review has demonstrated that the liberalisation of LGBT rights has been one of the most important developments related to civil liberties in the past two decades. Moreover, scholars generally seem to find that the societal value conflicts and public opinion surrounding SSM are primarily shaped by religious and cultural factors. The political factors that have been identified to influence change in morality policy are more broad: the role of problem pressure, public opinion, religion, party position and cleavages, the role of the judiciary, and international or transnational influences. The main benefit of these findings is that it helps us to better grasp variation in the degree of permissiveness towards SSM both at the individual *and* at the political level. These findings help to select theories and cases in the next two chapters and contribute to a better understanding of what factors are possibly neglected in the selected theories.

Chapter 3. Theoretical framework

This chapter will first briefly consider policy change as the main focus of this thesis and the four classical perspectives on policy change, before taking into account some of the analytical implications for studying policy change of morality issues specifically. Based on these insights, it will elaborate on the selection of the two classical theories, after which the selected theories – the Advocacy Coalition Framework and the Discourse Coalition Framework – will be comprehensively clarified. Lastly, the two theories will be contrasted, and based on these insights hypotheses will be formulated that will serve as a foundation for the remainder of the thesis.

3.1   Policy change

Much of the policy sciences literature has been dedicated to explaining policy dynamics, which refers to policy stability as well as policy change. Thus, various theories attempt to provide accounts for the factors and processes that help to keep policies in place as well as for those that lead to policy change (Bekkers, Fenger & Scholten, 2017, p. 24). As Bekkers et al. (2017) claim "these frameworks theorise policy dynamics in a way that embraces various policy stages" (p. 243). Although often contested for being too simplistic, the policy cycle, which is a predictable rational illustration of the various policy stages, is illustrated in Figure 1. Some theories place emphasis on the importance of the agenda-setting stage as an explanation for policy change, some focus on the political struggles associated with the decision-making stage, while others focus
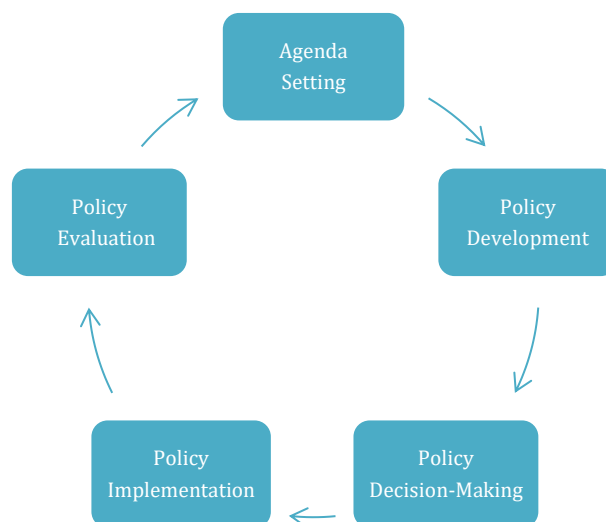
Figure 1. The policy cycle (based on Bekkers et al., 2017, p. 12).

on the importance of policy feedback in the policy evaluation stage (Bekkers et al., 2017, p. 243). Therefore, Bekkers et al (2017) argue that "policy change should not be seen as a separate or final stage of the policy process; rather it refers to patterns of dynamics in all stages of the policy process." (p. 243). However, the remainder of this thesis will solely consider "policy output", because when considering policy change in the case of SSM, solely knowing whether it has been legalised or not is much more relevant than the effects of the policy change. Moreover, a distinction can be made between 'incremental' and 'non-incremental' policy change. Incremental policy change involves minimal and gradual policy adjustments, meaning that it involves both a low degree of change and a slow pace of change (Bekkers et al., 2017, 244). For example, subsidising solar panels as part of the transition to sustainable energy sources is a minor policy adjustment and does not affect the fundamental ideas surrounding sustainability. Non-incremental change, by contrast, usually involves fundamental change, as it challenges ideas on which an existing policy is based, as well as a rapid pace of change (Bekkers et al., 2017, 244). Here, the initial decision to make the transition to sustainable energy sources is a fundamental change. The legalisation of SSM is therefore usually a case of non-incremental change, as it typically involves a fundamental change in the ideas and beliefs surrounding marriage as an institution in societies (Heichel et al., 2013, p. 321).

3.2   Classical perspectives on policy change

Four different schools of thought consider different factors that account for policy change. Therefore, in order to be able to accurately choose theories at a later stage, it is crucial to largely understand all of these different perspectives. Therefore, based on Bekkers et al. (2017), this section will give a brief overview.

Firstly, for rationalists, knowledge and information are at the heart of the policy process, and policy learning is therefore considered to be the key driver of policy dynamics. The above policy cycle (Figure 1) is a clear example of a rationalist explanation of the policy process, as it is essentially a cycle of problem-solving attempts and evaluation, resulting in policy learning (Howlett & Ramesh, 2009, p. 3). Rationalists assert that policy change occurs as a direct response to policy learning.

Secondly, the political perspective emphasises the role of power, conflict and interests, and poses that the policy process is defined by a continuous conflict of competing values. Due to these conflicts, this perspective poses that decisions are often value-loaded and therefore holds that political power is used to advocate values and protect interests (Bekkers et al., 2017, p. 30). They thus assert that policy change is not the result of rational policy learning; rather policy change is the result of interest-driven actors that compete to change policies in accordance with their beliefs. Both material and immaterial resources play an important role in these competitions such as an actor's financial resources or an actor's decision-making power, but also manpower, time or authority (Bekkers et al., 2017, p. 256).

Thirdly, the social constructivist or cultural perspective asserts that our worldview and the challenges that one perceives are socially constructed through language, interaction, and other means of communication (Bekkers et al., 2017, p. 58). Berger and Luckmann (1966) were the first to bring the ideas of social constructivism to the table, and argued that "theoretical knowledge is only a small and by no means the most important part of what passed for knowledge in a society" and that our reality is mainly shaped by ideas, beliefs and discourses (p. 65). Therefore, policy learning is largely disregarded, or similarly seen as constructed. Rather, it asserts that learning involves the development of a shared language through which meaning is given to specific policy challenges (Bekkers et al., 2017, p. 64). However, in addition to the role of language, other means of communication such as images, metaphors and symbols are similarly important. To illustrate, the phrase "Je suis Charlie" after the *Charlie Hebdo* shootings to represent freedom of speech or the movie *The Inconvenient Truth* to show the effects of global warming contributed to a public understanding of certain political and public policy issues (Bekkers et al., 2017, p. 60). Social constructivists argue that a shared interpretation of a problem is a necessary precondition for policy making, collective action, and eventually policy change (Bekkers et al., 2017, p. 262).

Lastly, institutionalism stresses the importance of institutions and the social and historical context in which policy processes take place. Institutions are the formal and informal rules that exist in society, which are mainly based on roles, values and norms. These institutions greatly affect the ability of policy makers to understand the world, and therefore determine the course and content of policy processes (Bekkers et al.,

2017, p. 66). As Bekkers et al. (2017) explain: "The system of rules through which policies are created constrain the options that are available to these actors and therefore significantly predetermine the outcome of policy processes." (pp. 66-67). Therefore, an important concept is "path-dependency", which asserts that once a country or region has chosen a specific "path", actors are unlikely to change course, and if they do, incremental policy change is most likely. Non-incremental policy change can only be the result of complex positive feedback processes (p. 269).

3.3   Morality policy change

Whereas the previous sub-chapter has elaborated on the different perspectives on policy change more generally, this sub-chapter will consider morality policy change specifically. It will first examine some of the distinctive features of morality policies in order to assess some of the analytical and theoretical implications for studying policy change of morality issues.

First of all, Knill (2013) argues that there are three different policy conceptions of morality policies that either emphasise politics, framing or policy substance (p. 310). The first conception focuses on the politics of morality policy. It perceives morality policy not necessarily as a genuinely distinct policy type, but considers that certain process patterns *make* morality issues distinct, such as: the presence of political conflicts over basic values; the technical simplicity of these issues; broader public participation; and the high political salience resulting from these processes (p. 310). In other words, this conception assumes that certain issues become morality issues when the policy process allows them to be. The second conception asserts that morality policies do not exist by definition, but that certain issues can be strategically framed in moralistic terms. A basic feature of these 'morality frames' is that they place emphasis on moral principles over instrumental considerations (p. 311). To illustrate, gun control could involve an instrumental choice as a means to 'simply' decrease violence, but by framing it in a certain manner, it can *become* a moral issue. The third conception makes a distinction between morality and non-morality policies by focusing on policy contents: "Policies are considered morality policies if their regulatory substance is closely related to public decisions over societal values" (Knill, 2013, p. 311). Typical morality subfields in this

regard are: issues of life and death, such as abortion or assisted suicide; issues of sexual behaviour, such as pornography and same-sex recognition; issues of addictive behaviour, such as drug consumption or gambling; and, issues referring to basic decisions over the relationship between individual freedoms and collective values, such as gun control (Heichel et al., 2013, p. 320). Depending on the case and country, SSM could conceivably fall under each of these conceptions: there can be political conflict over the basic principle of marriage as an institution; both proponents and opponents can frame SSM as a moral issue; and, the policy content is typically closely related to societal values.

Moreover, Heichel et al. (2013) argue that there are some issues regarding the measurement and conceptualisation of morality policy. The first basic decision, they argue, is related to the stage in the policy cycle in which policy change should be measured. They make a more basic distinction between policy outputs and policy effects. Whereas the former is the direct result of the decision-making process, and thus defined by the content of a policy, the latter refers to the last stages of policy implementation and evaluation, and is thus defined by the effectiveness of a policy. They argue that there are often 'systematic implementation deficits' associated with morality policies (p. 320-321). However, as mentioned before, this thesis is solely interested in explaining variation in policy output – whether SSM has been legalised or not – since the aim of this study is not to explain variation in policy effects. Heichel et al. (2013) similarly argue that "a focus on policy outputs as a measure of policy change generally assumes that policy outputs reflect the preferences and intentions of the government." (p. 321). Therefore, this thesis will solely examine the processes that contribute to an eventual change in policy output.

3.4 Theory selection

Now that reflections have been made on the structure of the scientific discourse, theories can be selected for this thesis (Blatter & Haverland, 2012, p. 170). There are three important findings to keep in mind when selecting theories to examine morality policy change.

First of all, as has become apparent from the literature review, there are several factors that need to be taken into account when examining which factors explain variation in the level of permissiveness of countries when it comes to same-sex marriage specifically and morality policy more generally. The two dominant overarching explanatory mechanisms that attempt to explain variation have been (1) political and (2) cultural in nature. Thus, when considering morality policy change, it is crucial to take these into account. Secondly, as has been illustrated in the previous sub-chapter, the several conceptions of morality policies have indicated that the prominence of politics and/or framing, as well as policy substance, are distinctive for morality policies. Thirdly, it is important to focus on theories that emphasise policy outputs rather than effects, because this thesis is solely interested in *why* and through which processes some countries have legalised SSM, and not in the effects.

These findings have led to the decision to use one theory from the political perspective, and one theory from the constructivist perspective, which both take change in policy outputs into account. The rational perspective has not been selected because it cannot account for the obvious dominance of non-rational and non-material factors in shaping the policy process surrounding SSM. Moreover, even though it places much emphasis on existing norms and values, the institutional perspective has not been taken into account because it fails to accurately account for non-incremental policy change. Rather, two theories have been chosen that emphasise different factors that are relevant for the case of SSM, while both seek to explain change in policy output: the Advocacy Coalition Framework by Sabatier for the political perspective, and the Discourse Coalition Framework by Hajer for the constructivist perspective. The next two sub-chapters will examine these theories in detail and the last two sub-chapters will elaborate on the differences and similarities between the two. Based on these considerations, hypotheses will be formulated.

3.5   The Advocacy Coalition Framework

The ACF focuses on the power and influence of advocacy coalitions in shaping the policy process. An advocacy coalition is composed of people from various institutions at all levels of government who share a set of strong normative and causal beliefs, and who

are motivated to translate those beliefs into actual policy (Sabatier, 1988, p. 133). Most fundamentally, it is "an alliance of political groups in a policy subsystem sharing the same interests and ideas that come together to argue against other policy coalitions concerned with the same policy issues." (Fischer, 2003, p. 95).

The ACF depicts advocacy coalitions as sharing both policy beliefs and resources. The policy belief system of each coalition is organised into three levels (see Figure 2): the 'deep core', which are the fundamental normative beliefs; the 'policy core', which are the beliefs specific to a certain policy area; and the 'secondary aspects', which refer to a large set of narrower beliefs concerning policy instruments, or the perception of the seriousness of an issue (Sabatier, 1988, p. 103-104). In other words, it asserts that there is a 'hierarchy of beliefs' from strongest to weakest. Sabatier (1998) argues that the deep core beliefs are highly resistant to change, as it refers to fundamental norms and values, such as the familiar left-right scale. The policy core beliefs are somewhat less resistant to change, dependent on the normative dimension of the beliefs, whereas the secondary aspects of the belief system are more readily adjusted as the result of policy learning (pp. 103-104). Therefore, policy change is often likely to be only incremental as it concerns changes in the secondary aspects. Non-incremental or major policy change can thus only be the result of changes in either the policy core or the deep core beliefs, but these are only likely to occur when the dominant advocacy coalition changes (Sabatier & Weible, 2007, pp. 198-199).
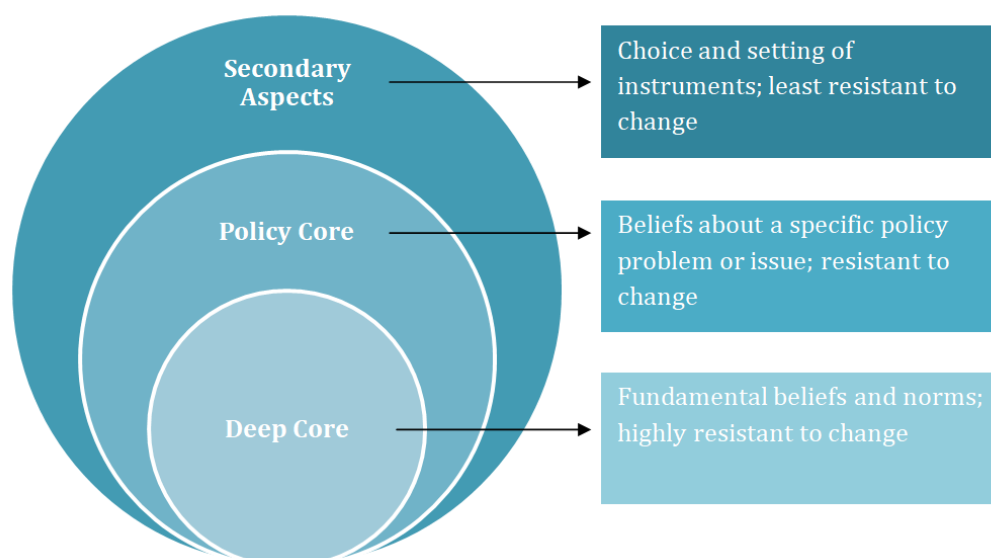
Figure 2. The policy belief system in the ACF (based on Sabatier, 1988, p. 145).

As can be seen in Figure 3, the ACF includes two sets of exogenous variables, which affect the constraints and opportunities of subsystem actors, the one fairly stable and the other more dynamic (Sabatier, 1988, p. 132). The "relatively stable parameters" include the basic attributes of the problem, the basic distribution of natural resources, fundamental sociocultural values, and the basic constitutional structure. These stable factors change only very slowly and therefore usually sustain relative policy stability. However, they are important in establishing the constraints and resources with which subsystem actors must operate. The dynamic external events include: (1) changes in socioeconomic conditions, such as the rise of social movements; (2) changes in public opinion, for example regarding the relative urgency of a particular problem; (3) changes in the governing coalition, and (4) policy decisions from other subsystems. This second set of external factors is more likely to change within a shorter amount of time, and according to the ACF, they are "a critical prerequisite to major policy change" (Sabatier, 1998, p. 103). These dynamic external factors tend to affect the behaviour of subsystem actors and are a necessary – yet not sufficient – condition for major policy change (Sabatier, 1988, pp. 135-136; Sabatier & Weible, 2007, p. 193; p. 199).
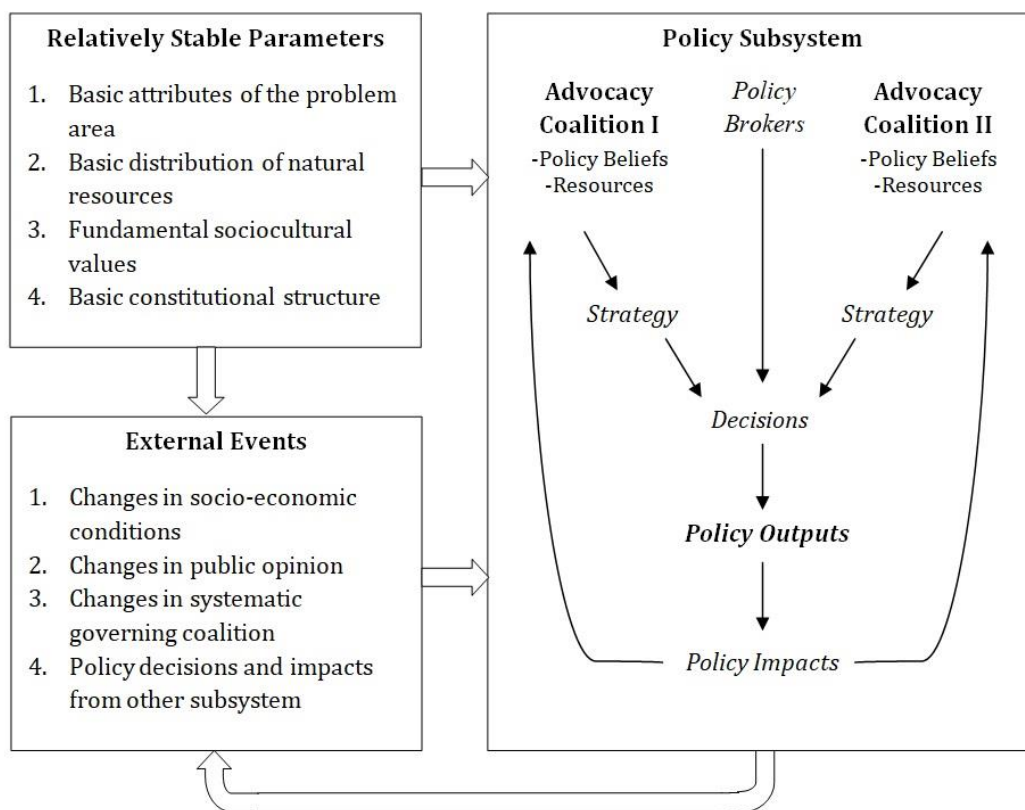
Figure 3. Schematic overview of Advocacy Coalition Framework (Sabatier, 1998, p. 102).

These external changes thus provide an opportunity for major policy change, as it often changes the "balance of power" between advocacy coalitions. Therefore, a new government or coalition coming to power may have a major effect on the resources of a specific advocacy coalition (Bekkers et al., 2017, p. 259). However, such major change can only occur if an advocacy coalition skilfully exploits such as opportunity in order to further their objectives (Sabatier, 1998, pp. 118-119). Therefore, the strategy through which advocacy coalitions exploit its resources is crucial. Resources can be both material and immaterial, and include: formal legal authority to make policy decisions; public opinion; information; mobilisable troops; financial resources; and skillful leadership (Sabatier & Weible, 2007, pp. 201-203). In sum, the most important effect of external shocks or events is the redistribution of resources and closing venues between advocacy coalitions, which "can lead to the replacement of the previously dominant coalition by a minority coalition" (Sabatier & Weible, 2007, p. 199). On the other hand, external shocks can also lead to a change in some components of the policy core beliefs of the dominant advocacy coalition (p. 199). Therefore, in sum, the ACF asserts that policy change is a function of both competition for power between advocacy coalitions within the subsystem, and of events outside of the subsystem (Sabatier, 2007, p. 9).

3.6   The Discourse Coalition Framework

The foundation of the Discourse Coalition Framework (DCF) by Hajer (1993) is the view that political problems are socially constructed. The narrative in which a certain issue or situation is discussed determines whether it is perceived to be a political problem (p. 44). To illustrate, the factual number of victims of hate crimes based on sexual orientation is *not* a social construct, but the way in which society discusses and makes sense of these hate crimes *is*. Hajer (1993) poses that a *discourse coalition* is the "ensemble of a set of story lines, the actors that utter these story lines, and the practices that conform to these story lines, all organised around a discourse" (p. 47). To elaborate, discourses are the concepts, ideas, and categories through which meaning is given to a specific phenomenon, and thereby they frame certain problems by emphasising the importance of certain aspects of a problem rather than others (p. 45). As such, the DCF places great importance on the role of language, or on what Hajer entitles the "discursive production of reality" (Hajer, 1993, pp. 44-45). The DCF poses that discourse coalitions

play an important role in shaping the interactions through which meaning is given to specific policy challenges, as they are a group of actors who share a specific social construct (Hajer, 1993, p. 45). However, these social constructs are highly dependent on the social and historical context in which they emerge; they do not arise in a historical vacuum. Moreover, they do not "float" in the world; they can be tied to specific institutions and actors (pp. 45-46).

Rather than advocacy coalitions, discourse coalitions consist of actors from various backgrounds that form coalitions around specific storylines. These storylines are the medium through which the discourse coalitions try to impose their view of reality on others, criticise other discourses and suggest specific social positions and practices (Hajer, 1993, p. 47). Therefore, the DCF poses that the content, course and outcome of the policy process is to be understood by looking at the interaction that takes place within and between different discourse coalitions (Bekkers et al., 2017, p. 64). A discourse coalition can come to dominate a specific political realm when it fulfils two conditions: *discourse structuration* and *discourse institutionalisation* (Hajer, 1993, p. 47).
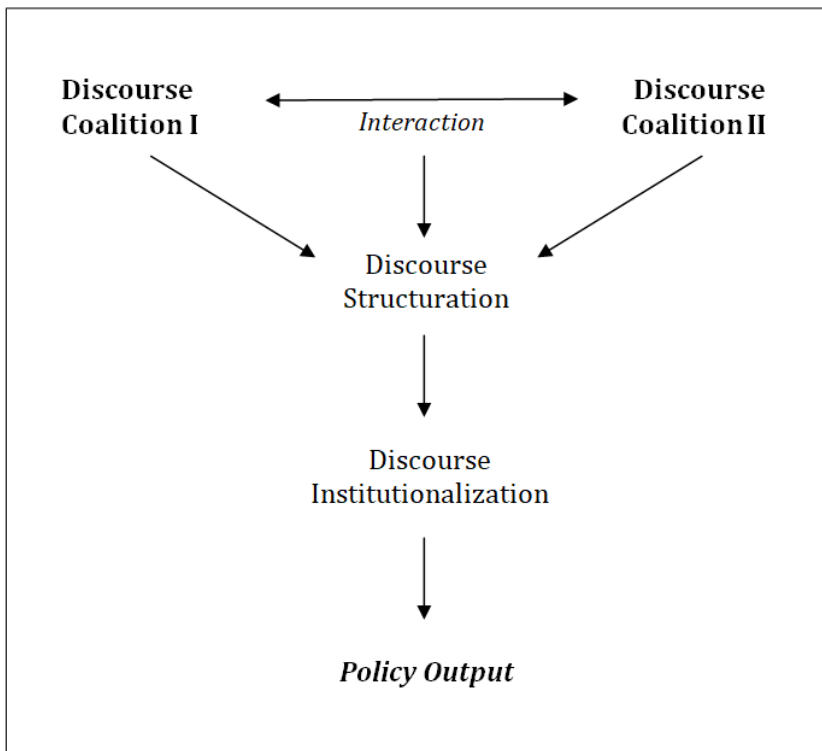
Figure 4. Schematic overview of the Discourse Coalition Framework: own interpretation (based on Hajer, 1993).

