

**SPECIAL ISSUE ARTICLE**

# When global norms meet local politics: Localising transparency in extractive industries governance

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**Abstract**

Processes of norm localisation play a crucial role in shaping the extent to which global governance norms are institutionalised at national and sub-national levels. This article explores the politics of norm localisation through an empirical investigation of how global norms of “transparency” were localised in sub-national processes of extractive industry governance in Bojonegoro, Indonesia. Previous theories of localisation have emphasised “constructivist” dynamics through which patterns of norm localisation are shaped decisively by efforts to build normative or cognitive congruence with local ideas and identities. In contrast, the mix of a newly democratised environment, the persistent power of corporatist elite networks and a populist style of local politics prevailing in Bojonegoro have diminished the significance of such constructivist dynamics as a basis for explaining varied patterns of norm localisation. Instead, patterns of norm localisation have depended crucially on the capacity of local political leaders to harness global governance norms instrumentally as a basis for consolidating and strengthening their own local power base. These findings have important implications for both theoretical and practical understandings of how global norm localisation processes vary in response to the contrasting political contexts in which global governance norms targeting the extractive sector are implemented.

**KEYWORDS**

extractive industries governance, Indonesia, norm localisation, populism, transparency

## 1 | INTRODUCTION

In recent decades, transparency has been widely promoted as a global governance norm, comprising a key ingredient of broader international agendas of “good governance” and corruption eradication directed towards resource-rich countries (see Collier, 2007, p. 178; Stiglitz, 2007, p. 39). Transparency has been variously presented as a means of opening communication channels, facilitating scrutiny of revenues gathered from natural resource extraction, facilitating civil

society participation in natural resource governance and promoting accountability for how resource rents are channelled into the promotion of sustainable development (Barma, Kaiser, Minh, & Vinuela, 2012, p. 4).

Yet efforts to institutionalise such global governance norms at national and sub-national scales often encounter significant challenges when global norms come into tension with established normative frameworks at local levels. Efforts to implement transparency norms on the ground have been pursued through various policies and interventions. Those include a range of strategies that seek to correct failures of resource management and develop accountable resource

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governance through the timely disclosure of government information and the enhancement of strong multi-stakeholder involvement in monitoring (Bourgouin & Haarstad, 2013, p. 91; Mejía Acosta, 2013, p. 591). As part of this broader trend, new international standards, such as the Kimberley Process Certification Scheme (KPCS), the Extractive Industry Transparency Initiative (EITI)<sup>1</sup> and its progenitor, the global Publish What You Pay (PWYP) coalition, came to the fore of reform, seeking to impede rent-seeking behaviour and corruption through the disclosure of government revenue derived from extractive sectors (Corrigan, 2014; Hendrix, 2014). Although these schemes have made significant inroads, they have also been widely contested, and implementation has been mixed. For example, existing studies have shown EITI implementation to depend on a range of factors including local institutional quality and configurations of power and interest between state, business and civil society organisations (Bourgouin & Haarstad, 2013; Gonzales-Espinosa & Klein, 2013; Vijge, Metcalfe, Wallbott, & Oberlack, 2019).

Such challenges have been the subject of an expansive body of scholarship on “norm localisation” – the central focus of this special issue. Following Acharya’s influential definition (2004, p. 241), the concept of norm localisation is used here to refer to “... a complex process and outcome by which norm-takers build congruence between transnational norms (including norms previously institutionalised in a region) and local beliefs and practices.” This concept provides “a framework that explains how transnational norms are contested, adapted and incorporated into a new ... context” (Capie, 2008, p. 639).

While recognition that norm dynamics vary between contrasting local contexts centrally underpins the concept of norm localisation, existing scholarship on this issue has not systematically theorised how norm localisation varies across political contexts in response to contrasting political systems, regime types, or political styles. Instead, theories of norm localisation have tended to develop more general hypotheses regarding the mechanisms through which norm localisation occurs and conditions under which global norms are likely to be successfully institutionalised on the ground – focusing in particular on the importance of processes through which normative and cognitive congruence can be established between global norms and local cultural and political beliefs and practices.

To explore the robustness of such theories across a range of local political contexts, this article explores norm localisation dynamics within one particular political context that has been under-studied within existing norm localisation scholarship (cf. Bourgouin & Haarstad, 2013, p. 104), but which is highly significant for discussions of extractive industry governance: that is, newly democratised countries characterised by a populist political style. Populism can be broadly understood as a “political strategy through which a personalistic leader seeks or exercises government power based on direct, unmediated, uninstitutionalised support from large numbers of mostly unorganized followers” (Weyland, 2001, p. 14).<sup>2</sup> Of particular relevance to this article’s analysis are concepts of populism that focus on behavioural aspects of populist leadership through reference to a

populist “political style” (Bonikowski, 2016, p. 14; Moffitt, 2017, p. 46; Moffitt & Tormey, 2013, p. 388).

In contexts characterised by a populist political style, leaders rely heavily on rhetorical and performative strategies as means of building popular political support (Moffitt & Tormey, 2013, pp. 387–391). Previous scholarship on populism as a political style has demonstrated that the political mobilisation of norms often plays a crucial role in underpinning the rhetorical strategies of populist leaders (see Jayasuriya, 2006, pp. 126–145; Mas’udi & Kurniawan, 2017). Despite such evidence regarding the significance of a populist political style for the politics of norm contestation, the implications of such political contexts for theories of norm localisation have not been systematically explored.

In this article, norm localisation dynamics within this distinctive political context are examined through an investigation of how the global norm of transparency is promoted and institutionalised within sub-national processes of extractive industry governance in Indonesia. Analysis examines both the processes through which localisation occurs, and the conditions that enable and constrain local institutionalisation of these global norms.<sup>3</sup>

To develop this analysis, the article first examines theoretical debates concerning how and under what conditions global norms can be institutionalised at the local level, and how varied political contexts might be expected to shape such processes. This is followed by a brief discussion of the article’s methodology. Next, an empirical case study of the localisation of transparency norms in the oil and gas sector in Indonesia is presented. This empirical analysis is divided into two parts – results and discussion – which examine respectively: the broad congruence of global transparency norms with the post-authoritarian political climate in Indonesia, the rise of democratic populism as a political style in Indonesia, and the ways in which this political environment shaped uneven patterns of localisation of global transparency norms. The article concludes with some reflections on the article’s central findings.

While previous theories of localisation have emphasised “constructivist” dynamics through which patterns of norm localisation are shaped decisively by efforts to build normative or cognitive congruence with local ideas and identities, this article’s analysis demonstrates that such findings need to be adapted for a political context characterised by a democratic populist political style. Localisation of the global transparency agenda in this case was facilitated by significant congruence between global transparency norms and the political beliefs and practices prevailing within Indonesia’s post-authoritarian political environment. Nonetheless, patterns of norm institutionalisation remained very uneven, particularly with regard to transparency norms concerning public accountability and civil society participation. While norm localisation was facilitated to the extent that local political leaders harnessed global transparency norms in support of their own political strategies, transparency norms remained weakly institutionalised when they came into conflict with the instrumental political interests of local political leaders. While the article does not discount the importance of normative congruence as a basis for norm localisation, it therefore concludes that it is ultimately

the material political interests of local norm-takers rather than their normative or cognitive orientations that contribute most decisively to explaining varied patterns of norm localisation.

## 2 | THEORISING NORM LOCALISATION IN THE LOCAL CONTEXT

Early waves of research on how global norms travel to local contexts focused centrally on the role of international actors such as transnational advocacy networks in actively generating and diffusing global norms (Checkel, 1999; Keck & Kathryn, 1998). Particular attention was given to the role of so-called global norm entrepreneurs (Capie, 2008, pp. 639, 2012), defined by Finnemore and Sikkink (1998, p. 896) as agents who engage not only in normative agenda-setting, but also active promotion of norms.

As this body of scholarship evolved, the focus shifted towards an interest in actors situated at local (rather than global) levels, and the potentially crucial role of local “norm-takers” in shaping norm adoption processes. The concept of “norm takers” was coined in reference to local actors who according to Acharya (2004, p. 269) do not simply passively receive norms, but rather play a critical role in facilitating the norm adoption process. Depending on the context, these may take the form of government officials, civil society organisations or other individuals. The presence of these norm takers and their responses to global norms are now widely recognised to comprise important components of the norm localisation process.

A central focus of this evolving norm localisation scholarship has been the question of the conditions under which global norms are likely to be institutionalised at the local level in line with the original purposes of global normative agendas. One influential theoretical current has focused on the importance of normative, cognitive or cultural “fit” as a basis for explaining when global norms are likely to be accepted and institutionalised in a given local context. An important version of this account was developed by Acharya (2004), who argued that norm localisation is most likely to occur when outside norms can establish some form of congruence with established local beliefs and practices. Similarly, Eimer et al. (2016) argued that the particular characteristics of a given localisation process will depend importantly on the interplay between international pressure and domestic preferences, while Cortell and Davis (2000) highlighted the significance of “cultural match” between international norms and domestic understandings in determining the degree to which global norms achieve traction at the local level.