Discourse structuration occurs when a discourse starts to dominate the way a society conceptualises the world, or in other words, when "central actors are persuaded by, or forced to accept, the rhetorical power of a new discourse" (p. 46; p. 48). This process can take place when the media starts to use a new discourse that catches the attention of society, or when – not very relevant with regards to SSM – "experts" authoritatively bring in a new discourse (Bekkers et al., 2017, p. 268). The involvement of the media is therefore crucial in order for discourse structuration to take place. For example, when the media started to use the "fight against terror" discourse, society started to get a different understanding of the Iraq war and eventually even accepted the new discourse (Bekkers et al., 2017, p. 268). Discourse institutionalisation occurs when the discourse is reflected in the institutional practices of the specific political realm, or in other words, when "the actual policy process is conducted according to the ideas of a given discourse" (Hajer, 1993, p. 48). This is where the possibility for policy change comes in (see Figure 4): only if a discourse comes to dominate through both the mechanisms of structuration and institutionalisation, policy outputs can change (p. 48). Therefore, according to the DCF, SSM can only be legalised when the SSM discourse becomes favourable through both structuration and institutionalisation.

3.7   Contrasting the ACF and the DCF

The ACF and the DCF share both differences and similarities, which is unsurprising considering the fact that Hajer developed the DCF as a critique of the ACF. At that time, the ACF was the most widely discussed contribution to the policy sciences field due to its ability to identify and describe important aspects of policy change, but Hajer's critique of the framework was particularly that it was unable to explain *how* and *why* policy change comes about, and that it is too general to understand the social and historical context in which policy change takes place. However, the counterargument is that the ACF has been developed in such a way that it is applicable to a wide range of social contexts and is therefore more universally applicable (Fischer, 2003, p. 101).

Both theories focus on coalitions, which are shaped by actors that share certain beliefs and compete for attention. However, there *is* a significant difference between advocacy and discourse coalitions. Whereas advocacy coalitions are alliances of political groups,

which are held together by interests and belief systems, discourse coalitions are held together by language and storylines. The latter may also include actors with competing interests who have been "persuaded" by a specific discourse. Moreover, an advocacy coalition predominantly includes political actors, while discourse coalitions are likely to include a wider variety of actors. Moreover, there is also a difference in the degree of organisation. Whereas advocacy coalitions are organised by shared mobilisation, discourse coalitions spread the diffusion of a specific discourse (Bekkers et al., 2017, p. 267).

Furthermore, although both theories claim that policy change occurs when one coalition "wins" over another coalition, the most fundamental difference is the mechanism through which this process occurs. The ACF asserts that the *political power* of a specific advocacy coalition determines whether it becomes successful in achieving policy change. This power can be enhanced by resources and strategies, which can only change when external events take place. In such manner, the ACF asserts that the core beliefs of political actors are so resistant to change that they must rely on power and resources to bring about change. By contrast, the DCF asserts that *discursive power* is what determines whether a discourse coalition is successful. Only when a certain discourse coalition is able to persuade others of their discourse, and dominate in a political realm, is it able to change policies. According to the DCF, political actors *can* change their core beliefs when they become convinced of a discourse. In such manner, a conservative government could hypothetically be convinced of liberal ideas, and vice versa.

In sum, whereas the ACF focuses on actors and takes into account strategic factors that lead policies to change, and asserts that core beliefs are highly resistant to change; the DCF focuses mainly on the language of actors, is capable of taking the social and historical context of policy change into account, and asserts that core beliefs can change because of discursive power. Therefore, the crucial difference is that whereas the ACF holds that policy change happens when the dominant *advocacy coalition* changes, the DCF claims that policy change happens when the dominant *discourse* changes.

3.8   Formulating hypotheses

Based on the insights of the previous sub-chapters, measurable hypotheses are formulated in this section for both the ACF and the DCF to be able to examine the central research question in the next chapters.

3.8.1   The ACF: hypotheses and variables

Although it is quite an extensive theory, the explanatory mechanisms of the ACF are clearly political power and resources. According to the ACF, there are two main mechanisms through which policy change can occur: when the dominant advocacy coalition changes, or when the existing dominant coalition changes its core beliefs. However, since core beliefs are highly resistant to change, the latter would be unlikely to occur according to this theory, especially with regards to moral issues like the legalisation of SSM. Therefore, the hypothesis focuses on the first mechanism. In that regard, the most important finding from the ACF is that it seeks to explain when non-incremental major policy change occurs: when external events enable advocacy coalitions to improve their resources and strategy, thereby becoming the new dominant advocacy coalition. Moreover, Sabatier and Weible (2007) argue that the most crucial resource that an advocacy coalition can have is the 'formal legal authority to make policy decisions' and claim that "one of the most important features of a dominant coalition is that it has more of its members in positions of formal authority than do minority coalitions" (201-203). This resource can be perceived mainly by looking at the political parties in power and their standpoints. Therefore, when applying the ACF to the case of SSM legalisation, this research is most interested in whether the legalisation is caused by a change in the coalition, and not by all the factors that could influence the change in coalitions. Therefore, the "external events" of the ACF are not addressed as such, because it would require extensive process-tracing, which is beyond the scope of this thesis. Most fundamental to the theory is the notion that policies can change when there is a new coalition in power with the resources to change something. These findings have led to the following hypothesis (H), independent variables (X) and dependent variable (Y):

H1: *A new coalition of political parties in power (X1) has increased the political power of the advocacy coalition in support of same-sex marriage (X2), leading to the legalisation of same-sex marriage (Y).*

    X1:   Governing coalition

    X2:   SSM standpoints of political parties

    Y: Legalisation of SSM

3.8.2   The DCF: hypotheses and variables

The most important finding from the DCF is the notion that non-incremental major policy change can only occur when a new discourse coalition comes to dominate the political realm through the mechanisms of discourse structuration and discourse institutionalisation. Moreover, a major difference with the ACF is that a "winning" discourse does not necessarily need to conform to the views of the political parties in power. A dominant discourse first has to go through 'discourse structuration', meaning that it starts to dominate in society, before it becomes 'institutionalised' and policies change. As mentioned before, the involvement of media is crucial to achieve discourse structuration. Therefore, when applying the DCF to the case of SSM, the involvement of media is crucial to the development of discourse coalitions, the expansion of a discourse in favour or against SSM, and the eventual mechanisms of discourse structuration (X3 and X4) and discourse institutionalisation (Y). These findings have led to the following hypothesis (H), independent variables (X) and dependent variable (Y):

H2: *The increasing involvement of the media (X3) has ensured that the discourse in support of SSM has gained widespread support in society (X4), leading to the legalisation of SSM (Y).*

    X3:   Involvement of media in supportive discourse

    X4:   SSM support in society

    Y: Legalisation of SSM

Chapter 4. Research design and methods

Whereas research itself is about providing answers to questions, a good research design ensures that "the answers are as valid as possible and are discovered as efficiently as possible" (Toshkov, 2014, p. 1). First, the choice has been made between two alternative research designs: quantitative or qualitative research. Gschwend & Schimmelfennig (2007) claim that these designs "differ in the way in which they leverage available empirical information" (p. 10). Whereas quantitative research studies rely on large data-set observations that test causality, case study designs rely on within-case analysis or cross-case comparisons "to better understand the causal mechanisms of the relationship and phenomena of interest" (p. 10). The benefit of small-N research is that focusing on only a few cases allows for multidimensional conceptualisation of variables, and has more concept validity (Blatter & Haverland, 2012, p. 34). Moreover, case study research allows for historical explanations and addressing complex causal relationships (Bennet, 2004, pp. 37-38). Due to the nature of this thesis, which tries to uncover complicated policy processes, a case study design is most suitable as it allows the researcher to use a wider variety of sources and to track the policy process in-depth.

There are two main case study designs: co-variational analysis and congruence analysis. The typical goal of co-variational analysis is to establish whether a certain factor has an effect (Blatter & Haverland, 2012, p. 33). This type of analysis is thus typically X-oriented research, meaning that it looks specifically at the effect of an independent variable on the outcome (Blatter & Haverland, 2012, p. 36). Since the research question of this thesis is Y-oriented as it aims to comprehensively asses several contrasting mechanisms (X) that possibly account for variation in the dependent variable (Y), a co-variational design is unsuitable. Therefore, a congruence analysis has been selected for this thesis, which will be elaborated upon in the next sub-chapter. Furthermore, this chapter will consider case selection, data selection, and the validity and reliability of this research design.

4.1   Research method: congruence analysis

The aim of this thesis is to test the applicability of classical policy change theories to morality issues, and SSM specifically. Therefore, a congruence analysis has been selected as the research design of this thesis. Blatter and Haverland (2012) argue that a

congruence analysis is a research design in which case studies are used "to provide empirical evidence for the explanatory relevance or relative strength of one theoretical approach in comparison to other theoretical approaches" (p. 144). The first step is to deduce theories to "specific propositions and their observable implications". Then, one needs to compare this broad set of empirical observations with these implications to test the strength of these theories (Blatter & Haverland, 2012, p. 144). These implications have been formulated in the form of hypotheses in the previous chapter. This type of research design seems to be most suitable with regards to the central research question, which takes the classical theories as an analytical starting point.

There are two types of congruence analysis, namely a complementary theories approach and the competing theories approach (Blatter & Haverland, 2012, p. 145). This thesis uses the latter, as the theories that have been selected in the previous chapter, the ACF and the DCF, are competing. Although the theories both focus on coalitions of proponents and opponents of change, the main difference is their emphasis on *political* power versus *discursive* power as a source of policy change. Moreover, although these theories show similarities in some respects, they are both from different schools of thought within the policy change literature: from the political and constructivist perspectives respectively. By testing and comparing these theories on their relative strength, this thesis aims to "contribute to the scholarly struggle between scientific paradigms" (Blatter & Haverland, 2012, p. 170). Moreover, although a congruence analysis is suitable for a within-case method of analysis, this congruence analysis will be done comparatively by selecting two case studies in order to be able to make more meaningful conclusions about the relative strength or weakness of the ACF and the DCF.

4.2   Case selection

Blatter & Haverland (2012) claim that when conducting a congruence analysis, theory selection comes first and case selection comes second (p. 147). Since the theories have already been carefully selected in the previous chapter, it is now crucial to critically choose cases with reference to the selected theories. One of the most common limitations of case study methods is that they are likely to be subject to a "selection bias" (Bennett, 2004, p. 39). For instance, selecting cases *solely* on their historical relevance or

choosing easily researched cases is unlikely to be theoretically informative (p. 41). Therefore, this sub-chapter extensively and critically considers case selection. Blatter & Haverland (2012) argue that it is most important to consider both contextual factors within the case, and to consider how the selected case is related to the theories (p. 177). Moreover, they argue that it is important to choose 'crucial cases'. Crucial cases for a congruence analysis that tests dominant or established theories are 'most-likely' cases (p. 176). The advantage of selecting 'most-likely' cases is that when a theory is still challenged even under the most favourable circumstances, meaningful conclusions can be made about the weakness or strength of one theory over another, which is why an effort will be made to choose cases that are most likely for *both* cases (p. 177).

In Table 1 (next page), an overview is presented of the countries in the world where SSM has been legalised, and includes the year of implementation, the continent, the source of policy change and three relevant indicators. Firstly, the table considers how the cases are related to the theories. As has been mentioned before, this thesis will not consider cases where the legalisation of SSM has been brought about by judicial intervention, and countries where SSM has been legalised by referendum will also be neglected. This is because legislative acts as a source of policy change tells us much more about complex policy process at the government level, particularly because the theories used in this thesis are based on this level and do not take into account judicial intervention or referenda. Moreover, for both the ACF and DCF 'most likely cases' are presumably countries that are very democratic, because both theories assert fair and equal competition between coalitions, leading to eventual policy change. Therefore, the Democracy Index of the Economist Intelligence Unit (EIU) (2010) has been included, and countries that score below 8.0 – and are in the EIU's terminology considered to be less than "full democracies" – will not be included in the analysis.

Secondly, the table includes contextual factors that are relevant within cases, which are based on the findings from the literature review. It includes the importance of religion per country, because religion has proven to very strongly impact the permissiveness of countries towards SSM. This indicator is based on a Gallup poll of 2009 where people were asked "Is religion important in your life?". Only countries where more than 50 percent of the population answered "no" will be considered. Furthermore, the table

Same-Sex Marriage: the power of politics or the power of discourse?

	Country[1]	Year of Legalisation	Continent	Source of Policy Change			Relevant Indicators		
				Legislative Act	Judicial Intervention[2]	Referendum	Democracy Index[3]	Importance of Religion[4]	WVS Cultural Map Grouping[5]
1	Netherlands	2001	Europe	✓			8.99	67%	Protestant Europe
2	Belgium	2003	Europe	✓			8.05	58%	Catholic Europe
3	Spain	2005	Europe	✓			8.16	51%	Catholic Europe
4	Canada	2005	NA	✓			9.08	57%	English Speaking
5	South Africa	2006	Africa		✓		7.79	15%	Africa
6	Norway	2009	Europe	✓			9.80	78%	Protestant Europe
7	Sweden	2009	Europe	✓			9.50	82%	Protestant Europe
8	Portugal	2010	Europe	✓			8.02	26%	Catholic Europe
9	Iceland	2010	Europe	✓			9.65	n/a	Protestant Europe
10	Argentina	2010	SA	✓			6.84	34%	Latin America
11	Denmark	2012	Europe	✓			9.52	80%	Protestant Europe
12	Brazil	2013	SA		✓		7.12	13%	Latin America
13	France	2013	Europe	✓			7.77	69%	Catholic Europe
14	Uruguay	2013	SA	✓			8.10	59%	Latin America
15	New Zealand	2013	Oceania	✓			9.26	66%	English Speaking
16	Luxembourg	2015	Europe	✓			8.88	59%	Catholic Europe
17	United States	2015	NA		✓		8.18	31%	English Speaking
18	Ireland	2015	Europe			✓	8.79	46%	English Speaking
19	Colombia	2016	SA	✓			6.55	16%	Latin America
20	Finland	2017	Europe	✓			9.19	70%	Protestant Europe
21	Malta	2017	Europe	✓			8.28	10%	n/a
22	Germany	2017	Europe	✓			8.38	59%	Protestant Europe
23	Australia	2017	Oceania			✓[6]	9.22	68%	English Speaking

Table 1. Case selection: 'most-likely' cases in grey; selected cases in blue.

[1] Subnational entities (England & Wales, Scotland, Greenland and the Faroe islands), and countries where SSM cannot be performed in the entire state (e.g. Mexico) are excluded from this list.

[2] Judicial intervention means that SSM has been legalised through court rulings rather than legislative acts. This excludes countries were court rulings played an important role in creating a legislative act.

[3] Democracy Index of 2010 by the Economist Intelligence Unit (2010).

[4] Based on a 2009 Gallup Poll which asked "Is religion important in your life?". Percentage of the respondents who answered "No" (Crabtee, 2010).

[5] Based on World Values Survey (WVS) Cultural Map groupings (World Values Survey, 2018).

[6] 'Voluntary postal survey' instead of referendum.

includes the Inglehart-Welzel – or World Values Survey (WVS) – Cultural Map groupings from the period 2010-2014 (see Appendix A, page 83). The Inglehart-Welzel Cultural Map is based on two sets of values: traditional versus secular-rational values on the y-axis; and survival versus self-expression values on the x-axis (World Values Survey, 2018). As established in the literature review, countries where secular-rational values and self-expression values are higher, are more likely to legalise SSM and are therefore considered to be 'most likely cases'. In the Cultural Map, countries that score high in both sets of values are grouped into "Protestant Europe" (World Values Survey, 2018). Lastly, for all of these indicators, the median years of 2009/2010 have been chosen in between the first year that SSM was legalised in 2001 and the last year in 2017.

In sum, this thesis asserts that 'most likely cases' with regards to SSM are countries where SSM has been legalised through a legislative act; where religion does not play an important role in people's lives; where secular-rational and self-expressive values are high; and which are fully democratic. Based on these indicators, a selection has been made of six countries that are 'most likely cases' (in grey): the Netherlands, Norway, Sweden, Denmark, Finland and Germany. However, due to several limitations related to time as well as language barriers, this thesis will conduct the case study on only two of them: the Netherlands and Germany (in blue). These two countries are especially interesting because – at the time of writing this thesis – the Netherlands and Germany were the first and last country in the world to legalise SSM through a legislative act respectively.

4.3   Data selection

Blatter and Haverland (2012) argue that the type of data used for a congruence analysis, as well as the methods to collect and produce this information are very diverse. Whereas some researchers only use existing scholarly literature and newspaper articles, others use a wide variety of primary and secondary sources. However, they argue that most analysts collect existing information and data, rather than producing their own data (pp. 187-188). Yin (2003) argues that with a small-N study, more data can be derived from a wider variety of sources, such as newspaper articles, documentation, and archival records. A method of 'data source triangulation' will be applied in this thesis, which

means that the research combines a wide variety of primary (e.g. legislation, policy documents) as well as secondary sources (e.g. journal articles, newspaper articles, reports) that will be used for each independent variable (Blatter & Haverland, 2012, p. 144). Below, each hypothesis and independent variable will be considered and a description is given of the operationalisation and measurement of each of the variables.

4.3.1 Operationalisation and measurement of variables

H1: *A new coalition of political parties in power (X1) has increased the political power of the advocacy coalition in support of same-sex marriage (X2), leading to the legalisation of same-sex marriage (Y).*

One of the basic premises of the ACF is that "understanding the process of policy change requires a time perspective of at least a decade or more" (Sabatier, 1988, p. 131). For this hypothesis it is therefore important to address changes in the governing coalition and viewpoints in the decade leading up to the legalisation of SSM.

X1 Governing coalition

The governing coalition in power is crucial in the ACF as one of the most important features of a dominant advocacy coalition is that is has more 'formal legal authority to make policy decisions' (Sabatier & Weible, 2007, p. 201). Therefore, the changes in the governing coalitions in the Netherlands and Germany in the decade leading up to the legalisation will be analysed. First, the seat distribution as a result of the parliamentary elections in both countries will be analysed, before considering the governing coalitions that were formed. The seat distribution is also relevant, because knowing the size and composition of the opposition helps to understand the political climate in both countries, and helps to give a prediction of the likelihood of reform. This data will be derived from official government websites and processed in tables to give an overview of the political changes that occurred in both countries during the relevant time period.

X2 SSM standpoints of political parties

The standpoints of political parties – both in opposition and in coalition – are crucial to the development of policy issues. The ACF asserts that the core beliefs of advocacy

coalitions are highly resistant to change, and it is therefore interesting to see whether the governing parties have altered their beliefs on SSM in the decade leading up to its legalisation. The hypothesis asserts that a new powerful coalition emerged that had preferences and values that supported the legalisation of SSM. Therefore, this independent variable is crucial, since if (the majority of) the new governing coalition does *not* have supportive preferences and values, the hypothesis is automatically false. It is therefore important to examine the party lines of the relevant political parties in the Netherlands and Germany and their positions on SSM in the decade leading up to its legalisation. This will be done by examining the official election programs of all political parties – both in coalition and in opposition – of the three elections leading up to the legalisation of SSM in the Netherlands and Germany. Lastly, the eventual vote on the SSM bill will be analysed to see whether it matches (the majority of) the governing coalition.

H2:   *The increasing involvement of the media (X3) has ensured that the discourse in support of SSM has gained widespread support in society (X4), leading to the legalisation of SSM (Y).*

The most important aspect of this hypothesis is to first identify the relevant discourses in relation to the legalisation of SSM. This will be done by consulting secondary literature on different discourses. Moreover, whereas the ACF prescribes a clear time perspective, the DCF does not give any recommendation in that regard, since this is dependent on when the debate started to become politicised. Therefore, a time perspective of a decade will also be used for the analysis of the hypothesis. After the relevant discourses have been identified, the first mechanism that is of interest is 'discourse structuration'; whether a specific discourse has become the dominant one in society. This mechanism is tested by assessing the two independent variables (X3 and X4). After all, the DCF asserts that policies can only change *after* discourse structuration has taken place, through discourse institutionalisation (Y).

X3   Involvement of media in supportive discourse

As explained in the previous chapter, the media can be influential in spreading a discourse. After having identified the specific discourses, the newspapers will be selected and all articles in the decade leading up to the legalisation of SSM will be analysed. Based on the identified discourses, the article will be codified into three

different categories: a supporting discourse, an opposing discourse, and a neutral discourse. Therefore, the involvement of the media in a specific discourse will be based on the amount of newspaper articles found in the databases Delpher (2018) and LexisNexis (2018) that advocate or mention the supporting discourse in contrast to the opposing or neutral discourse. Due to the fact that a lot less was written on this topic in the relevant time period in the Netherlands, five newspapers will be analysed for the Dutch case (*Algemeen Dagblad, NRC Handelsblad, de Telegraaf, Trouw,* and *de Volkskrant*), whereas three newspapers will be examined for the German case (*der Tagesspiegel, die Tageszeitung,* and *die Welt*). All the articles that have been published in the relevant time span on SSM will be examined and codified into three categories: a supporting, an opposing and a neutral discourse. If the supporters' discourse is not (increasingly) dominant in either analysis, the hypothesis is automatically false.

X4 SSM support in society

In order to assess the support of SSM in society, public opinion polls will be consulted in the relevant time span. This independent variable is very important in order to be able to assess whether the first mechanism of 'discourse structuration' has taken place. According to the DCF, the second mechanism 'discourse institutionalisation' – or major policy change – can only take place when the first mechanism has been realised in society. Therefore, if SSM support has *not* increased in the decade leading up to its legalisation, the hypothesis is not supported.