Building on this broad interest in enabling conditions for norm localisation, some scholars have focused on exploring specific mechanisms through which localisation occurs. Reflecting this interest, Acharya developed a sophisticated account of the mechanisms of norm localisation, and the agency of norm-takers in such processes. Acharya (2011, p. 4) argued that norm localisation is “...a dynamic process of constitutive localisation” that enables norm-takers to build congruence between local and external norms. The concept of constitutive localisation highlights the importance of existing ideas, norms, and culture as influences on an individual or community’s acceptance of new

norms. Since local actors as norm-takers are not “passive targets” (Acharya, 2011, p. 7), they may modify the meaning and scope of external norms. Such modification is necessary so that the norms can be coherent with existing local beliefs and practices and can fit the circumstances and preferences of local actors. According to this view, norm localisation occurs when successful fusion occurs between foreign and local ideas. Such an account resonates strongly with broader constructivist accounts of social change that focus on “micro-processes of persuasion and social influence” instead of “strategic calculation” as determinants of normative and behavioural change (Acharya, 2011, p. 3).

Although such broadly constructivist understandings of norm localisation mechanisms have been dominant within existing norm localisation scholarship, the potential significance of more strategic drivers of norm-taking behaviour has also been recognised. For example, Cortell & Davis (2000, pp. 76–77) underlined the frequent importance of instrumental strategies of rhetoric and performance by societal leaders as means of generating transformed collective understandings and building domestic salience of global norms. Such rhetorical strategies were viewed as potential means through which local norm-takers could seek to alter collective understandings amongst other social actors at the local level – serving in turn as a basis for strategically advancing their own material interests. As argued by Cortell and Davis (2000, p. 78): “international norms can become salient in the domestic discourse by being linked to important material interests... Any number of international norms may be consistent with a given constellation of domestic interests.”

Such work has tended to theorise the mechanisms through which norm localisation occurs – and associated conditions under which global norms are likely to be successfully institutionalised – in relatively general terms. Such analyses have rarely given explicit attention to the question of how norm localisation might be expected to vary across political contexts, for example reflecting varied political systems, regime types, or political styles. Nonetheless, a small number of authors have made some preliminary efforts to explore contextual factors shaping norm-takers’ responses to global norms, and associated norm localisation processes. For example, Shawki (2011) has highlighted the potential significance of factors such as government openness, state capacity, and the presence of supportive national or sub-national elites as enabling factors associated with successful norm localisation. Such analyses resonate with broader theories of political opportunity structures, developed in the context of analysing the influence of global social movements or advocacy coalitions. Such broader theories have often focused on political and institutional dimensions of the political environment “that provide incentives for people to undertake collection action...” and create enabling opportunities for the promotion of global norms (Gleditsch & Ruggeri, 2010; Meyer & Minkoff, 2004, p. 1459).

Analyses of contextual variation have also been developed in studies examining the localisation of specific norms, including some of the specialised literature focused on global transparency norms in extractive sector governance. Such literature has often focused on the distinctive dynamics of localisation associated with certain kinds of autocratic regimes – of central interest to many natural resource governance scholars. Such work has sought to uncover the preferences of norm entrepreneurs and norm-takers and the underlying

political motivations driving the adoption of transparency within particular regimes (David-Barrett & Okamura, 2016; David-Barrett & Okamura, 2013; Gillies, 2010). For example, depending on context, governments may be motivated to adhere to the EITI in pursuit of material benefits promised by international actors in return for reform progress, or as a way of building a reputation for clean and transparent government with the international community (David-Barrett & Okamura, 2016, p. 242). In turn, such studies have provided the basis for analysis of the impact of global governance initiatives such as EITI on strengthened extractive industry governance at national levels (Corrigan, 2014), or less commonly, at sub-national scales (see Wilson & Van Alstine, 2014).

Such work has highlighted the responsiveness of norm localisation processes to varying motivations of local political leaders and acknowledged the ways in which such motivations – and associated political strategies for promoting global norms – can vary significantly across different kinds of political regimes. However, such sources of contextual variance have not so far been systematically or explicitly explored within existing scholarship on norm localisation. The following case study analysis aims to advance understanding of such contextually-responsive dynamics by exploring the implications of a democratic populist political context for processes through which global transparency norms have been localised in Indonesian extractive sector governance.