		Independent Variable	**Data Selection**
ACF	X1	Government coalition in power	- Government websites on the results of the three elections, the eventual seat distribution and governing coalition.
	X2	SSM standpoints of political parties	- Election programmes of political parties - Official documentation on voting in Dutch House of Representatives and the Senate. - Official documentation on voting in the German Bundestag and Bundesrat
DCF	X3	Involvement of media in supportive discourse	- Delpher database - LexisNexis database - Newspaper websites
	X4	SSM support in society	- Public opinion polls by reliable government institutions or think thanks

Table 2. Data selection.

4.4   Data analysis

Blatter and Haverland (2012) argue that extensive data analysis is crucial for a congruence analysis, because its main goal is to conduct a systematic comparison of the collected empirical evidence with the expectations (hypotheses) deduced from the divergent theories (p. 188). There are four basic steps in a congruence analysis. The first step is to collect data. Secondly, the empirical information is compared with the hypothesis from theory A. This comparison is "based on interpretation and requires explicit reflection and justification", and can lead to differing results. The observations are either in line with the expectations, contradictory to the expectation, or they are neither in line with the expectations nor do they directly contradict them. Thirdly, the same comparison is made for theory B. And lastly, the results of the two comparisons are combined in order to evaluate the relative strength or relative weakness of theory A and theory B for the cases under investigation (p. 189). By applying these recommendations to the theories and cases addressed in this thesis, four clear steps have been identified to accurately conduct a congruence analysis, as visualised in Figure 5.

1. Data collection (Chapter 5 & 6)
2. Compare data with the Advocacy Coalition Framework and two cases (Chapter 5.2 & 6.2)
3. Compare data with the Discourse Coalition Framework and two cases (Chapter 5.3 & 6.3)
4. Combine results and evaluate relative strength/weakness of the ACF and DCF (Chapter 7)
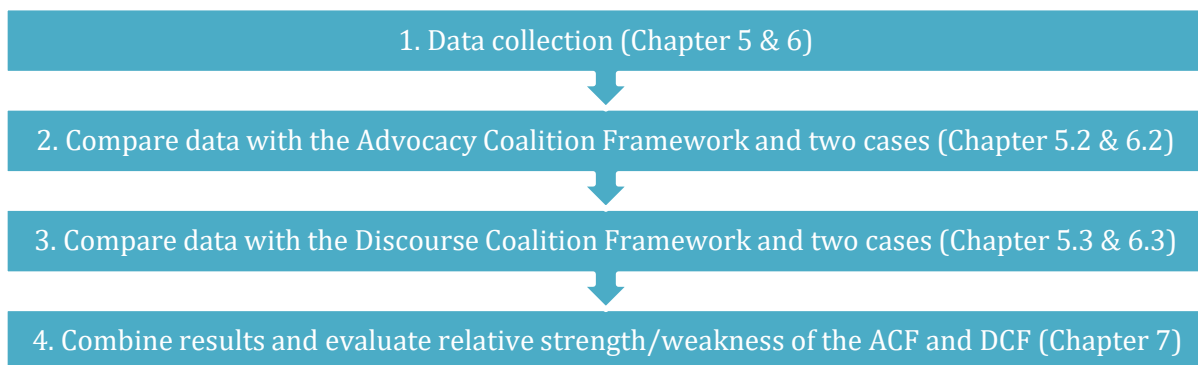
Figure 5. Steps in a congruence analysis used in this thesis.

4.4   Validity and reliability

It is crucial that research is both internally and externally valid, and that it is reliable. Internal validity is "the degree to which a study provides high levels of confidence about whether the independent variable causes the dependent variable" (Kellstedt, 2013, p. 89). Bennet (2004) argues that a comparative advantage of case study research is that it attains high levels of 'construct validity', meaning that it has a great ability to measure

indicators that best represent the theoretical concepts intended to measure in a case (p. 34). Many of the relevant variables used in this thesis, such as involvement of media or political views, are difficult to operationalise and measure. However, the design of this thesis allows for a "detailed consideration of contextual variables", which would be incredibly hard to carry out in a quantitative analysis (Bennet, 2004, p. 34). The design of this thesis therefore ensures a high level of internal validity.

However, Bennet (2004) claims that there is typically a trade-off between achieving a high level of internal validity, and establishing a high level of external validity (p. 34). External validity is "the degree to which we can be confident that the results of our analysis apply not only to the participants in the study, but also to the population more broadly construed" (Kellstedt, 2013, p. 89). The latter is achieved more easily by statistical studies, and therefore a limitation of this design is a lower level of external validity. However, due to an extensive method of data source triangulation, the level of external validity is enhanced as the evidence is based on a wide variety of sources. Moreover, the external validity is enhanced by using two case studies instead of one and more definite conclusions could be made that would apply to the population more broadly construed. Using even more case studies would be beyond the scope of this thesis.

Lastly, reliability refers to the extent to which the measurements are "repeatable and consistent" (Kellstedt, 2013, p. 92). The only area where the reliability might be at stake is the codification of newspapers articles. Therefore, the third 'neutral' discourse was added in order to make sure that the coding is consistent. The other variables have been repeatable because they concern either factual information or official documentations. Therefore, because the measurement of independent variables is conducted in a consistent manner for both case studies, the reliability of this research is high.

4.5   Limitations of the research design

Although the research design is solid in terms of the type of analysis, the theory selection, the case selection, and the validity and reliability of the research, there are a few minor limitations, most of which are caused by reasons related to time and scope of

the research. First of all, a limitation could be that the hypotheses do not *fully* capture the theories. The ACF hypothesis could capture the entire theory more comprehensively if each of the 'external events' were addressed individually. However, the main interest is to reveal whether the dominant advocacy coalition changed, and not what the individual events were that caused that change. For example, including a hypothesis on the variable "changes in socio-economic conditions" would not contribute to a better understanding of the strength of the ACF. Moreover, according to Fischer (2003), Sabatier has had the desire to develop a framework that is universally applicable to the widest range of social context (p. 101). Therefore, for any researcher applying the ACF, it is necessary to take out the relevant "ingredients" in order to be able to use such a broad theory in relation to their specific case. Therefore, also due to time and the scope of this thesis, the decision has been made to extract the most relevant hypothesis from this theory in relation to the case of SSM legalisation.

Furthermore, the DCF hypothesis might not capture the entire theory because there are arguably more ways through which a discourse can spread than through the medium of newspapers alone. Social media, for example, has undoubtedly played a role in spreading a discourse in the German case. However, social media could not be included because it did not yet exist at the time of Dutch SSM legalisation, and it was important to create a consistent research design for both case studies in order to make reliable conclusions. Moreover, there are two possible limitations related to the operationalisation and measurement of the independent variables of H2. The first is that a time perspective of a decade was used for the analysis, even though the discourse started much earlier, especially in the German case. The second is that more newspapers could have hypothetically been used for this part of the analysis. However, it was beyond the scope of this thesis to examine *more* newspapers over a *longer* period of time, since the current analysis already includes more than three hundred newspaper articles. Nevertheless, in order to make sure that the analysis is representative for the Dutch and German media, newspapers have been chosen from different political alignments.

Chapter 5. Analysis of same-sex marriage in the Netherlands

This chapter will provide an in-depth analysis of the policy process towards the legalisation of SSM in the Netherlands. It will first briefly discuss the Dutch context in which the SSM debate emerged and the events leading up to its legalisation in 2001. Thereafter, H1 and H2 will be tested in order to be able to assess the explanatory power of the ACF and DCF respectively.

5.1   Dutch context and events

From the 1960s onwards, major transformations occurred in Dutch society: the end of "pillarisation" – the vertical segregation in society based on religion or ideology – was accompanied by trends of secularisation and individualisation. Characteristic features of these "pillars" had been the dominance of own principles and the rejection of external influences. These features were increasingly challenged and many taboos were shattered (Wielenga, 2012, p. 339). Secularisation and other socio-economic changes paved the way for the liberalisation of gay rights, and many countries started decriminalising same-sex sexual activity and implementing legislation to combat discrimination on the grounds of sexual orientation (Kollman, 2017, p. 102). Moreover, the national LGBT rights organisation Centre for Culture and Leisure (*Cultuur- en Ontspanningscentrum;* COC) was already established in 1946, right after the Nazi occupation, and had acquired strong connections to liberal political elites (Kollman, 2014, p. 106).

The Netherlands used to combat homosexuality by making sexual contacts between adult men and boys under the age of 21 punishable (Heerma van Voss, 2011, p. 313). This age limit was decriminalised in 1971, and soon after the COC became the official and state-sponsored representative of the Dutch LGBT community (Kollman, 2014, 106).Since that time, the Netherlands has been progressive in terms of advancing LGBT rights and Dutch society was found to be increasingly tolerant of homosexuality (Kollman, 2017, p. 107). From that time, many Dutch people viewed the Netherlands as a 'guiding country' with regards to many morality issues as the country started implementing liberal policies concerning issues such as abortion, prostitution and euthanasia (Heerma van Voss, 2011, p. 319).

The trajectory towards SSM needs to be seen in this context, and the first steps towards its legalisation were made as early as the 1980s. Whereas Nordic countries pioneered in registered partnership (RP) laws for same-sex couples – with Denmark (1989), Norway (1993), Sweden (1995) and Iceland (1996) preceding the Netherlands in that respect – the Dutch SSM advocates refused to settle for this type of SSU and fought for SSM from the outset (Kollman, 2017, p. 101; p. 106). A coalition of legal activists and Henk Krol, the publisher of the high-profile LGBT magazine the *Gay Krant,* argued that true equality for same-sex couples could only be achieved by opening marriage. This coalition helped to launch court cases in the late 1980s that challenged the exclusion of same-sex couples from Dutch marriage law. However, the Supreme Court ruled in 1990 that only different-sex couples had a right to marry, but the Court *did* hint that withholding the benefits associated with civil marriage might be discriminatory. These events put the issue on the agenda and pressured the government to address this issue (Kollman, 2017, p. 106).

In 1994, the Netherlands adopted the Equal Treatment Act, which laid down general rules for the protection against discrimination and specifically included anti-discrimination on the ground of "hetero- or homosexual orientation" (*Algemene wet gelijke behandeling,* 1994, article 1b). This eventually turned out to be an important step in the trajectory towards the legalisation of SSM, as only two years later, a majority of the House of Representatives agreed that a marriage ban was in violation with the new Equal Treatment Act, and the 'Kortmann commission' was created to assess the possibility of opening up marriage to non-heterosexuals (van den Dool, 2017). During this time, the prime minister Wim Kok wanted to proceed cautiously by first implementing a Nordic-style RP law (Kollman, 2014, p. 110). A bill on the legalisation of RP for same-sex couples was legalised in late 1996, which went into effect on the 1st of January 1998. Apart from the Christian members of parliament (MPs), all the MPs voted in favour of the bill (*Kamerstukken II, 23761, nr. 41*, 1996).

Many LGBT activists dismissed the RP law as discriminatory and the SSM campaign was given increased momentum when the recommendations of the 'Kortmann Commission' were published, and the majority of the panel advised the government to open up marriage to non-heterosexuals (Kollman, 2017, p. 107). Therefore, after the elections of 1998, the re-elected 'purple' coalition agreed to implement this recommendation in their coalition agreement by stating: "In order to strengthen the equal treatment of

homosexual and lesbian couples, the government will submit legislation before 1 January 1999 in order to open up the civil marriage for persons of the same sex." (*Kamerstukken II, 26024, nr. 10*, 1998). The law was first proposed in July 1999, and passed in the House of Representatives and the Senate in late 2000 (*Kamerstukken II, 26672, nr. 100*, 2000; *Kamerstukken I 26672, nr. 15,* 2000). In such manner, the Netherlands became the first country in the world to legalise SSM in 2001, only three years after it has legalised RP in 1998 (Kollman, 2017, p. 101).

5.2   The ACF and same-sex marriage in the Netherlands

The following section will test H1 in order to assess the strength of the ACF. The governing coalitions in the decade leading up to the legalisation of SSM will first be considered, after which the standpoints of political parties – both in coalition and in opposition – will be examined. Lastly, the hypothesis will be tested.

X1   Governing coalition

As mentioned in the previous chapter, one of the basic premises of the ACF is that a temporal perspective is required of at least a decade leading up to the events. Therefore, the governing coalitions from 1989 until 2002 will be examined; a period in which major shifts occurred in the Dutch political landscape. Since 1977, the two major parties had steadily been the Christian democratic CDA and the social democratic PvdA, which had rotated in becoming the largest party in the elections ever since (PDC, 2018). Traditionally, Dutch voters were very loyal to one single party due to "pillarisation", and it was not until the 1990s that the trends of secularisation became highly visible in Dutch politics (Wielenga, 2012, p. 350). As can be seen in Table 3 (next page), the CDA lost almost half of its seats in the parliament over the course of two elections, whereas the conservative liberal VVD became much larger during this time. In such manner, the 1990s showed an increasing trend of secularisation, as the small Christian conservative parties did not fill the gap that the Christian democrats had left behind (PDC, 2018). The elections in 1994 formed a major turning point in Dutch politics, as it represented the end of long-lasting ties between political parties and their electorate (Wielenga, 2012, p. 350). Due to these shifts, and also at the time of SSM legalisation, the governing coalition was composed of the PvdA, the social liberal D66 and the right liberal VVD. This

coalition is often referred to as the 'purple' coalition due to the blend of party colours – social democratic red and liberal blue – and for the first time since the second world war, a coalition was formed without the participation of the Christian democrats (Wielenga, 2012, p. 350).

Party	Political Ideology	Term		
		1989-1994	*1994-1998*	*1998-2002*
CDA	Christian democratic	54	34	29
PvdA	Social democratic	49	37	45
VVD	Conservative liberal	22	31	38
D66	Social liberal	12	24	14
GroenLinks	Left green	6	5	11
SGP	Christian conservative	3	2	3
GPV	Christian protestant	2	2	2
RPF	Christian protestant	1	3	3
CD	Extreme right	1	3 (+2)	x
AOV	Elderly party	x	6	0
SP	Socialist	x	2	5
Unie 55+	Elderly party	x	1	0
Total seats		150		

Table 3. Dutch party seat distribution from 1989-2002. Grey: governing parties (PDC, 2018).

X2   SSM standpoints of political parties

For this part of the analysis, the SSM standpoints of the eight political parties that attained seats in each of the elections of 1989, 1994 and 1998 will be examined: CDA, PvdA, VVD, D66, *GroenLinks*, SGP, GPV and RPF. Their official election programs have been analysed for the three terms of office in order to assess their standpoints on SSM. In the absence of explicit standpoints about SSM, more implicit positions have been taken into account that affect the LGBT community and the advancement of SSM, such as standpoints on discrimination, adoption or RP. To illustrate, the position of the CDA in 1998 that adoption should be "solely for one man and one woman" (p. 17) indicates an unfavourable standpoint for the development of SSM. By contrast, the position of the green party *GroenLinks* in 1989 that it would initiate the Equal Treatment Act (p. 32) indicates a favourable standpoint for the advancement of SSM. A full overview of the original and translated standpoints is provided in Appendix B (page 84), and a summary of the findings is provided in Table 4 (below).

Party	Political Ideology	Term		
		1989-1994	*1994-1998*	*1998-2002*
CDA	Christian democratic	**<u>54</u>**	34	29
PvdA	Social democratic	**<u>49</u>**	**<u>37</u>**	**<u>45</u>**
VVD	Conservative liberal	22	**<u>31</u>**	**<u>38</u>**
D66	Social liberal	12	**<u>24</u>**	**<u>14</u>**
GroenLinks	Left green	6	5	11
SGP	Christian conservative	3	2	3
GPV	Christian conservative	2	2	2
RPF	Christian conservative	1	3	3

Table 4. Development of Dutch party positions on (the advancement of) SSM from 1989-2002; based on standpoints in the official election programs (see Appendix B). Governing parties in underscored bold. Green: supporting. Light green: favourable. Light red: unfavourable. Red: opposing. White: no explicit nor implicit standpoint on SSM.

An interesting finding is that – apart from the VVD – all political parties have maintained similar standpoints on this matter in their three election programs. The Christian conservative parties unsurprisingly maintained their opposing position on SSM, the CDA kept unfavourable standpoints for the advancement of SSM, and D66 and GroenLinks maintained their supporting and favourable positions respectively. A preliminary conclusion that can be drawn from these findings is that the assertion from the ACF that core beliefs are resistant to change over the course of a decade might therefore be correct in this case. The social democratic PvdA did liberalise its standpoint on SSM in 1998 when stating that "marriage will be open to homosexual relationships" (p. 78). Nevertheless, that was only *after* its previous standpoint from 1989 and 1994 supporting the RP law had been realised (p. 29; p. 10). Therefore, when it concerns the party's deep core and policy core beliefs, not much changed essentially. The exception to this finding was the conservative liberal VVD, which did not consider the theme of SSM *at all* until 1998 when they cautiously stated: "In the case of adoption, the interest of the child is decisive for liberals. The form of cohabitation in which the child grows up should be subordinate to that." (p. 24). This statement might have been purposefully ambiguous so as not to aggravate its supporters, which is unsurprising considering the fact that there was a lot of disagreement about SSM among the VVD's MPs.

Historically, the VVD has had two different wings – a conservative liberal branch and a social liberal branch – which have often been divided about more controversial or moral issues. The former wing focuses mainly on economic liberal ideas, whereas the latter attaches most prominence to the right of self-determination (Chavannes, 2017).

Unsurprisingly, the debate concerning SSM was therefore heated among the party members. In 1996, the majority of the House of Representatives agreed that the marriage ban was in violation with the Equal Treatment Act and the 'Kortmann Commission' was established to assess the legalisation of SSM during the first 'purple' coalition. Although a majority was thus reached, exactly half of VVD votes were against the motion, including the vote of the party leader Frits Bolkestein. A major reason for the conservative liberal wing to oppose SSM was the fear that it would harm the international position of the Netherlands (van den Dool, 2017). A few months later, although the VVD did not take in a shared position on the RP law for same-sex couples, all their MPs did vote in favour of the law in late 1996 (*Kamerstukken II, 23761, nr. 41*, 1996). Possibly, this might have been a compromise between the different wings within the party. In April 1998, the House of Representatives voted on a motion that an SSM bill should be made, and the VVD voted divided again although the seventeen supporting votes outnumbered the twelve opposing votes, indicating a shift in the benefit of the social liberal wing (van den Dool, 2017). In the new election program of 1998, SSM and the debates surrounding it could no longer be ignored. Nevertheless, the fact that the VVD did not include a standpoint in support of SSM in their election program in 1998 was a reflection of the disunity within the party. When the second term for the 'purple' coalition was agreed upon after the elections of 6 May 1998, the VVD leaders decided to agree with the majority of their party and officially announced the SSM bill in the coalition agreement (*Kamerstukken II, 26024, nr. 10*, 1998). There is no evidence that suggests that this was a major breaking point for the VVD as SSM was already agreed upon on 29 May, some three weeks after the elections (Trouw, 1998).

Y   Testing the hypothesis

H1:   *A new coalition of political parties in power (X1) has increased the political power of the advocacy coalition in support of same-sex marriage (X2), leading to the legalisation of same-sex marriage (Y).*

The above findings show that the political climate in the Netherland changed drastically during the relevant time period (X1), especially after the elections of 1994, and that the majority of the new governing coalition was in support of the legalisation of SSM (X2). Assuming that all MPs follow their official party line, the total number of supporting seats became increasingly favourable during this decade, as can be seen in Table 5.

Whereas the total number of supporting seats grew from 67 to 108, the opposing seats decreased from 60 to 37. More strikingly, the seats in full support of SSM increased by almost five times from 12 to 59.

Term	Supporting Seats		Opposing Seats	
	Supporting	Favourable	Opposing	Unfavourable
1989-1994	12	55	6	54
	67		60	
1994-1998	24	42	7	34
	66		41	
1998-2002	59	49	8	29
	108		37	

Table 5. Total number of Dutch seats supporting/opposing (the advancement of) SSM from 1989-2002; assuming that all MPs follow their official election programs.

As can be seen in Table 6, another favourable picture is seen when solely considering the seats in the governing coalition. Whereas the governing seats in explicit support of the legalisation of SSM were in a minority in the first two terms, the last term it had a clear majority without any seats in the opposition. Therefore, it is not an exaggeration to argue that the VVD did not have a very strong negotiation position concerning SSM as opposed to its coalition partners in 1998.

Term	Positions of Governing Seats				
	Supporting	Favourable	Opposing	Unfavourable	no standpoint
1989-1994		49		54	
1994-1998	24	37			31
1998-2002	59	38			

Table 6. Total number of Dutch governing seats supporting/opposing (the advancement of) SSM from 1989-2002; assuming that all MPs follow their official election programs.

An important finding from the analysis is that even though the total number of supporting seats "won" every time, SSM was not legalised until all governing seats were somewhat supportive of SSM, when 59 governing seats supported the legalisation and 38 governing seats were supportive of legislation related to SSM. The fact that the VVD changed its official position from neutral to supportive might have been the last push to SSM's legalisation. As can be seen in Table 7, the eventual bill on SSM in 2000 was passed with a large majority in the House of Representatives and the Senate.

	Votes in the House of Representatives		Votes in the Senate	
	12 September 2000		19 December 2000	
	For	*Against*	*For*	*Against*
CDA	3	24		20
PvdA	**41**	1	**15**	
VVD	**36**		**19**	
D66	**14**		**4**	
GroenLinks	10		8	
SGP		3		2
CU*		5		4
Total	109	33	49	26

Table 7. Votes on the Dutch SSM bill on 12 September 2000 in the House of Representatives and on 19 December 2000 in the Senate (*Kamerstukken II, 26672, nr. 100,* 2000; *Kamerstukken I, 26672, nr. 15*, 2000). (*In 2000, the Christian conservative parties RPF and GPV merged into the Christian democratic CU.)

Two important findings can be deduced from Table 7. Firstly, apart from one individual PvdA MP, and eight abstentions, the ACF's assertion that core beliefs are resistant to change seems to be correct in this case, as the eventual vote is almost identical to the official position of the parties (see Table 5, page 43). Secondly, and most importantly, consistent with the hypothesis and the ACF, the entire governing coalition voted in favour of SSM (*Kamerstukken II, 26672, nr. 100*, 2000*; Kamerstukken I, 26672, nr. 15*, 2000). As expected, all Christian parties voted against the bill. Based on the eventual vote, it has become clear that if the Christian parties would have been in the governing coalition, the bill would not have passed. Therefore, without the shift in the political landscape, which led to the 'purple' coalition, it is highly unlikely that SSM would have been legalised. The political power of the advocacy coalition in support of SSM could not have been stronger than by what it gained in the elections of 1994 and 1998. Even though the VVD was divided about SSM during this time, it did have a minority position during the coalition negotiations of 1998 with regards to the legalisation of SSM. The majority of the coalition therefore had the political power to convince the divided VVD to comply with their demands, emphasising the strength of the core mechanism of the ACF. Based on these findings, the hypothesis is supported by this case.

5.3   The DCF and same-sex marriage in the Netherlands

This section will test H2 in order to assess the strength of DCF. Before considering the independent variables X3 and X4 and testing the hypothesis, the different SSM discourses will be reflected upon below.

Identification of discourses

In her extensive research on SSU legislation in and around Europe, Kollman (2017) identified the two dominant discourses in the SSM debate: "The Dutch marriage debate largely focused on the equality argument of the marriage supporters and the counter-arguments by opponents about the traditional meaning of marriage and its purpose as a site of procreation." (p. 110). Moreover, in an earlier publication, Kollman (2014) argues that the proponents of SSM started using a "discourse about relationship recognition as a human right" in which they clearly distinguished between the difference between marriage and RP to bring true equality (Kollman, 2014, p. 105). Indeed, the campaign of the *Gay Krant* strengthened this equality and human rights discourse by the influence of its legal activists and their decision to bring cases to court that challenged the same-sex exclusion from marriage law (p. 114). In one of the first cases in 1990, the Court rejected the claim that denying SSM violated the equal treatment clause of the Dutch Constitution. This is why the Equal Treatment Act, which included the non-discrimination of homosexuals, was such an important step towards SSM. Moreover, Kollman (2014) claims that this equality and human rights discourse worked especially well in the Netherlands due to its "historic focus on the recognition of minorities, as well as the public's and political elites' pride in their international reputation for policy innovation." (p. 105). Furthermore, Kollman (2014) argues that this discourse was also powerful due to "the power that human rights enjoy in contemporary liberal democracies" (p. 117). By contrast, the opponents of SSM thus mainly used a discourse which emphasised the traditional meaning of marriage, and marriage as an 'institution of god'. Furthermore, this discourse also highlighted the possible negative international responses when changing marriage as an institution (Kollman, 2014, p. 118). In the remainder of this section's analysis, reference will be made to the traditional meaning of marriage (TMM) discourse, and the equality and human rights (E&HR) discourse.

To measure the involvement of the media in the SSM discourse, the five largest national newspapers in the Netherlands will be considered: *Algemeen Dagblad, NRC Handelsblad, de Telegraaf, Trouw,* and *de Volkskrant.* Their publications on SSM have been analysed from 1990 until the eventual vote of the Senate in December 2000. The articles have been codified into three categories: the equality and human rights (E&HR) discourse, the traditional meaning of marriage (TMM) discourse, and a neutral discourse.

The first discourse is identified when an article explicitly addresses the point of view that SSM improves equality or that it is a human right without referring to the opponents' discourse. For example, when the Volkskrant stated in 1990 that "marriage provides practical benefits and as long as that institute still exists, homosexuals must benefit from it", it used the E&HR discourse.

The second discourse is identified when the point of view of SSM opponents is explicitly addressed without referring to the supporters' point of view. To illustrate, when the NRC (1998) published an article with the title "Vatican denounces coalition for gay marriage" without referring to a more supportive point of view, it used the TMM discourse. The assumption here is that when an article solely uses the TMM discourse, it benefits opponents of SSM, and vice versa.

The third 'neutral discourse' category is included to represent impartial articles, which have been identified when an article merely considers factual information or when both the E&HR and TMM discourse are being discussed. A full overview of the newspaper articles is provided in Appendix C (page 89), and a summary of the findings is provided in Table 8.

The dominant discourse shifted mainly between an E&HR discourse (39,7 percent of the total amount of articles) and a neutral discourse (38,7 percent). The TMM discourse was generally much weaker, as only 21,6 percent of all articles favoured this discourse, and it was not the dominant discourse in any of the years. Nevertheless, as clearly visualised in Figure 6 (page 48), the TMM discourse did occupy an important position in 1996, when it became more dominant than the E&HR discourse. Possibly, this contributed to the decision to introduce an RP law before fully legalising SSM. Yet, in all other years, the E&HR and neutral discourse appeared more frequently each time.

Year	Total amount	Discourse					
		E&HR		TMM		Neutral	
1990	35	16	45,7%	4	11,4%	15	42,9%
1991	13	5	38,4%	3	23,1%	5	38,5%
1992	3	0	0%	1	33,3%	2	66,7%
1993	5	3	60%	1	20%	1	20%
1994	9	3	33,3%	2	22,2%	4	44,5%
1995	24	11	45,8%	3	12,5%	10	41,7%
1996	64	17	26,6%	22	34,4%	25	39%
1997	37	20	54,1%	4	10,8%	13	35,1%
1998	41	17	41,5%	10	24,4%	14	34,1%
1999	19	9	47,4%	3	15,8%	7	36,8%
2000	60	22	36,7%	14	23,3%	24	40%
	310	**123**	39,7%	**67**	21,6%	**120**	38,7%

Table 8. Overview of Dutch newspaper articles on SSM and discourse used from 1 January 1990 to 19 December 2000. Grey: dominant discourse per year.

In popular speech, the RP law was also referred to as "gay marriage" which can partly explain the peak in the number of SSM related articles in 1996, when the RP law was being debated in the House of Representatives. Other peaks occured in 1990, when the Supreme Court ruled on the exclusion of same-sex couples from Dutch marriage law, and in 2000, when SSM was eventually legalised. Before the legalisation, the number of articles diminished in 1999, when RP law had just been legalised and SSM was not yet being debated in the House of Representatives. A preliminary conclusion that can be made from this figure is that SSM was increasingly discussed in the media when it was an issue on the political agenda in the House of Representatives. Another finding is that none of the discourses have been particularly dominant in any of the years leading up to the legalisation of SSM. Although the topic was discussed relatively frequently, there is no specific – nor increasing – prevalance of the E&HR discourse that can lead to any definite conclusions about the positive influence of the media in the discourse.
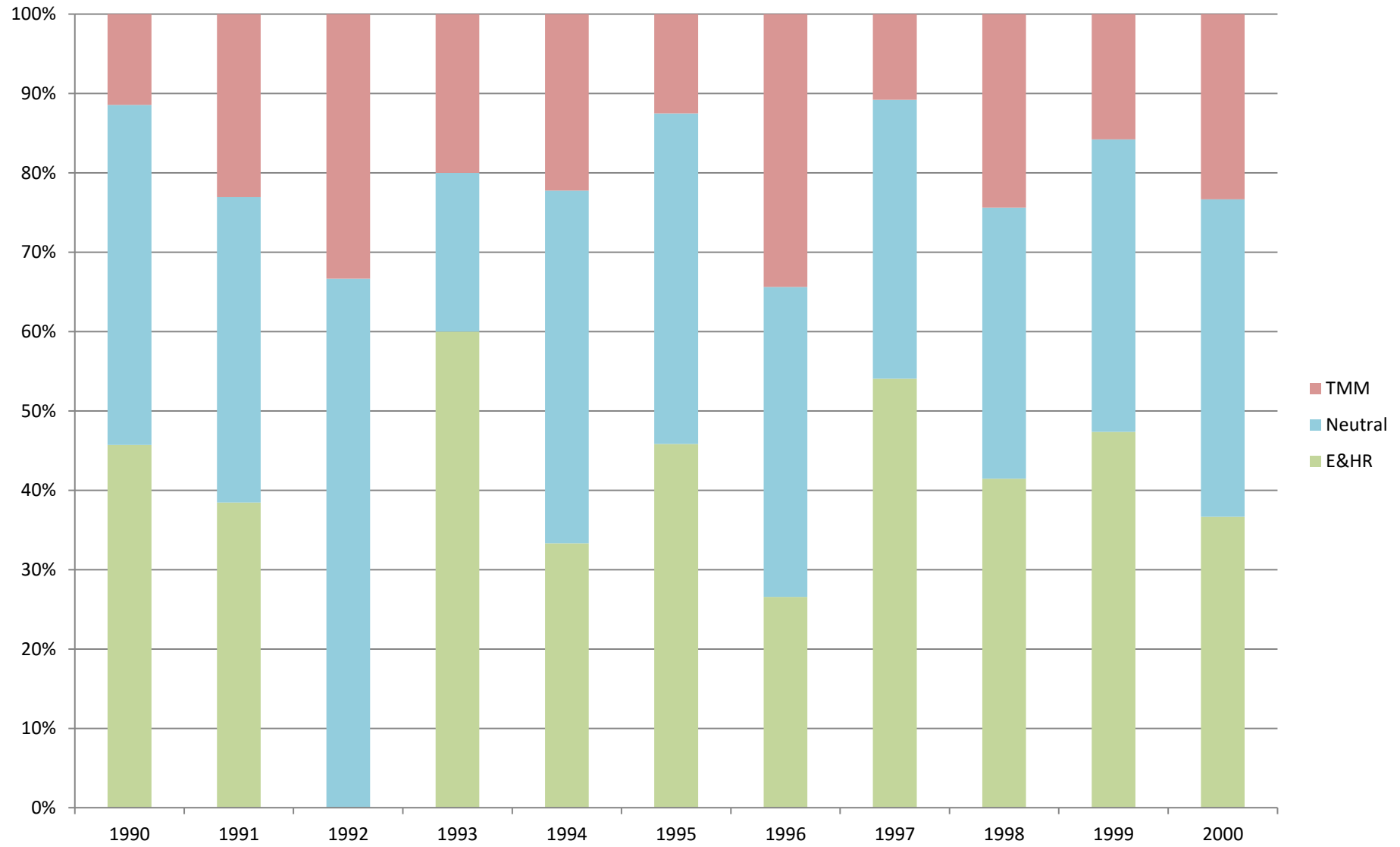
Figure 6. Dutch newspaper articles on SSM by discourse from 1990-2000 (in % of total).

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X4 SSM support in society

In order to measure whether discourse structuration has taken place – whether a specific discourse has become dominant in society – it is crucial to consider the support for SSM in Dutch society, and therefore public opinion polls have been considered. Not many public opinion polls were conducted in the years leading up to the legalisation of SSM, and no poll was conducted by the same authority. Therefore, the credibility of the levels of support below might be debated, especially since only three of such polls were conducted (see Table 9).

	1990	*1995*	*2000*
SSM support in Dutch society	53%	73%	62%

Table 9. Dutch public opinion polls on support of SSM (Trouw, 1990; Trouw; 1995; NRC Handelsblad, 2000).

The majority of Dutch society supported SSM in the decade leading up to its legalisation. Surprisingly, however, the support for SSM diminished from 73 percent in 1995 to 62 percent in 2000. An explanation for this decline is that 47 percent of respondents agreed to another statement in the same poll of 2000 that the legalisation of SSM was unnecessary because the RP law was already in place (NRC Handelsblad, 2000). Therefore, it is questionable whether the 73 percent of Dutch society truly supported SSM specifically in 1995 or merely supported the idea that same-sex couples had the right to some form of relationship recognition. Yet, it should not be neglected that the overall support for SSM *did* increase in the relevant time period.

Y Testing the hypothesis

H2: *The increasing involvement of the media (X3) has ensured that the discourse in support of SSM has gained widespread support in society (X4), leading to the legalisation of SSM (Y).*

The above findings show that the media got increasingly involved in the discourse on SSM (X3) and that the discourse in support of SSM has gained support in society (X4). However, although the media *did* get increasingly involved in the total amount of articles, there was no specific prevalence of the E&HR discourse over time. Moreover, although the public opinion polls prove that Dutch society was in support of SSM, this

support did not increase in a gradual manner. Although both the media and public opinion polls were supportive of SSM, the findings do not show a drastic increase in the degree of support over the relevant time period. Therefore, these findings do not explain the timing of the legalisation of SSM. In conclusion, there is not enough supporting evidence that the independent variables are strongly related to the dependent variable – the legalisation of SSM (Y) – in the Netherlands. Therefore, I find that the evidence is not strong enough, and that the hypothesis is therefore false.

Chapter 6. Analysis of same-sex marriage in Germany

This chapter will provide an in-depth analysis of the policy process towards the legalisation of SSM in Germany. Again, the context in which the SSM debate emerged as well as the events leading up to its legalisation in 2017 will be examined, after which H1 and H2 will be tested that address the ACF and DCF respectively. The eventual evaluation and discussion of the results of the Dutch and German cases will be provided in the upcoming chapter.

6.1   German context and events

At the time of writing this thesis, Germany was the latest country in the world to legalise SSM through a legislative act. Nevertheless, it is crucial to acknowledge that the German context in which the SSM debate emerged was very different from the Dutch context. First of all, whereas the Netherlands was the first to adopt full marriage equality, twenty-one countries already preceded Germany when it finally legalised SSM. Moreover, whereas the Netherlands enacted SSU reforms in a fast pace, it took Germany sixteen years from allowing RP in 2001 to legalising SSM in 2017 (Kollman, 2017, p. 101).

Whereas major transformations took place in many countries in Europe, Germany did not follow the same path. The sexual revolution that took place all over the western world mainly seemed to benefit heterosexuals in West Germany, and for a long time this revolution came from the mass media and business rather than from politics or social criticism (Eder, 2014, p. 106). Moreover, whereas the Netherlands established a strong LGBT rights movement right after the Second World War, in West Germany the circumstances for the establishment of such a strong movement were not particularly favourable due to the Allied occupation of the late 1940s and the following dominance of Christian democratic parties. Smaller gay and lesbian organisations were too fractured to engage in effective political lobbying and their leading figures did not form a united movement until 1986, when the Federal Association of Homosexuality (*Bundesverbands Homoseksualität;* BVH) was established. However, the BVH could not overcome the deep divisions that existed between radicals and reformers within the organisation, and it fell

apart shortly after its establishment due to disagreements about whether SSM should be their core goal. In such manner, a permanent LGBT rights organisation, the Lesbian and Gay Organisation of Germany (*Lesben- und Schwulenverband Deutschlands;* LSVD) was established only after the fall of the Berlin Wall in 1990 (Kollman, 2014, pp. 106-107).

However, in the absence of a strong LGBT rights organisation, the media still started speaking out against the discrimination of homosexuals in the mid-1960s and in 1969 the *total* ban on homosexuality - §175 of the German Criminal Code – had been partially lifted for those over 21 years old (Kollman, 2014, p. 110). Yet, the public largely remained disapproving of this 'liberalisation'. In 1973, the legal age for sexual activities among males was reduced to 18, even though the legal age remained 14 for lesbians and heterosexuals (p. 111). Surprisingly, it took another twenty years before homosexuality was fully decriminalised, when §175 of the German Criminal Code was finally abolished in 1994 (p. 115). Therefore, Germany did not have the same progressive stance on many issues as the Netherlands, as many morality policies were implemented much later (see Table 10). Oddly enough, although Germany and the Netherlands legalised abortion and prostitution around the same time, other morality policy issues were not addressed in Germany much longer, especially with regards to gay rights. Whereas the Netherlands fully decriminalised homosexuality in 1971, §175 of the German Criminal Code criminalised homosexuality for another twenty-three years. It is therefore unsurprising that it took longer for SSM to be legalised in the country.

	the Netherlands	(West) Germany
Abortion	1971, 1981	1974, 1976
Full decriminalisation of homosexual activity	1971	1994
Euthanasia	1985, 2002	
Prostitution	2000	2002
SSM	2001	2017

Table 10. Implementation of several morality policies in the Netherlands and Germany (Heerma van Voss, 2011; Eder, 2014).

In 2000, the Act on Registered Life Partnership was drafted by Volker Beck of the green party *Die Grüne* and passed the Bundestag (the House of Representatives) as a compromise between the Christian democratic union parties CDU/CSU and the proponents of SSM (*BT-Drucks. 14/3751,* 2000). Due to the difficulty of getting such a bill passed in the Bundesrat – representing the federal states – the RP bill contained very

few of the tax and welfare benefits that were attached to civil marriage. As expected, a second bill, which *did* contain many of these benefits, did not pass either chamber of government (Kollman, 2014, p. 111). Unsurprisingly, although not rigorous at all, the RP law only became possible *after* the centre-left Schröder government came to power in 1998, a coalition of the social democratic party and the Greens (Kollman, 2014, p. 111). For a long time, LGBT rights advocates were primarily concerned with improving the rights and benefits attached to RP law. Although these rights steadily increased, the first bill for the legalisation of SSM was not introduced by the Greens until 2009 at the end of the first Merkel government (*BT-Drucks., 16/13596*, 2009). The bill did not reach a vote until 2012, when it was defeated by a vote of 309 to 260 (Rheinische Post, 2012).

In June 2015, nine states of Germany submitted a bill to legalise SSM to the Bundesrat, which was approved in September (Der Spiegel, 2015). In the meanwhile, the Greens submitted another bill to legalise SSM (*BT-Drucks., 18/5098*, 2015). Yet, the consideration of all three initiatives was blocked by the governing parties CDU/CSU and SPD in the Bundestag. The SPD had originally been in favour of SSM, but agreed to drop its standpoint in the coalition agreement of 2013 (Bundesregierung, 2013). Nevertheless, in March 2017 the party announced that it would press the CDU/CSU to legalise SSM due to overwhelming public support in Germany (Deutsche Welle, 2017). With the elections in sight, the Green party pledged on the 17th of June that they would not participate in any governing coalition unless the legalisation of SSM would be part of the coalition agreement. Only a week later, the social democratic SPD and conservative liberal FDP followed (Berliner Zeitung, 2017). These events surely pressured the leading party CDU/CSU, and only three days later Merkel unexpectedly stated that she hoped the matter would be open to a "vote of conscience" in the near future (BBC, 2017). More quickly than expected, the Bundestag debated and voted on the matter only three days after Merkel's comments, and the bill was passed with a 393 to 226 vote. The Bundesrat – having already voiced its approval earlier – passed the bill without a vote, making SSM officially legal on the 1st of October 2017 (Deutscher Bundestag, 2017a).

6.2   The ACF and same-sex marriage in Germany

The following section will test H1 in order to assess the strength of the ACF. The governing coalitions in the decade leading up to the legalisation of SSM will first be considered from the period 2005 to 2017, after which the views of political parties – both in coalition and in opposition – will be examined. Lastly, the hypothesis will be tested.

X1   Governing coalition

From the period 2005 to 2017, the shifts that occurred in German politics were not major. The Christian democratic CDU/CSU remained the largest party over the entire decade, while their coalition partner shifted (see Table 11). Ever since the end of the second world war, the CDU/CSU and the social democratic SPD had been each others' main rivals in the elections. In the two terms preceding these coalitions, from 1998 to 2005, the CDU/CSU did not participate in the governing coalition, but a coalition of the SPD and the Greens under Schröder I and II took over after years of Christian democratic rule. Interestingly, that leaves us with the question of why these left Schröder governments did not attempt to legalise SSM, as would be the assumption of the ACF. Notwithstanding, in the relevant time period, the CDU/CSU clearly had the most political power. In the first term of 2005 and the last term of 2013, a coalition was agreed upon with the SPD. In 2009, the CDU/CSU agreed upon a coalition with the conservative liberal FDP, which remarkably lost all of its seats in the elections of 2013 as they failed to meet the 5% threshold.

Party	Political Ideology	Term		
		2005-2009	*2009-2013*	*2013-2017*
CDU/CSU	Christian democratic	226	239	311
SPD	Social democratic	222	146	192
FDP	Centre liberal	61	93	-
GRÜNE	Green	51	68	63
DIE LINKE	Left	54	76	64
Total		614	622	630

Table 11. German party seat distribution from 2005-2017. Grey: parties in governing coalition (Deutscher Bundestag, 2017b).

X2 SSM standpoints of political parties

For this part of the analysis, the official election programs of 2005, 2009 and 2013 of the five political parties have been analysed to examine their positions on (subjects related to) SSM. Repeatedly, not only explicit standpoints about SSM are considered, but also more implicit standpoints that are favourable or unfavourable to the advancement of SSM are examined. A full overview of all the original and translated standpoints is provided in Appendix D (page 97) and a summary of the findings is provided in Table 12.

Party	Political Ideology	Term		
		2005-2009	*2009-2013*	*2013-2017*
CDU/CSU	Christian democratic	226	239	311
SPD	Social democratic	222	146	192
FDP	Centre liberal	61	93	x
GRÜNE	Green	51	68	63
DIE LINKE	Left	54	76	64

Table 12. Development of German party positions on (the advancement of) SSM from 2005-2017; based on the official election programs (see Appendix D). Governing parties in underscored bold.

An interesting finding is that – again – all parties have maintained similar standpoints in the SSM debate during the three relevant terms of office. Here, the ACF's assertion that core beliefs are resistant to change seems to be correct again. The green party and the left party *Die Linke* both fully supported SSM throughout, and the FDP has steadily maintained its standpoints that RP "must be equated with marriage" (2009, p. 35). There are two minor exceptions. Firstly, the CDU/CSU solely stated in their 2005 election program that they "stand for special protection of marriage and the family" (p. 24). Although this implies that the party is not likely to be a proponent of SSM, they do not explicitly state their disapproval. However, this can arguably be explained by the fact that the first bill for SSM legalisation was not introduced until the beginning of 2009, since the CDU/CSU only included a standpoint on SSM *after* this bill was first introduced. In such manner, in their election program of 2009, the party explicitly included a standpoint opposing SSM when stating that they "refuse a complete legal equality of such [same-sex] partnerships with the marriage" (p. 29). However, in the following term of 2013, the CDU/CSU again made it more implicit by stating: "We are committed to the

constitutional requirements of the special promotion of marriage and family" (p. 38). However, this standpoint is not as implicit as it may seem, considering the fact that the 'special protection of marriage and the family' is a clause of Article 6 of the German Constitution, which became the most dominant counterargument against SSM by opponents who claimed that SSU's violated this clause. Three CDU/CSU-governed states even launched a constitutional complaint in 2000 at the Constitutional Court arguing that the RP law violated Article 6 (Kollman, 2014, p. 112). The second exception is the position of the SPD during this time. During the first two terms, the SPD's position was that the "existing disadvantages" of the RP law needed to be abolished (2009, p. 62), and the party only started to be explicit about its support for SSM in 2013 when stating that they wanted to "open the marriage for same-sex civil partnerships" (p. 50).

An interesting finding from this analysis is that the CDU/CSU was the only German party that evidently opposed SSM in the decade leading up to its legalisation. The other parties were all either in full support of SSM or took in positions favourable to the advancement of SSM. The fact that the CDU/CSU's position on SSM became a bit less explicit in 2013 might have been a consequence of the historical division between the German CDU and the Bavarian CSU. The latter has historically been much more conservative. Whereas the CDU conveys its traditional values, it has generally been more moderate in the benefits and rights that should be allowed within RP law. Merkel herself has been quite cautious about the SSM theme, for example by commenting "that she was unsure of the consequences for the children within gay marriages" (Deutsche Welle, 2017). Contrarily, until as late as April 2017, the CSU wanted to make 'traditional families' the central theme of the election program of the subsequent elections of 2017 (Deutsche Welle, 2017). Nevertheless, although the division might explain the more moderate stance of the CDU branch, it does not explain why the CDU/CSU actively opposed the legalisation of SSM for a long time.