### 3 | RESEARCH METHODS

This article's analysis of norm localisation dynamics focuses on a case study of how the global norm of transparency is promoted and institutionalised within sub-national processes of extractive industry governance in Indonesia. Indonesia makes an ideal case for exploring norm localisation dynamics in the extractive sector. It has adopted various global initiatives targeting transparency as part of broader good governance reforms – Indonesia being a key supporter of the Open Government Partnership (OGP) initiative, and having participated in the Extractive Industry Transparency Initiative (EITI) since mid-2000 (see Rosser & Kartika, 2019; Soerjoatmodjo, Hanafi, & Triwibowo, 2014). At the same time, efforts to implement these global norms have encountered significant challenges in the context of Indonesia's newly democratised political system and the rise of populism.<sup>4</sup>

In view of high levels of decentralisation in post-authoritarian Indonesia, including decentralisation of significant responsibilities for extractive industry governance to sub-national levels, it makes sense in this context to focus analysis on a particular sub-national site of norm localisation.<sup>5</sup> A sub-national focus is particularly salient given that the EITI Global Standard has required since 2011 that compliant countries disclose material revenue flows at sub-national as well as national levels. While a small number of previous studies have examined the distinctive dynamics of EITI contestation and institutionalisation at sub-national scales (see e.g., Wilson & Van Alstine, 2014), sub-national processes of norm localisation have generally been under-researched.

Analysis focuses on norm localisation in the Indonesian Regency of Bojonegoro – a resource-abundant district in the province of East Java. Bojonegoro is a particularly appropriate location for studying norm localisation dynamics, since compared with other resource-rich districts in Indonesia, Bojonegoro has been a major focus of interest and concern for many international donors and civil society organisations seeking to implement transparency initiatives, such as the World Bank, PWYP, Tifa Foundation, and the Natural Resource Governance Institute (NRGI). This focus can be explained in part by the fact that the discovery of large reserves of oil and gas in Bojonegoro coincided in temporal terms with the rise of global attention to the so-called “resource curse,” and associated efforts by international actors to promote transparency as part of a broader good governance agenda. In contrast, most oil-rich regions in Indonesia have been exploited since the oil boom era in the 1970s (see Smith, 2007).

The authors collected the data through several methods. As part of the authors' involvement in policy advocacy and capacity building in enhancing transparency in resource governance in Southeast Asia, organised by RegINA,<sup>6</sup> the authors conducted a series of field visits in Bojonegoro from 2014 to 2017 and early 2019 (six times). During these periods of fieldwork, the authors conducted participatory observation as well as facilitating and participating in a series of meetings and group discussions with the head of district, key local government officers, local communities and local civil society organisations. Furthermore, the authors conducted in-depth interviews and discussions with local government officers, local CSO activists, national CSO activists, staff in charge of international donor agencies and NGOs that work on the EITI, in Bojonegoro, Yogyakarta and Jakarta from 2013–2019. Analysis also draws on previous studies on both transparency and local politics in Bojonegoro, supplemented by information from news outlets, including both online local and national media and newspapers.

### 4 | RESULTS: LOCALISING TRANSPARENCY IN SUB-NATIONAL RESOURCE GOVERNANCE IN INDONESIA

Discussion now turns to the empirical case study of norm localisation processes in Indonesia, examining how local actors linked external norms with established local norms and practices, and how such strategies reflected distinctive features of the local political context. This section first explores the opportunities for norm localisation created by Indonesia's post-authoritarian environment. It then examines the distinctive features of the populist political style and corporatist power structures prevailing within post-authoritarian Indonesia. Finally, it examines the ways in which this distinctive political environment shaped uneven patterns of localisation of global transparency norms in the case of Bojonegoro.

Analysis of this case reveals that the localisation of global transparency norms was facilitated to some extent by normative and cognitive congruence between global transparency norms and prevailing beliefs and identities within post-authoritarian Indonesia. However,

patterns of norm localisation were highly uneven, closely tracking the political interests of populist local elites. Norm institutionalisation was facilitated by the frequent capacity of local elites to harness global transparency norms as part of broader rhetorical strategies seeking to bolster their own political support base. In contrast, where global transparency norms conflicted with local elite interests, normative congruence was not sufficient to override these interests, and the adoption of global norms remained more tightly circumscribed.