Y Testing the hypothesis

H1:   *A new coalition of political parties in power (X1) has increased the political power of the advocacy coalition in support of same-sex marriage (X2), leading to the legalisation of same-sex marriage (Y).*

The above findings show that the political climate in Germany did not change drastically (X1) as the CDU/CSU remained the largest parties in all relevant elections, and that the new governing coalition did not have a majority in supporting SSM (X2). Nevertheless, assuming that all members of parliament (MPs) follow the official election program, the supporting parties would have 'won' every single time (see Table 13). However, due to the fact that the CDU/CSU attained more seats each election, the total number of supporting versus opposing seats became less favourable every time.

Period	Supporting Seats		Opposing Seats	
	Supporting	Favourable	Opposing	Unfavourable
2005-2009	105	283	x	226
	388		226	
2009-2013	144	239	239	x
	383		239	
2013-2017	319	x	x	311
	319		311	

Table 13. Total number of German seats supporting/opposing (the advancement of) SSM from 2005-2017; assuming that all MPs follow their official election programs.

However, as can be seen in Table 14 (below), when solely considering the seats of the governing coalitions and their positions on SSM, the contrary is visible. Those supporting SSM within the coalition would have 'lost' every single time, even though the ideological gap between the opposing (from explicit to implicit standpoint) and supporting (from implicit to explicit standpoint) governing seats diminished in 2013. Nevertheless, when considering the table below, it does seem that the political power of the CDU/CSU forced the FDP in 2009 and the SPD in 2013 to comply to the largest party's request to abandon their position on SSM, as in both coalition agreements SSM is not mentioned at all (Bundesregierung, 2009; Bundesregierung, 2013). The contrary happened in the Dutch case, when the political power of the PvdA and D66 forced the VVD to agree with the legalisation of SSM.

Period	Governing seats' standpoints			
	Supporting	Favourable	Opposing	Unfavourable
2005-2009		222		226
2009-2013		93	239	
2013-2017	192			311

Table 14. Total number of German governing seats supporting/opposing (the advancement of) SSM from 2005-2017; assuming that all MPs follow their official election programs.

As mentioned in the research design: "if the new governing coalition does *not* have supportive preferences and values, the hypothesis is automatically false". Indeed, if the SPD would have adhered to the coalition agreement of 2013, SSM would not have been legalised during the third Merkel government. Unsurprisingly, the CDU/CSU did not appreciate the SPD's sudden push for reform (Bleiker, 2017). Moreover, as all major opposition parties vowed that they would not cooperate in any coalition unless SSM was part of the agreement, the CDU/CSU did not have many alternatives left as they would ultimately be forced to comply with these demands.

With the elections in sight, the CDU/CSU made a smart move by letting 'Merkel' open the SSM bill to a "vote of conscience" before they were *forced* to do so. In such manner, while the majority of the party – including Merkel – still voted against the bill and after almost a decade of successfully blocking SSM, the CDU/CSU still received recognition for legalising SSM (see Table 15). Yet, seventy-five CDU/CSU MPs voted in favour of the legalisation, and nine were absent or abstained, indicating that the party was indeed divided about the matter.

Party	Votes in the Bundestag			
	For	*Against*	*Abstention*	*Absent*
CDU/CSU	**75**	**225**	4	5
SPD	**192**			1
GRÜNE	63			
DIE LINKE	63			1
Total	393	226		

Table 15. 30 June 2017 vote in Bundestag on the SSM bill (Deutscher Bundestag, 2017a).

In conclusion, the ACF might explain why the legalisation of SSM was postponed for such a long time in Germany, because the political power of the CDU/CSU was so strong that they managed to keep SSM from being legalised. The party's strong political power and fierce resistance against the legalisation helped them to secure SSM from being incorporated in all of the coalition agreements. Notwithstanding, the ACF is essentially unsuccessful in explaining why the CDU/CSU eventually failed to stop the legalisation of SSM (Y) and the hypothesis is therefore false.

6.3   The DCF and same-sex marriage in Germany

This section will test H2 in order to test the explanatory strength of the DCF on the German policy process towards the legalisation of SSM. Before considering the independent variables and testing the hypothesis, the different SSM discourses will be identified below.

Identification of discourses

Similar to the Dutch case, the German discourse in support of SSM also sought to convince elites and the public that relationship recognition is a human right. However, according to Kollman (2014), the nature and development of this discourse differed in a few ways (p. 119). Firstly, the German LGBT activists linked the need to combat LGBT discrimination to the country's historic mistreatment of homosexuals, in particular during the Nazi dictatorship, which proved to be a powerful argument for emphasising the importance of same-sex relationships as a human right in this specific German context (p. 120) Secondly, another difference is that "SSU activists had greater difficulty than their Dutch counterparts linking rights-based arguments explicitly to a need to reform the traditional family policy paradigm" (p. 120). The constitutional guarantee of the 'special protection of marriage and family' ensured that many LGBT activists became anxious to talk about fundamental family policy reform out of fear that the clause would be used against them (p. 120). Therefore, whereas the Dutch discourse clearly distinguished between RP law and SSM, the German discourse failed to do so. In such manner, the supporting side had even made it quite difficult for themselves as "many SSU supporters throughout 1999 and 2000 argued that the draft RP law was constitutional exactly *because* it did not allow same-sex couples to marry" (Kollman, 2014, p. 120). While this helped the SSU supporters to promote the RP law at that time, it did not help their eventual demand for SSM. Considering the fact that the first LGBT organisation fell apart due to disagreement about the desirability of SSM as the main objective and the more general underdevelopment of the LGBT movement, the proponents' discourse was less clearly in support of SSM but more generally concerned with relationship recognition for a long time (p. 107; p. 109).

The opponents of SSM accordingly mainly used a discourse which emphasised the constitutional guarantee of the 'special protection of marriage and the family', which

was a powerful argument *against* SSM for a long time (Kollman, 2014, p. 120). The proponents of SSM used a human rights discourse, but did not focus too much on the (Dutch) equality argument as it took a while before full marriage equality became their main goal. In the remainder of this section's analysis, reference will therefore be made to the 'special protection of marriage and the family' (SPMF) discourse and the human rights (HR) discourse.

X3   Involvement of media in supportive discourse

To measure the involvement of the media in the discourse, three big national newspapers have been included in the analysis: *der Tagesspiegel, die Tageszeitung,* and *die Welt.* Although the Dutch newspaper analysis used two more newspapers, the total number of articles is significantly higher (537 instead of 310). Moreover, these newspapers have deliberately been chosen based on the fact that they are from different political alignments: liberal, left-wing, and conservative respectively. Their publications on SSM have been analysed from 2007 until the eventual vote in the Bundestag on 30 June 2017, and have been codified into three different categories, the HR discourse, the SPMF discourse, and – again – a neutral discourse. The analysis has taken place in a similar fashion as the Dutch case. A full overview of the newspaper articles is provided in Appendix E (page 102), and a summary of the findings is provided in Table 16 (below).

Year	Total amount	Discourse					
		HR		SPMF		Neutral	
2007	14	3	21,4%	3	21,4%	8	57,2%
2008	22	9	40,9%	1	4,5%	12	54,6%
2009	37	21	56,8%	2	5,4%	14	37,8%
2010	27	11	40,7%	4	14,8%	12	44,5%
2011	29	18	62,1%	3	10,3%	8	27,6%
2012	63	32	50,8%	6	9,5%	25	39,7%
2013	143	87	60,8%	10	7,0%	46	32,2%
2014	20	15	75%	0	0%	5	25%
2015	114	67	58,8%	4	3,5%	43	37,7%
2016	36	27	75%	3	8,3%	6	16,7%
2017	32	25	78,1%	0	0%	7	21,9%
	537	**315**	58,7%	**36**	6,7%	**186**	34,6%

Table 16. Overview of German newspaper articles on SSM and discourse used from 1 January 2007 to 30 June 2017. Grey: dominant discourse per year.

It is clearly visible that the HR discourse was the dominant discourse in the German debate on SSM, as 58,7 percent of all articles used this discourse, while only 6,7 percent of all articles used the SPMF discourse and 34,6 percent used a neutral discourse. This is a major difference as opposed to the Dutch newspaper analysis, and implies that the German debate was much more supportive of SSM. However, the German debate has not been supportive at all times, as is clearly visualised in Figure 7 (page 63). The HR discourse gradually grew – with some ups and downs – from only 21,4 percent of all articles in 2007 to 78 percent in 2017. Moreover, although the SPMF discourse has not been very prominent in the German discourse during the *entire* decade, the use of the discourse clearly declined. In 2017 – the year of legalisation – no article was written in the SPMF discourse. In conclusion, the dominant discourse used in the German media clearly increased in favour of the proponents of SSM in the relevant time span.

X4   SSM support in society

In order to measure whether the HR discourse has become dominant in society – in other words, whether discourse structuration has taken place – this section will consider the support for SSM in German society. As can be seen in Table 17, the German public opinion became increasingly supportive of SSM over the years. Within eleven years, the support rates for SSM increased from 52 percent in 2006 to 83 percent in 2017. In such manner, the public support for SSM grew much faster than in Dutch society from 1990 (53 percent) to 2000 (62 percent). Especially in the last two years before the legalisation of SSM, the support for SSM grew tremendously, as eventually 83 percent of German society claimed they supported the legalisation of SSM.

	2006	*2013*	*2015*	*2017*
SSM support	52%	67%	70%	83%

Table 17. German public opinion polls on support of SSM (Angus Reid, 2006; Ipsos, 2013; European Commission, 2017; Küpper, Klocke & Hoffman, 2017).

Y   Testing the Hypothesis

H2:   *The increasing involvement of the media (X3) has ensured that the discourse in support of SSM has gained widespread support in society (X4), leading to the legalisation of SSM (Y).*

The above findings show that the media got increasingly involved in the supporting discourse on SSM (X3), that the discourse gained widespread support in German society (X4), and that SSM has been legalised (Y). The discourse analysis has shown that the use of the supporting HR discourse increased gradually in German newspapers, which has most likely contributed to a changing understanding of SSM in German society. Moreover, the findings of this analysis show a very clear and strong increase in the support for SSM in German society. Although one cannot be entirely sure that the independent variables have caused the dependent variable, the use of the HR discourse (from 21 percent to 78 percent) and support of the HR discourse (from 21 percent to 78%) have increased in a similar fashion and seem to be connected. Although questions might refer to the extent to which this analysis provides an explanation for the *timing* of reform, the DCF and this specific hypothesis does not ask for this explanation. Therefore, based on these findings, it can be affirmed that 'discourse structuration' has taken place, which has been reflected in German politics through 'discourse institutionalisation' by the legalisation of SSM. Therefore, I find that the evidence is strong enough to assert that H2 is supported in the German case.
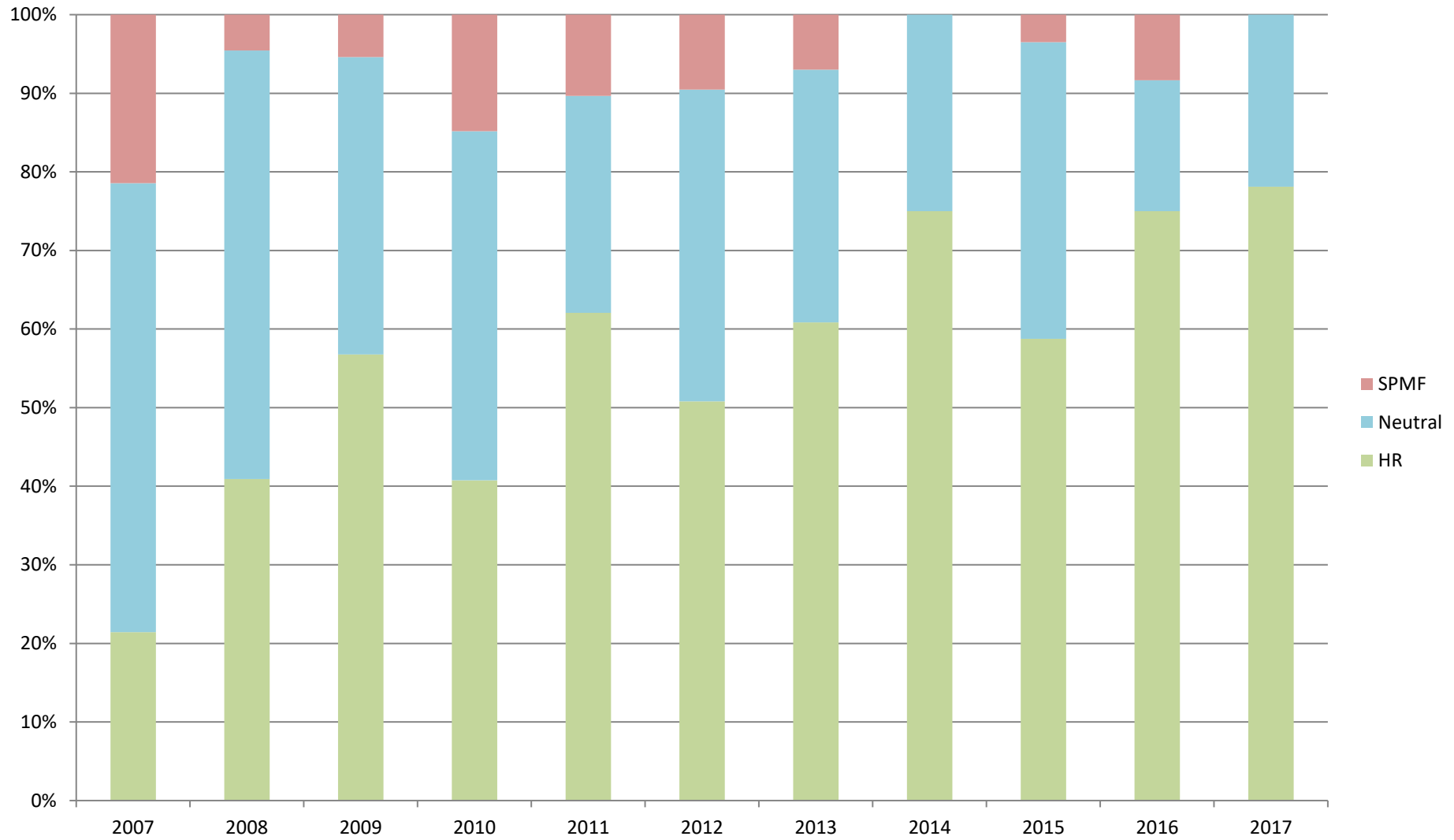
Figure 7. German newspaper articles on SSM by discourse from 2007-2017 (in % of total)

Chapter 7. The power of politics or the power of discourse?

This chapter is the final step of the congruence data analysis (see Figure 8). The data collection and comparison with the ACF and DCF and the two cases has been completed in the previous two chapters. In this chapter the findings of the analysis will be combined and discussed in order to evaluate the relative strength or weakness of the ACF and the DCF.

1. Data collection (Chapter 5 & 6)
2. Compare data with the Advocacy Coalition Framework and two cases (Chapter 5.2 & 6.2)
3. Compare data with the Discourse Coalition Framework and two cases (Chapter 5.3 & 6.3)
4. Combine results and evaluate relative strength/weakness of the ACF and DCF (Chapter 7)
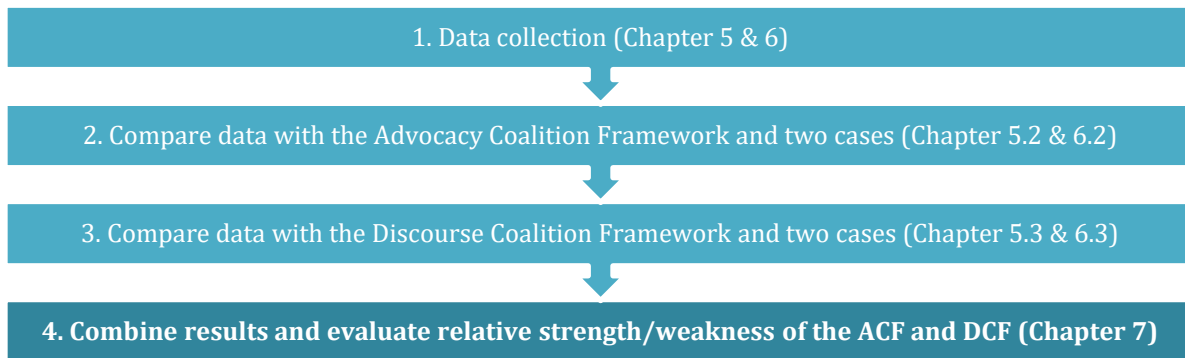
Figure 8. Final step in the congruence analysis used in this thesis.

7.1   The Advocacy Coalition Framework

The analysis of the policy process towards SSM in the Netherlands and Germany has not provided clear-cut conclusions with regards to the explanatory power of the ACF. While H1 – formulated to assess the strength of the theory – is supported by the Dutch case, it is rejected by the German case. The key explanatory mechanism of the framework – political power – accurately seemed to explain why the Dutch policy process eventually favoured the legalisation of SSM. The political power of the new so-called purple coalition could not have been stronger than by what it gained in the elections of 1994 and 1998. Furthermore, their shared position on SSM became especially supportive in 1998 when the conservative liberal VVD took in a favourable position on SSM. In the eventual vote in 2000, as would be expected by the ACF, the entire governing coalition voted in favour of the SSM bill. Although the VVD was divided about SSM for a long time, it took in a minority position in the coalition negotiations of 1998, which most likely forced them to comply with the policy change. Therefore, without the political power of the governing parties, it is highly unlikely that SSM would have been legalised at that

time. Political power has therefore been proven to be a strong mechanism with regards to this specific policy process.

Nevertheless, by contrast, the political power in the German case laid primarily with the only party in opposition of SSM: the CDU/CSU. From the outset, this sole observation is particularly problematic with regards to the ACF, as it is unlikely that the Christian democratic union parties changed their deep core and policy core beliefs. Moreover, the fact that SSM has been legalised despite the CDU/CSU's access to the key resource of 'formal legal authority to make policy decisions' is problematic with regards to the theory. Therefore, while the ACF might explain why the party managed to prevent the legalisation of SSM for such a long time in Germany, the theory does not have the ability to explain why the CDU/CSU eventually failed to prevent the policy change that took place in 2017. Moreover, the ACF also fails to explain why the previous left coalitions from 1998 to 2005 did not initiate reform even though they had the core beliefs and political power to do so.

7.2   The Discourse Coalition Framework

Similar to the ACF, the analysis of the policy process towards SSM in the Netherlands and Germany has not provided any definite conclusions on the explanatory strength of the DCF. Contrary to the ACF, the Dutch case rejected H2, while the German case supported it. The key explanatory mechanism – discursive power – essentially failed to explain why SSM was legalised in the Netherlands. Although the involvement of the media in the E&HR discourse and the public opinion figures were favourable in the decade leading up to the legalisation, the findings do not suggest that these factors became *increasingly* favourable. Since there was no specific increase in the involvement of the media in the supportive discourse and in public support, there is no evidence that the mechanisms of discourse structuration and discourse institutionalisation occurred. Therefore, the DCF fails to explain the legalisation of SSM in the Netherlands.

By contrast, discursive power has been supported as shaping the policy process towards SSM in Germany. Not only did the HR discourse become increasingly dominant in the German media, the support for SSM in society could not have been more favourable than

the support of 83 percent of the German population in 2017 as opposed to 52 percent in 2006. Therefore, this combination of favourable determinants indicates that the power of discourse likely had an influence on the mechanisms of discourse structuration and institutionalisation to occur through which SSM was legalised.

7.3   Combining & evaluating the results

The aim of the analysis was to determine which theory – the ACF or the DCF – best explains the legalisation of SSM. As confirmed in Table 18, the analysis has shown conflicting results, and has not led to the conclusion that one theory has more explanatory power than the other. The aim of this subchapter is to reflect on these findings, evaluate them and provide explanations for these results.

	H1: the ACF	H2: the DCF
Case 1: SSM in the Netherlands	Supported	Rejected
Case 2: SSM in Germany	Rejected	Supported

Table 18. Combining the results

The fact that the analysis has shown conflicting results even though the cases have been carefully selected as 'most-likely cases' was unexpected. As mentioned in the research design, Blatter and Haverland (2014) claim that when a theory is still challenged even under the most favourable circumstances, meaningful conclusions can be made about that theory's weakness (p. 177). Therefore, based on these findings, these two classical theories – which have similarly been carefully selected based on their expected ability to explain these policy changes – are too weak to account for morality policy change. Neither core mechanism – discursive power or political power – accurately explain why SSM was legalised in the Netherlands *and* Germany.

The ACF only allows the researcher to understand how the political power of certain parties influenced the policy process towards SSM, but fails to give some deeper explanation of how the issue emerged on the political agenda and how value conflicts shaped these issues. Whereas the ACF has been developed in such a manner that it is universally applicable and covers a wide variety of social contexts, the DCF has been developed with the aim to understand the historical and social contexts in which policies

change. To illustrate, the DCF's mechanism of discursive power could provide an explanation of why political actors of conservative governments could hypothetically be convinced of liberal ideas. Therefore, it was expected from the outset that the DCF would provide more explanatory power with regards to morality issues due to its sole foundation that political problems are socially constructed, and its aim to explain the historical and social context in which social constructs emerge. Yet, the DCF failed to explain the historical elements of the two different cases in terms of their timing and the social context in which SSM emerged. Whereas the Netherlands already had a strong LGBT rights movement and decriminalised homosexuality at an early stage, these reforms on morality issues related to LGBT rights occurred much later in Germany. In such manner, the Netherlands engaged in "policy invention" while Germany engaged in "policy diffusion" as the legalisation of SSM was spreading across borders (Kollman, 2017, p. 100). The latter observation would also explain why the public support for SSM grew much slower in the Netherlands (from 53 percent in 1990 to 62 percent in 2000) than in Germany (from 52 percent in 2006 to 83 percent in 2017). Nevertheless, these are small alternative explanations that are not addressed as such in the classical theories as the variation in the *timing* of permissiveness could not be explained by either the ACF or the DCF.

Chapter 8. Conclusions

This chapter will reflect on the entire thesis and give an overall conclusion with regard to the research question. Furthermore, the limitations of this thesis will be discussed and recommendations for future research will be made.

8.1   Concluding remarks

This thesis unfortunately has not been able to produce a definite conclusion to the central research question:

> *Which classical theory of the policy process – the Advocacy Coalition Framework or the Discourse Coalition Framework – best explains the legalisation of same-sex marriage in the Netherlands and Germany?*

As examined in the previous chapter, neither theory proved to be strong enough to explain *both* cases, even though these were carefully selected as 'most-likely cases'. Considering the fact that both theories were still challenged even in the most favourable conditions, the classical theories do not prove to be strong enough to account for morality policies. Although this thesis has therefore not contributed to the "struggle between scientific paradigms" as stated to be its expected theoretical relevance, a non-conclusion is still a powerful conclusion with regards to the research matter. Particularly, the findings suggest that morality policies *are* significantly different from other fields of regulation, and that these classical theories therefore do not provide the same capacity and explanatory leverage for morality policies as for other policy fields. The assertion that morality policies are typically shaped by societal value conflicts rather than more instrumental considerations, as discussed in the first few chapters, seems to limit the explanatory power of the classical theories.

Moreover, as explained in the literature review, there is an abundance of individual explanations for the degree of permissiveness towards morality policies, and SSM specifically. The most dominant factors that scholars have found to explain variation were the role of religion, societal value conflicts, party cleavages, the role of the judiciary and international influences. Although the ACF addresses party cleavages and the DCF

somewhat addresses societal value conflicts, both theories do not account for the important influence of religion, the role of the judiciary and international influences. Therefore, the main conclusion that can be made is that morality policy change *is* significantly different from standard fields of regulation. The existing frameworks cannot consistently explain *morality* policy change, and therefore it should be accurately addressed as something different by the creation of a new framework of policy change that is applicable to a wide variety of morality policies.

8.2   Alternative explanations

The thesis has pointed to a few alternative explanations – not addressed by the frameworks – that possibly explain the legalisation of SSM in the Netherlands and Germany. There are a few important *events* that need to be taken into consideration. In the Netherlands, the adoption of the Equal Treatment Act in 1994 turned out to be an important step towards the acceptance of SSM. Moreover, the establishment of the independent 'Kortmann commission' to assess the possibility of opening up marriage was crucial as well, because if the panel did *not* advise in favour of SSM, it would have been difficult for the proponents to attain support at the time. Such an important event did not take place in Germany until the opposition parties announced that they would not cooperate with the CDU/CSU until they would agree to SSM in 2017.

Furthermore, there are a few important *domestic historical factors* that need to be taken into consideration. The Allied occupation, the division of Germany and the following dominance of Christian democratic parties contributed to the fact that LGBT rights were neglected much longer in Germany as homosexual activity was not fully decriminalised until as late as 1994. Contrarily, the Netherlands was viewed by many as a 'guiding country' with regards to implementing liberal policies concerning morality issues. These developments also contributed to the fact that the Netherlands had an established LGBT rights movement at an early stage, whereas Germany did not attain a stable national movement until after the fall of the Berlin Wall. Furthermore, the German constitutional guarantee of the 'special protection of marriage and the family' ascertained that many proponents of SSM became anxious to advocate fundamental policy change, whereas the abovementioned events made sure that Dutch society had become increasingly tolerant.

These important historical developments are clearly neglected in the ACF and DCF, while such historical factors seem to be crucial for change in morality policies that are so deeply embedded in societal value conflicts.

8.3 Limitations and recommendations for future research

There have been a few limitations to this research, most of which have been discussed in the research design and are related to the hypotheses and the operationalisation and measurement of variables (see pages 34-35). In sum, the research could be accused of not *fully* capturing the ACF and DCF in the hypotheses. Nevertheless, a great effort has been made to address the most fundamental aspects of these theories. Moreover, for the independent variable X3, *more* newspapers and a *wider* variety of media outlets could have been examined, but this was unfortunately beyond the scope of this research. More specifically, the research would have been more valid if interviews would have been conducted with people involved in the SSM policy process in the Netherlands and Germany. More generally, more definite conclusions could have been made with regards to the issues addressed in this thesis if *more* cases would have been used. However, although these would have been a great addition to this thesis and the academic field, it was neither within the scope and time of a master thesis and the decision *has* been made to use two case studies instead of one.

The future research agenda with regards to the issues addressed in this thesis can be divided into two areas: a *case-specific* research agenda; and a *theoretical* research agenda. The case-specific research agenda refers specifically to the Dutch and German policy processes towards SSM. Some questions that remain with regards to the ACF hypothesis refer to why the VVD and CDU/CSU decided to change course and 'allow' SSM to be legalised and voted in favour of its legalisation. It would therefore be a great addition to future analyses to interview retired MEPs to understand their change of course. Moreover, other questions with regards to the DCF hypothesis refer to whether other media outlets, such as television or social media in the German case, have contributed to an increasing involvement of the media in the supportive SSM discourse. More extensive research could therefore be conducted with reference to these other media outlets in the future.

The theoretical research agenda refers more generally to the ability of public policy theories to account for morality policies. First of all, more research needs to be done to assess the explanatory strength of the ACF and DCF on morality policies by examining *more* countries where SSM was legalised, or *more* cases of different morality policy subfields, such as the legalisation of abortion or euthanasia. Secondly, and most importantly, future research should devote attention to either the adaptation of existing public policy theories to account for morality policies, or the creation of a completely new framework developed specifically for morality policy change. Only then can public policy scholars truly understand how and why change with regards to moral issues *can* sometimes take place.

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Appendix

Appendix A

Inglehart-Welzel Cultural Map 2010-2014 (World Values Survey, 2018).
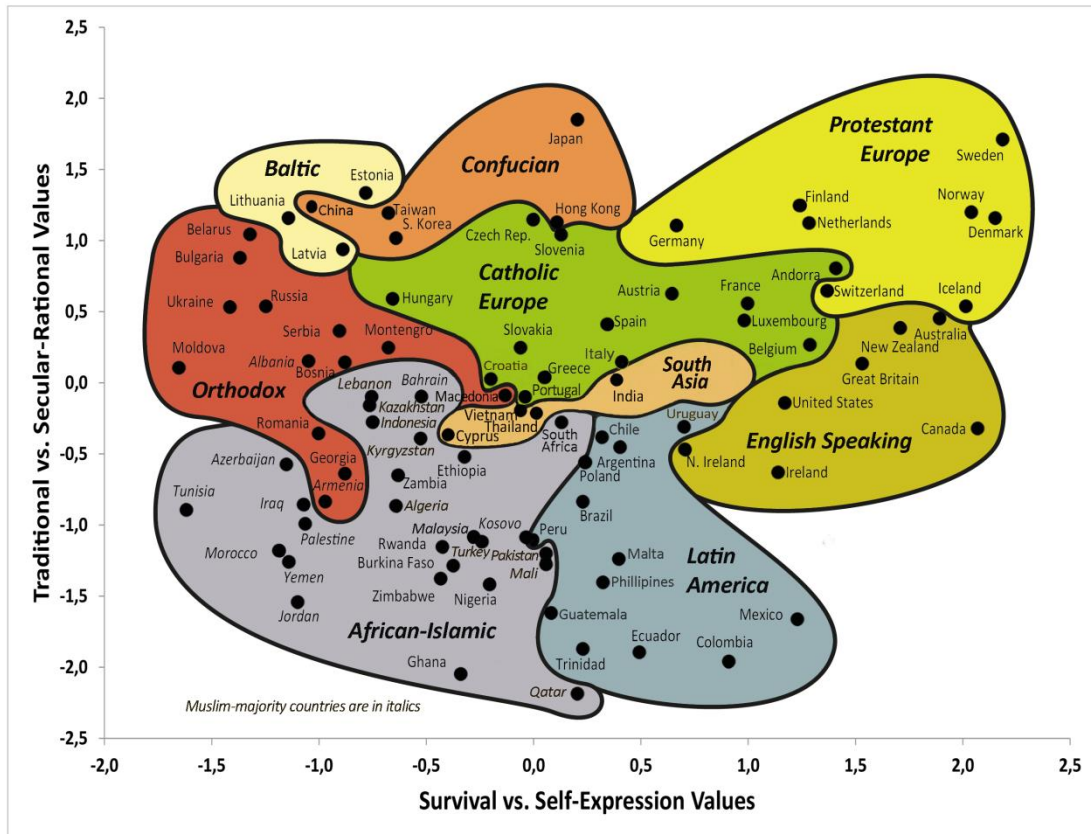
Appendix B

Dutch political parties and SSM or related positions between 1989 and 2002. Grey: in subsequent governing coalition. Green: supporting.

Light green: favourable. Red: opposing. Light red: unfavourable. White: no explicit nor implicit standpoint regarding SSM.

Party	Term	Seats	SSM or related standpoint	
			Original	*Translated*
CDA	1989-1994	54	"Het CDA hecht bijzondere waarde aan huwelijk en gezin en aan die duurzame samenlevingsverbanden waarin beide partners de verantwoordelijkheid voor elkaar aanvaarden." (CDA, 1989, p. 63)	"The CDA attaches extraordinary value to marriage and the family and to sustainable relationships in which both partners accept responsibility for one another."
	1994-1998	34	"Samenlevingsvormen, waarin twee mensen, ook van gelijk geslacht of naaste bloedverwanten, duurzaam de verantwoordelijkheid van elkaar aanvaarden, hebben aanspraak op met het huwelijk vergelijkbare rechten en plichten. Dit wordt wettelijk geregeld met inbegrip van de mogelijkheden van registratie van deze verbanden bij gemeentelijke overheid. [...] De rechtspositie van partners in geregistreerde samenlevingsvormen is gelijk aan die van gehuwden." (CDA, 1994, p. 26)	"Forms of cohabitation in which two peoples, also of the same sex or close relatives, permanently accept responsibility of each other, are entitled the rights and obligations that are comparable to marriage. This is regulated by law, including the possibilities of registering these links with the municipial government. [...]. The legal position of partners in registered forms of cohabitation is equal to that of married couples."
			"Bij de adoptiewetgeving blijft als uitgangspunt gehandhaafd dat er een juridische vader en een juridische moeder zijn, omdat de mogelijkheden die adoptie biedt, gericht zijn op vervanging van de afstammingsrelatie." (CDA, 1994, p. 26)	"The basic principle of adoption legislation is that there is a legal father and a legal mother, because the possibilities offered by adoption are aimed at replacing the parentage relationship."
	1998-2002	29	"Uitgangspunt bij adoptiewetgeving blijft dat er een juridische vader en een juridische moeder zijn. Uitsluitend als het in het belang van het kind is en als de biologische ouder daarmee instemt, wordt voor niet huwelijkse samenlevingsvormen een partnervoogdijschap mogelijk gemaakt." (CDA, 1998, p.	"The foundation of adoption legislation is that there is a legal father and a legal mother. Only if it is in the best interest of the child and if the biological parent agrees, a partner supervision is made possible for non-marital forms of cohabitation."

			17)	
PvdA	1989-1994	49	"Lesbische vrouwen en homoseksuele mannen ondervinden in hun relaties discriminatie, met name vanwege de regelgeving op het gebied van ouderschap, alimentatie, pensioenvoorzieningen en erfrecht. In het kader van gelijke behandeling wordt de mogelijkheid van een "geregistreerd partnerschap" ingevoerd". (PvdA, 1989, p. 29)	"Lesbian women and homosexual men face discrimination in their relationships, particularly because of the regulations in the field of parenting, alimony, pension provisions and inheritance law. In the context of equal treatment, the possibility of a "registered partnership" is introduced."
	1994-1998	37	"Voorts zit er stijging in de goedkeuring van alternatieve samenlevingsvormen, in de voorkeur voor gelijkheid in de seksuele rolverdeling, in de appreciatie van niet-autoritaire opvoeding, in de tolerantie richting homoseksuelen, in de waardering van democratische vrijheden, in de religieuze tolerantie en in de afkeer van discriminatie." (PvdA, 1994, p. 10)	"There is an improvement in the acceptance of alternative forms of cohabitation, in the preference for equality in the sexual division of roles, in the appreciation of non-authoritarian upbringings, in the tolerance towards homosexuals, in the religious tolerance and the aversion of discrimination."
	1998-2002	45	"Het huwelijk wordt opengesteld voor homoseksuele relaties. Adoptie van kinderen door homoseksuele paren wordt mogelijk gemaakt. De bestaande mogelijkheden voor partnerregistratie blijven daarnaast in tact." (PvdA, 1998, p. 78)	"Marriage will be open to homosexual relationships. Adoption of children by homosexual couples is made possible. The existing possibilities for partner registration also remain intact."
VVD	1989-1994	22	*No explicit nor implicit standpoint*	
	1994-1998	31	*No explicit nor implicit standpoint*	
	1998-2002	38	"Bij adoptie is het belang van het kind voor liberalen doorslaggevend. De samenlevingsvorm waarin het kind opgroeit behoort daaraan ondergeschikt te zijn." (VVD, 1998, p. 24)	"In the case of adoption, the interest of the child is decisive for liberals. The form of cohabitation in which the child grows up should be subordinate to that."
D66	1989-1994	12	"D66 ziet het burgerlijk huwelijk onder meer als een wijze waarop individuen vorm kunnen geven aan de vermogensrechtelijke, fiscale of erfrechtelijke conse-quenties van hun relatie. Er is geen reden om deze mogelijkheden van een huwelijk te beperken tot	"D66 sees the civil marriage as a way in which individuals can give shape to the legal consequences of their relationship. There is no reason to limit these possibilities of marriage to heterosexual relationships."

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			heterosexuele relaties." (D66, 1989, p. 68)	
	1994-1998	24	"de totstandkoming van een vorm van geregistreerd partnerschap voor homoseksuelen [moet prioriteit hebben]." (D66, 1994, p. 60)	"the establishment of a form of registered partnership for homosexuals [must be a priority]."
	1998-2002	14	"Het burgerlijk huwelijk dient opengesteld te worden voor mensen van gelijk geslacht." (D66, 1998, p. 70)	"The civil marriage needs to be open to people of the same sex"
Groen Links	1989-1994	6	"Discriminatie of grond van ras, huidskleur, levensbeschouwelijke overtuiging, sekse, seksuele voorkeur, leeftijd of op welke grond dan ook, wordt actief bestreden. GroenLinks zal initiatief nemen tot een algemene Wet op gelijke behandeling, zonder uit-zonderingsbepaling." (GroenLinks, 1989, p. 30) "Adoptie wordt ook mogelijk gemaakt voor andere relatievormen dan het traditionele gezin, zoals homo- en lesbische paren." (GroenLinks, 1989, p. 32)	"Discrimination on the ground of race, color, ideological beliefs, sex, sexual preference, age, or on any grounds whatsoever, will be actively challenged. GreenLeft will take the initiative for a general Equal Treatment Act, without exceptions." "Adoption will also be made possible for relationships other than the traditional family, such as gay and lesbian couples."
	1994-1998	5	"Discriminatie op grond van ras, huidskleur, levensbeschouwelijke overtuiging, sekse, seksuele voorkeur of op welke grond dan ook wordt actief bestreden." (GroenLinks, 1994, p. 55)	"Discrimination on the ground of race, color, philosophical beliefs, sex, sexual preference, age, or on any grounds whatsoever, will be actively challenged."
	1998-2002	11	"Wanneer mensen een contract afsluiten voor wederzijdse zorgplicht, heeft dat voor de partners dezelfde rechtsgevolgen als een huwelijk, indien de partners dat willen. Adoptie wordt ook mogelijk voor niet-gehuwden, paren van hetzelfde geslacht en alleenstaanden." (GroenLinks, 1998, p. 23)	"When people conclude a contract for mutual duty of care, this has the same legal consequences for the partners as a marriage, if that is what the partners want. Adoption will also be possible for unmarried couples, same-sex couples and singles."
SGP	1989-1994	3	"De SGP wenst dat onder meer dat de zedelijkheids-wetgeving aanzienlijk wordt aangescherpt en dat het huwelijk in de wetgeving wordt erkend en gewaardeerd als instelling van God. Zogenoemde alternatieve samenlevingsvormen mogen dan ook niet gelijk worden berechtigd met het huwelijk." (SGP, 1989, p. 7)	"The SGP wishes that morality legislation is tightened considerably and that marriage is recognized and valued in the legislation as an institution of God. So-called alternative forms of cohabitation cannot be equally judged as marriage."
	1994-1998	2	"Officiële registratie van alternatieve samenlevings-	"Official registration of alternative forms of cohabitation

			"vormen doet het unieke en bijzondere karakter van het huwelijk geweld aan. De overheid mag daar niet aan meewerken. Dat geldt in het bijzonder voor registratie van leefvormen van mensen die niet willen of kunnen huwen (bijvoorbeeld homoseksuelen), waaraan groten-deels dezelfde rechtsgevolgen worden verbonden als aan het wettige huwelijk." (SGP, 1994, p. 11)	"violates the unique and special character of marriage. The government should not cooperate. This applies in particular to the registration of lifestyles of people who cannot or do not want to marry (for example homosexuals), to which the same legal consequences are largely attached as to legal marriage."
	1998-2002	3	"Het huwelijk is alleen mogelijk tussen en man en een vrouw; het zogenaamde "homohuwelijk" is niet mogelijk." (SGP, 1998, p. 36)	"Marriage is only possible between a man and a woman; the so-called "gay marriage" is not possible."
GPV	1989-1994	2	"De overheid dient deze ontwikkeling [van individualisering] naar vermogen tegen te gaan, onder meer door handhaving van de wettelijke erkenning van het huwelijk zonder juridische gelijkstelling met andere samenlevingsvormen." (GPV, 1989, p. 6)	"The government must combat this development [of individualisation] to its ability, by maintaining the legal recognition of marriage without legal equality with other forms of cohabitation."
	1994-1998	2	"Bij de schepping heeft God het huwelijk van man en vrouw ingesteld. De publieke betekenis ervan voor onze tijd komt tot uitdrukking in de wettelijke regeling van het huwelijk en van zijn rechtsgevolgen. Geen enkele samenlevingsvorm, waarvoor burgers in eigen verantwoordelijkheid kiezen, mag op één lijn met het huwelijk worden gesteld." (GPV, 1994, p. 15)	"God created marriage between husband and wife at creation. Its public significance for out time is reflected in the legal regulation of marriage and its legal consequences. No single form of cohabitation, for which citizens choose in their own responsibility, may be aligned with marriage."
	1998-2002	2	"Het huwelijk van man en vrouw is door God ingesteld. Daarom mogen andere samenlevingsvormen hieraan niet worden gelijkgesteld." (GPV, 1998, p. 11)	"The marriage of man and woman is established by God. Therefore, other forms of cohabitation cannot be equated with this."
RPF	1989-1994	1	"Gelijkstelling van andere samenlevingsvormen met het huwelijk (een instelling van God!) als doelstelling van beleid, alsmede financiële bevoordeling van buiten-echtelijke samenlevingsvormen wordt afgewezen." (RPF, 1989, p. 17)	"Equalization of other forms of cohabitation with marriage (an institution of God!) as a policy objective, as well as preferential financial treatment of extramarital forms of cohabitation is rejected."
	1994-1998	3	"Een ander terrein waar essentiële normen en waarden steeds meer in de verdrukking komen, is dat van huwelijk en gezin. [...]. De overheid is geroepen het	"Another area where essential norms and values are increasingly under threat is that of marriage and the family. [...] The government has the responsibility to

			huwelijk in ere te houden en blijvend als enige wettelijk erkende samenlevingsvorm te beschermen." (RPF, 1994, p. 11)	honor marriage and to continue to protect it as the only legally recognized form of cohabitation."
	1998-2002	3	"Het huwelijk behoort de enige door de overheid erkende samenlevingsvorm te zijn. Andere samen-levingsvormen kunnen niet aan het huwelijk gelijk-gesteld worden. Het zogenaamde 'homohuwelijk' krijgt geen wettelijke status." (RPF, 1998, pp. 9-10)	"Marriage must be the only form of cohabitation recognized by the government. Other forms of cohabitation cannot be equated with marriage. The so-called 'gay marriage' is not given legal status."

Appendix C

Dutch articles on SSM – "*homohuwelijk*" – in the national newspapers *Algemeen Dagblad, NRC Handelsblad, de Telegraaf, Trouw,* and *de Volkskrant*; and discourses used. Equality and human rights (E&HR) discourse. Red: Traditional meaning of marriage (TMM) discourse. White: Neutral/impartial discourse.

Year	Total	Date	Newspaper	Discourse
1990	35	10/02	Trouw	Neutral
		14/02	Trouw	TMM
		15/02	Trouw	Neutral
		16/02	De Volkskrant	E&HR
		24/08	Trouw	TMM
		30/08	De Telegraaf	E&HR
		30/08	NRC Handelsblad	E&HR
		31/08	NRC Handelsblad	E&HR
		31/08	Trouw	Neutral
		20/09	De Volkskrant	Neutral
		03/10	NRC Handelsblad	Neutral
		04/10	De Volkskrant	E&HR
		20/10	De Telegraaf	Neutral
		20/10	Trouw	Neutral
		20/10	De Volkskrant	E&HR
		24/10	De Volkskrant	E&HR
		27/10	De Volkskrant	E&HR
		27/10	De Volkskrant	E&HR
		30/10	NRC Handelsblad	Neutral
		31/10	De Telegraaf	E&HR
		31/10	Trouw	Neutral
		31/10	De Volkskrant	E&HR
		01/11	Trouw	TMM
		01/11	De Volkskrant	E&HR
		02/11	Trouw	Neutral
		07/11	Trouw	Neutral
		08/11	NRC Handelsblad	Neutral
		08/11	De Volkskrant	Neutral
		21/11	Trouw	TMM

		21/11	De Volkskrant	E&HR
		22/11	NRC Handelsblad	E&HR
		23/11	De Volkskrant	Neutral
		24/11	De Volkskrant	Neutral
		27/11	NRC Handelsblad	E&HR
		27/11	NRC Handelsblad	E&HR
1991	13	01/05	Trouw	E&HR
		28/05	De Volkskrant	Neutral
		28/05	De Telegraaf	E&HR
		28/05	Trouw	Neutral
		30/05	De Telegraaf	Neutral
		06/06	Trouw	TMM
		12/06	Trouw	E&HR
		22/06	De Volkskrant	E&HR
		23/06	Trouw	TMM
		09/08	Trouw	Neutral
		12/08	NRC Handelsblad	Neutral
		14/08	Trouw	TMM
		07/11	Trouw	E&HR
1992	3	04/01	De Volkskrant	Neutral
		16/06	De Volkskrant	TMM
		23/12	De Volkskrant	Neutral
1993	5	30/03	NRC Handelsblad	E&HR
		31/03	Trouw	Neutral
		01/04	Trouw	TMM
		01/04	De Volkskrant	E&HR
		15/04	De Volkskrant	E&HR
1994	9	10/02	Algemeen Dagblad	TMM
		11/03	Trouw	TMM
		02/04	De Telegraaf	E&HR
		04/05	Trouw	E&HR
		08/06	Algemeen Dagblad	Neutral
		08/06	De Telegraaf	Neutral
		08/06	Trouw	Neutral
		13/12	Trouw	Neutral
1995	24	28/02	Trouw	TMM
		21/03	Trouw	E&HR
		28/04	NRC Handelsblad	E&HR
		01/05	De Volkskrant	Neutral
		18/05	Trouw	Neutral

		12/06	NRC Handelsblad	Neutral
		12/06	Trouw	TMM
		12/06	De Volkskrant	Neutral
		13/06	De Volkskrant	TMM
		17/06	De Volkskrant	E&HR
		21/06	Trouw	Neutral
		24/06	De Volkskrant	E&HR
		06/07	Algemeen Dagblad	E&HR
		06/07	Trouw	E&HR
		17/07	Trouw	E&HR
		08/09	Algemeen Dagblad	E&HR
		08/09	NRC Handelsblad	Neutral
		09/09	De Volkskrant	E&HR
		09/09	De Volkskrant	E&HR
		16/09	De Volkskrant	E&HR
		18/10	Trouw	Neutral
		18/10	De Volkskrant	Neutral
		27/10	Trouw	Neutral
		06/11	Trouw	Neutral
1996	64	08/01	NRC Handelsblad	E&HR
		24/02	Trouw	Neutral
		26/02	Algemeen Dagblad	E&HR
		27/02	Algemeen Dagblad	Neutral
		27/02	NRC Handelsblad	Neutral
		28/02	Trouw	Neutral
		06/03	Volkskrant	TMM
		14/03	Trouw	TMM
		21/03	Trouw	Neutral
		25/03	Trouw	Neutral
		26/03	Trouw	TMM
		26/03	Trouw	TMM
		27/03	Trouw	TMM
		29/06	Algemeen Dagblad	E&HR
		06/03	De Volkskrant	TMM
		11/03	NRC Handelsblad	E&HR
			Trouw	E&HR
		20/03	NRC Handelsblad	Neutral
		20/03	De Volkskrant	TMM
		21/03	Trouw	Neutral
		21/03	De Volkskrant	E&HR
		22/03	De Volkskrant	E&HR

		25/03	Trouw	Neutral
		26/03	NRC Handelsblad	Neutral
		26/03	NRC Handelsblad	Neutral
		26/03	NRC Handelsblad	E&HR
		26/03	Trouw	TMM
		26/03	De Volkskrant	Neutral
		28/03	De Volkskrant	E&HR
		06/04	NRC Handelsblad	E&HR
		06/04	De Volkskrant	TMM
		16/04	NRC Handelsblad	TMM
		17/04	Algemeen Dagblad	E&HR
		17/04	Algemeen Dagblad	E&HR
		17/04	NRC Handelsblad	E&HR
		17/04	De Volkskrant	Neutral
		18/04	Algemeen Dagblad	Neutral
		18/04	De Volkskrant	TMM
		19/04	Algemeen Dagblad	Neutral
		19/04	NRC Handelsblad	TMM
		20/04	NRC Handelsblad	TMM
		20/04	De Volkskrant	Neutral
		20/04	De Volkskrant	E&HR
		23/04	Algemeen Dagblad	TMM
		23/04	NRC Handelsblad	TMM
		25/04	Algemeen Dagblad	TMM
		02/05	Algemeen Dagblad	E&HR
		02/05	Trouw	TMM
		23/05	NRC Handelsblad	Neutral
		24/05	De Volkskrant	TMM
		29/06	Algemeen Dagblad	Neutral
		13/07	De Volkskrant	TMM
		27/08	Trouw	TMM
		11/09	NRC Handelsblad	E&HR
		12/09	Trouw	TMM
		30/10	De Volkskrant	TMM
		09/11	Algemeen Dagblad	Neutral
		11/11	Trouw	Neutral
		04/12	NRC Handelsblad	E&HR
		05/12	Trouw	Neutral
		05/12	De Volkskrant	E&HR
		13/12	Algemeen Dagblad	Neutral
		13/12	NRC Handelsblad	Neutral

		13/12	Trouw	Neutral
1997	37	21/03	Algemeen Dagblad	E&HR
		17/05	Trouw	Neutral
		27/05	Algemeen Dagblad	Neutral
		27/05	De Volkskrant	Neutral
		29/05	De Volkskrant	E&HR
		30/05	Trouw	Neutral
		12/09	Trouw	E&HR
		27/10	NRC Handelsblad	E&HR
		28/10	Trouw	E&HR
		28/10	De Volkskrant	E&HR
		29/10	Algemeen Dagblad	E&HR
		29/10	NRC Handelsblad	E&HR
		29/10	Trouw	Neutral
		29/10	Trouw	Neutral
		29/10	De Volkskrant	Neutral
		30/10	Algemeen Dagblad	E&HR
		30/10	Trouw	TMM
		30/10	De Volkskrant	E&HR
		01/11	NRC Handelsblad	E&HR
		04/11	NRC Handelsblad	Neutral
		06/11	NRC Handelsblad	Neutral
		08/11	Algemeen Dagblad	TMM
		08/11	NRC Handelsblad	E&HR
		11/11	Algemeen Dagblad	TMM
		12/11	Algemeen Dagblad	E&HR
		15/11	NRC Handelsblad	E&HR
		19/11	NRC Handelsblad	TMM
		22/11	NRC Handelsblad	E&HR
		22/11	NRC Handelsblad	E&HR
		25/11	NRC Handelsblad	E&HR
		25/11	NRC Handelsblad	E&HR
		17/12	Algemeen Dagblad	Neutral
		19/12	Trouw	Neutral
		20/12	Algemeen Dagblad	E&HR
		20/12	NRC Handelsblad	E&HR
		20/12	NRC Handelsblad	Neutral
		31/12	NRC Handelsblad	Neutral
1998	41	07/01	Algemeen Dagblad	E&HR
		15/01	De Volkskrant	E&HR
		16/01	Algemeen Dagblad	E&HR

		16/01	De Volkskrant	E&HR
		17/01	De Volkskrant	Neutral
		20/01	Trouw	TMM
		20/01	De Volkskrant	E&HR
		22/01	De Volkskrant	E&HR
		23/01	Algemeen Dagblad	Neutral
		07/02	NRC Handelsblad	Neutral
		13/03	Algemeen Dagblad	Neutral
		26/03	Algemeen Dagblad	E&HR
		03/04	Algemeen Dagblad	Neutral
		03/04	NRC Handelsblad	E&HR
		03/04	Trouw	Neutral
		03/04	De Volkskrant	TMM
		20/04	Algemeen Dagblad	TMM
		21/04	Trouw	Neutral
		23/05	De Volkskrant	E&HR
		30/05	Algemeen Dagblad	Neutral
		30/05	NRC Handelsblad	E&HR
		30/05	De Volkskrant	Neutral
		04/06	NRC Handelsblad	Neutral
		18/06	Trouw	E&HR
		19/06	NRC Handelsblad	Neutral
		23/06	Trouw	E&HR
		11/07	Algemeen Dagblad	Neutral
		16/07	NRC Handelsblad	E&HR
		20/07	Algemeen Dagblad	E&HR
		23/07	NRC Handelsblad	TMM
		07/08	Algemeen Dagblad	E&HR
		10/10	Algemeen Dagblad	TMM
		10/10	Trouw	TMM
		03/12	De Volkskrant	TMM
		12/12	Algemeen Dagblad	E&HR
		12/12	NRC Handelsblad	Neutral
		12/12	Trouw	Neutral
		12/12	De Volkskrant	E&HR
		16/12	Algemeen Dagblad	TMM
		21/12	NRC Handelsblad	TMM
		23/10	Trouw	TMM
1999	19	02/01	De Telegraaf	E&HR
		18/01	Trouw	Neutral
		01/02	De Volkskrant	TMM

		26/03	Trouw	E&HR
		02/04	Algemeen Dagblad	E&HR
		03/04	Trouw	Neutral
		10/06	De Volkskrant	E&HR
		26/06	Algemeen Dagblad	TMM
		26/06	NRC Handelsblad	E&HR
		26/06	Trouw	E&HR
		26/06	De Volkskrant	E&HR
		28/06	Algemeen Dagblad	E&HR
		13/07	Trouw	E&HR
		14/10	Algemeen Dagblad	Neutral
		13/11	De Telegraaf	Neutral
		16/11	De Volkskrant	Neutral
		30/11	De Volkskrant	Neutral
		13/12	Algemeen Dagblad	Neutral
		23/12	De Volkskrant	TMM
2000	60	05/01	NRC Handelsblad	Neutral
		11/01	NRC Handelsblad	Neutral
		22/02	Trouw	Neutral
		09/03	Algemeen Dagblad	Neutral
		09/03	De Volkskrant	TMM
		21/03	Trouw	E&HR
		30/03	NRC Handelsblad	Neutral
		26/04	Trouw	Neutral
		19/06	Trouw	Neutral
		03/07	Trouw	Neutral
		04/08	NRC Handelsblad	Neutral
		09/08	De Telegraaf	Neutral
		01/09	NRC Handelsblad	TMM
		02/09	Algemeen Dagblad	E&HR
		02/09	NRC Handelsblad	E&HR
		02/09	Trouw	E&HR
		02/09	De Volkskrant	TMM
		05/09	Algemeen Dagblad	TMM
		05/09	NRC Handelsblad	Neutral
		05/09	Trouw	TMM
		05/09	Trouw	TMM
		05/09	De Volkskrant	TMM
		06/09	Trouw	Neutral
		06/09	Algemeen Dagblad	TMM
		06/09	De Volkskrant	E&HR

		08/09	Trouw	Neutral
		07/09	NRC Handelsblad	TMM
		07/09	De Volkskrant	Neutral
		08/09	Algemeen Dagblad	E&HR
		08/09	NRC Handelsblad	Neutral
		08/09	NRC Handelsblad	E&HR
		08/09	Trouw	E&HR
		08/09	Trouw	E&HR
		08/09	Trouw	E&HR
		09/09	Algemeen Dagblad	Neutral
		09/09	NRC Handelsblad	Neutral
		09/09	NRC Handelsblad	Neutral
		09/09	Trouw	Neutral
		09/09	De Volkskrant	E&HR
		11/09	Trouw	E&HR
		12/09	Algemeen Dagblad	E&HR
		12/09	De Volkskrant	E&HR
		13/09	Algemeen Dagblad	TMM
		13/09	NRC Handelsblad	Neutral
		13/09	De Telegraaf	Neutral
		13/09	De Volkskrant	Neutral
		14/09	NRC Handelsblad	E&HR
		14/09	NRC Handelsblad	E&HR
		06/10	De Volkskrant	TMM
		23/10	Algemeen Dagblad	Neutral
		24/10	De Volkskrant	TMM
		24/10	Trouw	TMM
		16/11	NRC Handelsblad	E&HR
		16/11	De Volkskrant	E&HR
		17/11	De Telegraaf	E&HR
		17/11	Trouw	E&HR
		20/11	Trouw	TMM
		24/11	Trouw	E&HR
		09/12	Trouw	E&HR
		19/12	Algemeen Dagblad	Neutral
		19/12	NRC Handelsblad	Neutral

Appendix D

German political parties and SSM or related positions between 2005 and 2017. Grey: in subsequent governing coalition. Green: supporting. Light green: favourable. Red: opposing. Light red: unfavourable.

Party	Term	Seats	SSM or related standpoint	
			Original	*Translated*
CDU/ CSU	2005-2009	226	"Deutschland ist bei der Geburtenrate Schlusslicht in Europa! [...]. Die Familie ist die wichtigste Form des Zusammenlebens. Wir stehen für den besonderen Schutz von Ehe und Familie. Menschen wollen in glücklichen persönlichen Umständen leben. Dies können Ehe, Familie und andere Formen des Zusammenlebens sein, die Sinn des Lebens, Sicherheit und Glück vermitteln. Weil wir die Zukunft wollen, ist unser Maßstab: Priorität für Familien und Kinder! Deshalb schaffen wir bessere Bedingungen für Familien und Kinder." (CDU/CSU, 2005, p. 24).	"Germany is at the bottom of the birth rate in Europe! [...]. The family is the most important form of living together. We stand for the special protection of marriage and family. People want to live in happy personal circumstances. This can be marriage, family and other forms of living together that convey the meaning of life, security and happiness. Because we want the future, our benchmark is: Priority for families and children! That's why we create better conditions for families and children."
	2009-2013	239	"Wir respektieren die Entscheidungen von Menschen, in vielfältigen Formen des Zusammenlebens ihren Lebensentwurf zu verwirklichen. Dies gilt für die Ehe und für nichteheliche Lebensgemeinschaften von Frauen und Männern ebenso wie für gleichgeschlechtliche Partnerschaften. Eine vollständige rechtliche Gleich-stellung solcher Lebensgemeinschaften mit der Ehe lehnen CDU und CSU ab." (CDU/CSU, 2009, p. 29).	"We respect the decisions of people to realize their life plans in various forms of living together. This applies to marriage and to non-marital relationships between women and men as well as same-sex partnerships. The CDU and CSU do refuse a complete legal equality of such partnerships with the marriage."
	2013-2017	311	"Ehe und Familie sind das Fundament unserer Gesellschaft. Familie und Kinder gehören für die große Mehrheit der Frauen und Männer in unserem Land zu inem glücklichen Leben. In der Familie suchen und finden Menschen	"Marriage and family are the foundation of our society. Family and children are a happy life for the vast majority of women and men in our

			German	English
			"Liebe, Geborgenheit und gegenseitige Unterstützung. Auch in Ehen, die ohne Kinder bleiben, übernehmen Männer und Frauen dauerhaft füreinander Verantwortung. Wir bekennen uns zum Verfassungs-gebot der besonderen Förderung von Ehe und Familie. Die Diskriminierung anderer Formen der Partnerschaft, auch gleichgeschlechtlicher Lebenspartnerschaften, lehnen wir ab. Wir wissen, dass auch in solchen Beziehungen Werte gelebt werden, die grundlegend für unsere Gesellschaft sind." (CDU/CSU, 2013, p. 38).	country. In the family, people seek and find love, security and mutual support. Even in marriages without children, men and women take responsibility for each other permanently. We are committed to the constitutional requirements of the special promotion of marriage and family. We reject the discrimination of other forms of partnership, including same-sex partnerships. We know that values are also lived in such relationships that are fundamental to our society."
SPD	2005-2009	222	"Der Staat mischt sich nicht mehr ein in die private Lebensgestaltung der Menschen und unterbindet die Diskriminierung von Minderheiten. Nichteheliche Kinder und gleichgeschlechtliche Partnerschaften haben heute weitgehend gleiche Rechte und Pflichten wie eheliche Kinder bzw. Ehepaare." (SPD, 2005, p. 11)	"The state no longer interferes with people's private lives and prevents discrimination against minorities. Non-marital children and same-sex partnerships today have largely the same rights and obligations as conjugal children or married couples."
	2009-2013	146	"Gleichstellung eingetragener Lebenspartnerschaften. Eingetragene gleichgeschlechtliche Lebenspartner-schaften werden wir mit der Ehe gleichstellen und bestehende Benachteiligungen abschaffen." (SPD, 2009, p. 62).	"Equality of registered civil partnerships. We will equate registered same-sex civil partnerships with marriage and abolish existing disadvantages."
	2013-2017	192	"Frei in ihren Entscheidungen sein und den eigenen Lebensentwurf verwirklichen – das wollen auch gleichgeschlechtliche Paare. [...]. Wir wollen die Ehe für gleich-geschlechtliche Lebenspartnerschaften öffnen und diese damit auch im Adoptionsrecht und im Steuerrecht gleichstellen." (SPD, 2013, p. 50)	"To be free in their decisions and realize their own life plan - same-sex couples also want that. [...]. We want to open the marriage for same-sex civil partnerships and thus equate them with adoption law and tax law."
FDP	2005-2009	61	"Neben die Ehe treten heute andere Formen des Zusammenlebens. Für Liberale sind alle Lebensgemeinschaften wertvoll, in denen Menschen Verantwortung	"Apart from marriage, other forms of living together occur today. For liberals, all partnerships are valuable in which

			German	English
			füreinander übernehmen. Verant-wortungsgemeinschaften dürfen nicht diskriminiert werden; rechtliche Benachteiligungen für neue Verantwortungsgemeinschaften müssen abgeschafft werden. Dazu gehört auch, daß Kinder in all diesen Verantwortungs gemeinschaften geschützt und besser gefördert werden." (FDP, 2005, p. 32).	people take responsibility for each other. Partnerships of responsibility must not be discriminated against; Legal disadvantages for new partnerships of responsibility must be abolished. It also means that children in all these communities of responsibility are protected and better supported."
	2009-2013	93	"Für Liberale sind alle Lebensgemeinschaften wertvoll, in denen Menschen Verantwortung füreinander über-nehmen. Verantwortungsgemeinschaften dürfen nicht diskriminiert werden. Wer gleiche Pflichten hat, verdient auch gleiche Rechte. Lebenspartnerschaften müssen mit der Ehe gleichgestellt werden, insbesondere im Steuerrecht, bei Adoptionen und im Beamtenrecht." (FDP, 2009, p. 35).	"For liberals, all partnerships are valuable in which people take responsibility for each other. Partnerships of responsibility must not be discriminated against. Who has equal duties, also deserves equal rights. Civil partnerships must be equated with marriage, especially in tax law, adoptions and civil service law."
	2013-2017	x	"Entsprechende Einstandspflichten existieren aber nicht nur zwischen Ehegatten, sondern auch zwischen Lebenspartnern. Daher sollten sie hier wie im Übrigen auch mit Ehepartnern gleichgestellt werden." (FDP, 2013, p. 12).	"Corresponding obligations [related to tax] exist not only between spouses, but also between life partners. Therefore, they should be equated here as well as with spouses."
Grüne	2005-2009	51	"Wir haben Lesben und Schwule vom Rand in die Mitte der Gesellschaft geholt: eine kleine Kulturrevolution. Wir kämpfen gegen die Ausgrenzung und gegen gesellschaft-liche und institutionelle Gewalt an Transsexuellen, Intersexuellen und Transgendern. Das Lebenspartner-schaftsgesetz für lesbische und schwule Paare hat in der Gesellschaft große Zustimmung gefunden. Damit ist der Boden bereitet, nun auch die Öffnung der Ehe für gleichgeschlechtliche Paare, das volle Adoptionsrecht und die volle rechtliche Gleichstellung von Lesben und Schwulen in Angriff zu nehmen."	"We have brought lesbians and gays from the margins to the center of society: a small cultural revolution. We fight against exclusion and against social and institutional violence against transsexuals, intersex and transgender people. The Life Partnership Act for lesbian and gay couples has found wide acceptance in society. Thus, the ground is now set to tackle the opening up of marriage for same-sex couples, the full

			(Grüne, 2005, p. 89).	adoption rights and full legal equality of lesbians and gays."
	2009-2013	68	"Im Gleichheitsartikel unserer Verfassung muss endlich ergänzt werden, dass niemand wegen der sexuellen Identität diskriminiert werden darf. Die Rechte der Homosexuellen und Transgender sind eine Frage von Demokratie und Menschenrechten. Auch deshalb kämpfen wir für die volle Gleichstellung gleich-geschlechtlicher Lebenspartnerschaften und ein menschenwürdiges Transsexuellenrecht. Wir fordern die Öffnung der Ehe für lesbische und schwule Paare, einschließlich des Adoptionsrechts." (Grüne, 2009, p. 155).	"The equality article in our constitution must finally add that no one should be discriminated against because of sexual identity. The rights of homosexuals and transgender people are a matter of democracy and human rights. That is one of the reasons why we are fighting for the full equality of same-sex civil partnerships and a dignified transsexual law. We demand the opening of marriage for lesbian and gay couples, including the adoption law."
	2013-2017	63	"Familie ist da, wo Kinder sind. Und Familie ist selbstverständlich da, wo Menschen füreinander einstehen und Verantwortung füreinander übernehmen. Kinder brauchen Eltern und Menschen, die sie lieben. Und es muss egal sein, ob die Eltern lesbisch, hetero oder schwul sind. Die ideologische Verweigerung des Adoptionsrechts und der Ehe für gleichgeschlechtliche Paare ist diskriminierend und muss überwunden werden." (Grüne, 2009, p. 11).	"Family is where children are. And of course, family is there where people stand up for each other and take responsibility for each other. Children need parents and people who love them. And it does not matter if the parents are lesbian, straight or gay. The ideological refusal of adoption law and marriage for same-sex couples is discriminatory and must be overcome."
Die Linke	2005-2009	54	"Um ihre [Bürger- und Freiheits] Rechte zu gewährleisten, fordern wir, endlich ein umfassendes Antidiskriminierungsgesetz zu beschließen und zu realisieren. [...]. Darin eingeschlossen ist auch die Öffnung der Ehe für Lesben und Schwule – mit allen Rechten einschließlich des Adoptionsrechtes." (Die Linke, 2005, p. 23).	"In order to safeguard their [civil and liberty] rights, we demand that a comprehensive anti-discrimination law be finally adopted and implemented. [...]. This includes the opening up of marriage for lesbians and gays - with all rights, including the right of adoption."
	2009-2013	76	"Lesben, Schwulen, Transsexuellen und Transgendern werden elementare Rechte verwehrt. Die eingetragene Partnerschaft besitzt deutlich weniger Rechte als die heterosexuelle Ehe. Im	"Lesbians, gays, transsexuals and transgender people are denied elementary rights. The registered partnership

		Einkommens-, Einkommenssteuer-, Erbschaftsund Adoptionsrecht werden Menschen aufgrund ihrer sexuellen Orientierung diskriminiert. Die Gleichstellung muss hier rechtlich vollzogen werden." (Die Linke, 2009, p. 40).	has significantly fewer rights than heterosexual marriage. In income, income tax, inheritance and adoption law, people are discriminated against because of their sexual orientation. Equality must be legally enforced here."
2013-2017	64	"Wir wollen nicht, dass überkommene und real diskriminierende Privilegien der Ehe beibehalten oder ausgeweitet werden. Auch Schwule und Lesben sollen heiraten können." (Die Linke, 2013, p. 40).	"We do not want to maintain or extend traditional and genuinely discriminatory privileges of marriage. Gays and lesbians should also be able to marry."

Appendix E

German articles on SSM – "*gleichgeschlechtliche Ehe*" or "" *Homo-Ehe*" – in the national newspapers *der Tagesspiegel, die Tageszeitung,* and *die Welt*; and discourse used. Green: Human rights (HR) discourse. Red: 'Special protection of marriage and the family' (SPMF) discourse. White: Neutral/impartial discourse.

Year	Total	Date	Newspaper	Discourse
2007	14	04/01	Die Tageszeitung	SPMF
		08/02	Die Tageszeitung	SPMF
		15/02	Die Tageszeitung	Neutral
		12/03	Die Tageszeitung	Neutral
		14/03	Die Welt	Neutral
		26/07	Die Welt	HR
		26/07	Die Welt	HR
		27/07	Die Welt	SPMF
		06/08	Die Tageszeitung	HR
		16/08	Die Welt	Neutral
		18/08	Die Tageszeitung	Neutral
		22/09	Die Tageszeitung	Neutral
		13/10	Der Tagesspiegel	Neutral
		13/10	Die Tageszeitung	Neutral
2008	22	02/01	Der Tagesspiegel	SPMF
		17/05	Die Tageszeitung	HR
		17/05	Die Welt	HR
		30/05	Die Tageszeitung	Neutral
		04/06	Der Tagesspiegel	Neutral
		10/06	Der Tagesspiegel	Neutral
		13/06	Die Welt	HR
		18/06	Die Tageszeitung	HR
		18/06	Die Welt	HR
		19/06	Die Welt	Neutral
		26/06	Die Tageszeitung	HR
		18/07	Die Tageszeitung	Neutral
		24/07	Der Tagesspiegel	Neutral
		24/07	Die Tageszeitung	Neutral
		21/08	Die Welt	Neutral

		05/11	Die Tageszeitung	Neutral
		06/11	Die Welt	Neutral
		07/11	Die Welt	HR
		08/11	Die Tageszeitung	Neutral
		17/11	Die Tageszeitung	HR
		05/12	Die Welt	HR
		22/12	Die Tageszeitung	Neutral
2009	37	11/02	Der Tagesspiegel	Neutral
		22/01	Die Tageszeitung	HR
		10/02	Die Tageszeitung	HR
		07/03	Die Tageszeitung	Neutral
		02/04	Der Tagesspiegel	Neutral
		03/04	Die Tageszeitung	HR
		08/04	Die Tageszeitung	HR
		14/05	Die Tageszeitung	HR
		22/05	Die Welt	HR
		28/05	Die Tageszeitung	Neutral
		05/06	Die Tageszeitung	HR
		22/06	Die Tageszeitung	HR
		25/07	Die Tageszeitung	HR
		03/08	Die Welt	HR
		11/08	Die Tageszeitung	Neutral
		21/08	Die Welt	HR
		26/08	Die Tageszeitung	HR
		09/09	Die Welt	Neutral
		18/09	Die Welt	Neutral
		19/09	Die Tageszeitung	HR
		23/10	Der Tagesspiegel	HR
		23/10	Der Tagesspiegel	HR
		23/10	Der Tagesspiegel	HR
		23/10	Die Tageszeitung	HR
		23/10	Die Welt	Neutral
		23/10	Die Welt	HR
		23/10	Die Welt	HR
		23/10	Die Welt	HR
		04/11	Die Welt	HR
		05/11	Die Tageszeitung	SPMF
		19/11	Die Tageszeitung	Neutral
		01/12	Die Welt	Neutral
		02/12	Die Welt	Neutral
		04/12	Die Tageszeitung	SPMF

		23/12	Die Welt	Neutral
		30/12	Die Tageszeitung	Neutral
		30/12	Die Welt	Neutral
2010	27	09/01	Die Welt	Neutral
		11/01	Der Tagesspiegel	HR
		17/02	Die Tageszeitung	HR
		22/02	Die Tageszeitung	Neutral
		04/03	Die Tageszeitung	Neutral
		15/06	Die Tageszeitung	SPMF
		16/06	Der Tagesspiegel	HR
		16/06	Die Tageszeitung	HR
		19/06	Die Tageszeitung	Neutral
		25/06	Die Tageszeitung	SPMF
		25/06	Die Tageszeitung	Neutral
		08/07	Die Tageszeitung	HR
		08/07	Die Welt	HR
		10/07	Die Tageszeitung	HR
		13/07	Die Tageszeitung	SPMF
		16/07	Die Tageszeitung	Neutral
		16/07	Die Tageszeitung	Neutral
		16/07	Die Welt	HR
		06/08	Die Tageszeitung	Neutral
		06/08	Die Welt	HR
		13/08	Die Tageszeitung	Neutral
		18/08	Der Tagesspiegel	HR
		18/08	Der Tagesspiegel	HR
		18/08	Die Tageszeitung	Neutral
		18/08	Die Welt	HR
		22/08	Der Tagesspiegel	Neutral
		23/08	Die Welt	HR
		07/10	Die Tageszeitung	Neutral
		06/11	Die Tageszeitung	SPMF
2011	29	12/01	Der Tagesspiegel	HR
		12/01	Die Tageszeitung	HR
		14/01	Die Welt	Neutral
		29/01	Die Tageszeitung	SPMF
		01/02	Die Welt	Neutral
		25/02	Die Tageszeitung	HR
		04/03	Die Welt	Neutral
		25/03	Die Tageszeitung	SPMF
		30/04	Die Tageszeitung	HR

		05/06	Der Tagesspiegel	Neutral
		06/06	Die Tageszeitung	Neutral
		16/06	Die Tageszeitung	Neutral
		21/06	Die Tageszeitung	Neutral
		22/06	Die Tageszeitung	HR
		22/06	Die Tageszeitung	Neutral
		27/06	Die Tageszeitung	HR
		29/06	Die Tageszeitung	HR
		16/07	Die Tageszeitung	HR
		25/07	Die Welt	HR
		29/07	Der Tagesspiegel	HR
		30/07	Die Tageszeitung	HR
		01/08	Die Tageszeitung	HR
		01/08	Die Welt	HR
		01/08	Die Welt	HR
		02/08	Der Tagesspiegel	HR
		02/08	Die Welt	SPMF
		08/08	Der Tagesspiegel	HR
		04/11	Der Tagesspiegel	HR
		30/12	Die Tageszeitung	HR
2012	63	15/01	Der Tagesspiegel	Neutral
		21/02	Die Tageszeitung	Neutral
		03/03	Die Tageszeitung	HR
		07/03	Die Tageszeitung	HR
		08/03	Die Welt	HR
		17/03	Die Tageszeitung	HR
		19/03	Die Tageszeitung	SPMF
		21/03	Die Welt	Neutral
		24/03	Die Tageszeitung	HR
		26/03	Die Welt	Neutral
		11/04	Die Tageszeitung	HR
		10/05	Die Tageszeitung	SPMF
		11/05	Der Tagesspiegel	HR
		11/05	Die Tageszeitung	Neutral
		11/05	Die Tageszeitung	HR
		11/05	Die Tageszeitung	Neutral
		11/05	Die Tageszeitung	HR
		11/05	Die Welt	Neutral
		19/05	Die Tageszeitung	HR
		08/06	Die Tageszeitung	SPMF
		08/06	Die Welt	HR

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	30/06	Die Tageszeitung	HR
	13/07	Die Welt	Neutral
	31/07	Der Tagesspiegel	Neutral
	02/08	Die Welt	HR
	03/08	Die Welt	Neutral
	05/08	Der Tagesspiegel	HR
	08/08	Der Tagesspiegel	HR
	08/08	Der Tagesspiegel	Neutral
	08/08	Der Tagesspiegel	HR
	08/08	Die Tageszeitung	HR
	09/08	Der Tagesspiegel	HR
	09/08	Die Tageszeitung	HR
	09/08	Die Welt	HR
	10/08	Der Tagesspiegel	HR
	11/08	Der Tagesspiegel	Neutral
	14/08	Die Tageszeitung	SPMF
	14/08	Die Welt	Neutral
	15/08	Die Welt	SPMF
	16/08	Die Tageszeitung	HR
	22/08	Die Tageszeitung	HR
	23/08	Die Welt	HR
	24/08	Der Tagesspiegel	HR
	02/09	Der Tagesspiegel	HR
	03/09	Die Tageszeitung	Neutral
	06/09	Die Welt	Neutral
	11/10	Die Tageszeitung	HR
	20/10	Die Tageszeitung	HR
	29/10	Der Tagesspiegel	Neutral
	03/11	Die Welt	Neutral
	08/11	Die Tageszeitung	HR
	08/11	Die Tageszeitung	HR
	18/11	Der Tagesspiegel	SPMF
	19/11	Die Tageszeitung	Neutral
	22/11	Die Welt	Neutral
	22/11	Die Welt	Neutral
	30/11	Die Welt	Neutral
	03/12	Die Tageszeitung	Neutral
	06/12	Die Welt	Neutral
	14/12	Die Tageszeitung	Neutral
	17/12	Die Tageszeitung	HR
	19/12	Die Tageszeitung	HR

		21/12	Die Welt	Neutral
2013	143	07/01	Die Welt	HR
		12/01	Die Tageszeitung	Neutral
		21/01	Die Tageszeitung	HR
		23/01	Die Tageszeitung	HR
		26/01	Die Tageszeitung	HR
		26/01	Die Tageszeitung	HR
		26/01	Die Welt	HR
		03/02	Der Tagesspiegel	HR
		04/02	Die Tageszeitung	HR
		07/02	Der Tagesspiegel	HR
		07/02	Der Tagesspiegel	HR
		07/02	Die Tageszeitung	HR
		07/02	Die Welt	Neutral
		13/02	Die Welt	HR
		14/02	Die Tageszeitung	HR
		15/02	Die Tageszeitung	Neutral
		20/02	Der Tagesspiegel	HR
		20/02	Der Tagesspiegel	HR
		20/02	Der Tagesspiegel	HR
		20/02	Die Tageszeitung	HR
		20/02	Die Welt	HR
		20/02	Die Welt	HR
		21/02	Der Tagesspiegel	HR
		21/02	Der Tagesspiegel	Neutral
		22/02	Der Tagesspiegel	HR
		24/02	Der Tagesspiegel	Neutral
		24/02	Der Tagesspiegel	HR
		25/02	Der Tagesspiegel	Neutral
		25/02	Die Welt	Neutral
		26/02	Der Tagesspiegel	HR
		26/02	Die Tageszeitung	Neutral
		26/02	Die Tageszeitung	Neutral
		26/02	Die Welt	SPMF
		27/02	Der Tagesspiegel	Neutral
		27/02	Die Welt	Neutral
		27/02	Die Welt	Neutral
		27/02	Die Welt	Neutral
		28/02	Die Tageszeitung	HR
		28/02	Die Tageszeitung	HR
		28/02	Die Welt	HR

		28/02	Die Welt	HR
		01/03	Der Tagesspiegel	Neutral
		02/03	Die Tageszeitung	HR
		02/03	Die Welt	HR
		03/03	Der Tagesspiegel	HR
		05/03	Der Tagesspiegel	Neutral
		05/03	Der Tagesspiegel	Neutral
		05/03	Die Tageszeitung	Neutral
		05/03	Die Welt	SPMF
		06/03	Der Tagesspiegel	Neutral
		06/03	Die Tageszeitung	HR
		06/03	Die Welt	HR
		11/03	Die Tageszeitung	HR
		11/03	Die Welt	SPMF
		11/03	Die Welt	Neutral
		12/03	Die Welt	Neutral
		13/05	Die Welt	SPMF
		14/03	Die Tageszeitung	HR
		14/03	Die Tageszeitung	Neutral
		15/03	Der Tagesspiegel	Neutral
		15/03	Die Welt	Neutral
		16/03	Die Welt	HR
		22/03	Der Tagesspiegel	HR
		22/03	Der Tagesspiegel	HR
		23/03	Die Tageszeitung	HR
		26/03	Die Tageszeitung	HR
		26/03	Die Tageszeitung	SPMF
		26/03	Die Welt	Neutral
		27/03	Der Tagesspiegel	Neutral
		27/03	Die Tageszeitung	HR
		27/03	Die Welt	Neutral
		28/03	Der Tagesspiegel	Neutral
		28/03	Die Tageszeitung	HR
		28/03	Die Tageszeitung	HR
		02/04	Der Tagesspiegel	Neutral
		11/04	Der Tagesspiegel	HR
		11/04	Die Tageszeitung	HR
		11/04	Die Welt	HR
		12/04	Die Tageszeitung	HR
		13/04	Die Tageszeitung	HR
		18/04	Die Tageszeitung	HR

		19/04	Die Tageszeitung	Neutral
		23/04	Die Tageszeitung	HR
		24/04	Der Tagesspiegel	SPMF
		24/04	Die Welt	HR
		26/04	Die Welt	HR
		07/05	Die Welt	HR
		14/05	Die Tageszeitung	HR
		16/05	Der Tagesspiegel	HR
		23/05	Die Tageszeitung	HR
		27/05	Die Tageszeitung	Neutral
		28/05	Die Welt	Neutral
		29/05	Der Tagesspiegel	HR
		30/05	Die Welt	HR
		04/06	Die Welt	Neutral
		07/06	Der Tagesspiegel	HR
		07/06	Der Tagesspiegel	HR
		07/06	Der Tagesspiegel	HR
		07/06	Die Tageszeitung	HR
		07/06	Die Welt	HR
		07/06	Die Welt	HR
		08/06	Die Tageszeitung	Neutral
		08/06	Die Welt	HR
		10/06	Die Tageszeitung	Neutral
		10/06	Die Welt	Neutral
		22/06	Der Tagesspiegel	HR
		23/06	Der Tagesspiegel	HR
		27/06	Der Tagesspiegel	HR
		27/06	Die Tageszeitung	HR
		27/06	Die Tageszeitung	HR
		27/06	Die Welt	HR
		27/06	Die Welt	HR
		27/06	Die Welt	HR
		28/06	Der Tagesspiegel	Neutral
		28/06	Die Tageszeitung	HR
		28/06	Die Welt	Neutral
		29/06	Der Tagesspiegel	HR
		30/06	Der Tagesspiegel	HR
		01/07	Der Tagesspiegel	HR
		02/07	Die Tageszeitung	HR
		05/07	Die Tageszeitung	HR
		08/07	Die Tageszeitung	Neutral

		18/07	Der Tagesspiegel	HR
		18/07	Die Tageszeitung	HR
		20/07	Die Welt	HR
		05/08	Die Tageszeitung	HR
		16/08	Die Tageszeitung	HR
		20/08	Die Tageszeitung	HR
		31/08	Die Tageszeitung	HR
		04/09	Die Tageszeitung	Neutral
		04/09	Die Welt	SPMF
		18/09	Die Tageszeitung	Neutral
		11/10	Die Welt	SPMF
		24/10	Die Welt	Neutral
		08/11	Die Tageszeitung	HR
		11/11	Der Tagesspiegel	Neutral
		13/11	Die Welt	Neutral
		21/11	Die Tageszeitung	Neutral
		30/11	Die Tageszeitung	Neutral
		02/12	Die Tageszeitung	Neutral
		02/12	Die Tageszeitung	SPMF
		03/12	Die Tageszeitung	HR
		13/12	Die Tageszeitung	SPMF
2014	20	06/01	Die Tageszeitung	Neutral
		16/01	Der Tagesspiegel	HR
		16/01	Die Welt	HR
		29/01	Der Tagesspiegel	Neutral
		30/01	Die Tageszeitung	HR
		10/02	Die Welt	HR
		30/04	Die Tageszeitung	HR
		23/05	Die Welt	HR
		10/06	Die Welt	Neutral
		20/06	Die Tageszeitung	HR
		22/06	Der Tagesspiegel	HR
		07/10	Die Tageszeitung	HR
		07/10	Die Welt	HR
		08/10	Der Tagesspiegel	HR
		08/10	Die Tageszeitung	HR
		09/10	Die Welt	HR
		21/10	Die Welt	Neutral
		27/10	Die Tageszeitung	HR
		29/10	Die Welt	HR
		20/11	Die Welt	Neutral

2015	114	07/01	Die Tageszeitung	HR
		18/01	Der Tagesspiegel	HR
		09/02	Die Tageszeitung	HR
		10/02	Die Tageszeitung	Neutral
		11/02	Die Tageszeitung	HR
		24/04	Der Tagesspiegel	HR
		24/04	Der Tagesspiegel	HR
		25/04	Der Tagesspiegel	Neutral
		21/05	Die Tageszeitung	HR
		22/05	Die Welt	HR
		24/05	Der Tagesspiegel	HR
		26/05	Der Tagesspiegel	HR
		26/05	Die Tageszeitung	HR
		26/05	Die Tageszeitung	Neutral
		26/05	Die Welt	HR
		26/05	Die Welt	HR
		26/05	Die Welt	HR
		27/05	Der Tagesspiegel	Neutral
		27/05	Der Tagesspiegel	HR
		27/05	Die Tageszeitung	HR
		27/05	Die Tageszeitung	HR
		27/05	Die Welt	Neutral
		28/05	Der Tagesspiegel	SPMF
		28/05	Der Tagesspiegel	HR
		28/05	Die Tageszeitung	HR
		28/05	Die Tageszeitung	Neutral
		28/05	Die Welt	HR
		29/05	Der Tagesspiegel	Neutral
		29/05	Die Welt	HR
		30/05	Die Tageszeitung	Neutral
		31/05	Der Tagesspiegel	HR
		31/05	Der Tagesspiegel	HR
		31/05	Der Tagesspiegel	Neutral
		02/06	Die Tageszeitung	HR
		02/06	Die Welt	HR
		03/06	Der Tagesspiegel	HR
		03/06	Die Tageszeitung	HR
		04/06	Die Tageszeitung	SPMF
		04/06	Die Tageszeitung	HR
		05/06	Der Tagesspiegel	Neutral
		05/06	Der Tagesspiegel	Neutral

	05/06	Der Tagesspiegel	Neutral
	05/06	Die Tageszeitung	HR
	05/06	Die Tageszeitung	Neutral
	06/06	Der Tagesspiegel	HR
	06/06	Die Tageszeitung	Neutral
	06/06	Die Tageszeitung	Neutral
	07/06	Der Tagesspiegel	Neutral
	07/06	Der Tagesspiegel	HR
	07/06	Der Tagesspiegel	HR
	08/06	Der Tagesspiegel	Neutral
	08/06	Der Tagesspiegel	Neutral
	08/06	Die Tageszeitung	Neutral
	08/06	Die Tageszeitung	HR
	10/06	Der Tagesspiegel	Neutral
	11/06	Der Tagesspiegel	HR
	11/06	Die Tageszeitung	Neutral
	11/06	Die Welt	Neutral
	12/06	Der Tagesspiegel	Neutral
	12/06	Der Tagesspiegel	HR
	12/06	Die Tageszeitung	HR
	13/06	Der Tagesspiegel	HR
	13/06	Der Tagesspiegel	Neutral
	13/06	Die Tageszeitung	HR
	13/06	Die Tageszeitung	HR
	13/06	Die Welt	Neutral
	15/06	Der Tagesspiegel	Neutral
	16/06	Die Tageszeitung	HR
	20/06	Der Tagesspiegel	HR
	20/06	Die Welt	HR
	22/06	Die Tageszeitung	SPMF
	25/06	Der Tagesspiegel	HR
	25/06	Die Tageszeitung	Neutral
	25/06	Die Tageszeitung	HR
	27/06	Der Tagesspiegel	HR
	27/06	Der Tagesspiegel	HR
	27/06	Die Tageszeitung	HR
	27/06	Die Welt	HR
	29/06	Die Tageszeitung	HR
	01/07	Der Tagesspiegel	Neutral
	01/07	Der Tagesspiegel	HR
	01/07	Der Tagesspiegel	HR

		02/07	Der Tagesspiegel	Neutral
		02/07	Der Tagesspiegel	HR
		02/07	Der Tagesspiegel	HR
		02/07	Die Tageszeitung	Neutral
		02/07	Die Tageszeitung	HR
		06/07	Der Tagesspiegel	Neutral
		07/07	Der Tagesspiegel	HR
		12/07	Der Tagesspiegel	HR
		14/07	Die Tageszeitung	Neutral
		15/07	Der Tagesspiegel	HR
		15/07	Die Tageszeitung	Neutral
		17/07	Der Tagesspiegel	Neutral
		17/07	Die Tageszeitung	Neutral
		24/07	Der Tagesspiegel	Neutral
		25/07	Der Tagesspiegel	Neutral
		25/07	Der Tagesspiegel	Neutral
		25/07	Der Tagesspiegel	HR
		25/07	Die Welt	Neutral
		25/07	Die Welt	Neutral
		26/07	Der Tagesspiegel	HR
		27/07	Der Tagesspiegel	HR
		27/07	Der Tagesspiegel	HR
		27/07	Die Tageszeitung	Neutral
		28/07	Der Tagesspiegel	HR
		22/08	Die Welt	Neutral
		28/09	Die Tageszeitung	HR
		05/10	Die Welt	HR
		01/12	Die Tageszeitung	HR
		22/12	Die Tageszeitung	SPMF
		22/12	Die Tageszeitung	Neutral
		24/12	Der Tagesspiegel	HR
		24/12	Die Tageszeitung	HR
2016	36	12/01	Die Tageszeitung	HR
		16/01	Die Welt	HR
		24/01	Der Tagesspiegel	HR
		30/01	Der Tagesspiegel	Neutral
		01/02	Der Tagesspiegel	Neutral
		12/02	Die Tageszeitung	HR
		12/02	Die Tageszeitung	HR
		27/02	Die Tageszeitung	HR
		26/03	Der Tagesspiegel	HR

		08/04	Der Tagesspiegel	HR
		10/04	Der Tagesspiegel	HR
		14/04	Die Tageszeitung	SPMF
		30/04	Die Tageszeitung	HR
		06/05	Die Welt	HR
		20/05	Der Tagesspiegel	HR
		20/05	Die Tageszeitung	HR
		23/05	Die Tageszeitung	HR
		25/05	Der Tagesspiegel	HR
		04/06	Der Tagesspiegel	HR
		06/06	Die Tageszeitung	HR
		07/07	Die Tageszeitung	HR
		21/07	Der Tagesspiegel	HR
		10/08	Der Tagesspiegel	HR
		13/08	Der Tagesspiegel	HR
		26/08	Die Welt	HR
		29/08	Die Welt	HR
		12/09	Die Tageszeitung	Neutral
		26/09	Die Tageszeitung	Neutral
		30/09	Die Tageszeitung	HR
		13/10	Die Welt	HR
		17/10	Die Tageszeitung	Neutral
		30/10	Der Tagesspiegel	HR
		31/10	Die Tageszeitung	HR
		11/11	Die Tageszeitung	SPMF
		18/11	Die Welt	Neutral
		30/11	Die Welt	SPMF
2017	32	13/01	Der Tagesspiegel	HR
		13/01	Die Tageszeitung	HR
		24/02	Die Welt	HR
		06/03	Die Tageszeitung	Neutral
		01/06	Die Tageszeitung	HR
		02/06	Die Tageszeitung	HR
		19/06	Die Welt	HR
		20/06	Der Tagesspiegel	HR
		21/06	Der Tagesspiegel	Neutral
		21/06	Die Tageszeitung	Neutral
		21/06	Die Welt	Neutral
		22/06	Die Tageszeitung	HR
		23/06	Die Welt	HR
		24/06	Die Tageszeitung	HR

26/06	Die Tageszeitung	HR
26/06	Die Tageszeitung	HR
26/06	Die Welt	HR
27/06	Der Tagesspiegel	HR
27/06	Die Welt	HR
28/06	Der Tagesspiegel	HR
28/06	Der Tagesspiegel	HR
28/06	Die Tageszeitung	HR
28/06	Die Welt	HR
29/06	Der Tagesspiegel	HR
29/06	Der Tagesspiegel	HR
29/06	Der Tagesspiegel	HR
29/06	Der Tagesspiegel	HR
29/06	Der Tagesspiegel	Neutral
29/06	Die Welt	Neutral
30/06	Der Tagesspiegel	HR
30/06	Die Tageszeitung	Neutral
30/06	Die Welt	HR