#### 4.1 | New spaces for localising transparency in Indonesia's post-authoritarian environment

Following broader global trends associated with agendas of "good governance" in extractive sector governance, global transparency norms were promoted within Indonesia by broad-based coalitions of global and national norm entrepreneurs. The central coalition promoting transparency norms in Indonesia encompassed sub-national, national and international NGOs, with each group adopting complementary roles and responsibilities. International actors, notably the Natural Resource Governance Institute (NRGI), played a significant role in mainstreaming and diffusing the resource curse discourse and associated notions of transparency among Indonesian civil society organisations and government officials – both through financing projects and exchanging ideas.<sup>7</sup> National NGOs also facilitated capacity-building for local CSOs via provision of grants for institution-building and knowledge-sharing exchanges between local and national CSOs in Indonesia and the wider Southeast Asia region.<sup>8</sup>

The broad political and discursive environment within post-authoritarian Indonesia played an important role in creating conducive opportunities for global transparency norms to be promoted and institutionalised, as global transparency agendas resonated with emerging democratic norms and identities at the local level. Demands for political change and associated institutional reforms to governance systems following the fall of the authoritarian regime created a conducive environment for promotion of transparency norms, as part of wider good governance agendas. Economic crisis in the late 1990s fuelled challenges to Indonesia's hyper-centralised authoritarian regime and helped to unlock strong demands for democratisation and decentralisation as well as anti-corruption initiatives. Furthermore, following global tendencies towards a neo-liberal, Post-Washington Consensus paradigm of governance reforms (see Carroll & Jarvis, 2015a), these institutional reforms invited more involvement of non-state actors in policy reform and policy-making processes.

Not only did this environment mitigate against strong resistance to transparency norms, it also created opportunities for strong collaborative work between state actors and civil society organisations. Civil society organisations emerged as leading pro-democracy actors in Indonesia in the late 1990s, gaining significant legitimacy as reform actors that could support the development of democracy and the promotion of good governance in Indonesia's emerging democracy (see Budiman & Törnquist, 2001; Mietzner, 2012). The dominance of an

international agenda of global-development-cum-good-governance gave primacy to discourses of "social capital," "partnership" and "public participation" as core elements of the global development agenda. This positioned civil society organisations as key agents of governance reform, mobilisation of public participation and implementation of development programs (Carroll & Jarvis, 2015b, p. 292). In this context, vibrant civil society organisations mushroomed (Suharko, 2011, p. 463), building on established cross-organisational networks, and expanding such networks globally through new links with international NGOs and donors (Savirani, 2015; Subono, Priyono, & Samadhi, 2007). In short, the increasing number of global and domestic civil society networks, and their capacity to influence public discourse across a range of issues, gave Indonesian CSOs increased credibility and leverage in public affairs, particularly in the spheres of policy advocacy and global norm promotion, positioning these civil society networks as credible insider proponents of global norms promoting strengthened 'good governance' in the public sphere (see Hanif, 2013, p. 137).

Transparency norms were institutionalised in various ways by the national government, as part of these broader reform agendas. The Indonesian government sought to display its serious commitment to promoting transparency by introducing the Law No.14/2008 on Openness of Public Information, which allowed citizens to access all public documents and required all public institutions (including publicly funded organisations at all tiers of government) to publish such information. Indonesia's national government further embraced the promotion of transparency by participating as one of eight founding governments in the OGP in 2011. As one of the most resource-rich countries in Southeast Asia, the Indonesian government also opted to join the Extractive Industries Transparency Initiative (EITI) Global network. After a long process lasting for several years,<sup>9</sup> EITI International recognised Indonesia as a full member in October 2014, making Indonesia the second country to achieve EITI compliance in Southeast Asia, after the Democratic Republic of Timor Leste. Civil society coalitions promoting the global transparency agenda were extensively involved in supporting the Indonesian Government's efforts to complete the requisite stages, procedures and mechanisms for EITI candidacy and compliance (Hidayat, 2013; Soerjoatmodjo et al., 2014, p. 16).

#### 4.2 | The rise of populist politics in post-authoritarian Indonesia

While a more democratic Indonesia brought important opportunities for localisation of transparency norms at the national level, such changes occurred in parallel with a shift towards significant decentralisation of a range of governance processes, including key elements of extractive industry governance. These concurrent processes of democratisation and decentralisation were also associated with the emergence of a distinctive style of populist politics. A range of studies have highlighted the rise of populism in post-authoritarian Indonesia, both in the national political arena (Aspinall, 2015; Hadiz &





Robison, 2017; Mietzner, 2015), and at the sub-national level (Hamid, 2014; Mas'udi & Kurniawan, 2017; Pratikno & Lay, 2013).

The emergence of a distinctive style of populist politics in Indonesia responded in part to demands for more people-oriented political leaders, amidst a new democratic politics in the country. Introduction in 2005 of direct elections for the *gubernur* (head of the provincial government) and *bupati/walikota* (head of the district/municipality) intensified pressures for local rulers to respond to citizen demands in order to sustain their political support and legitimacy (Sulistiyanto & Erb, 2009). Pressure for reform also came from a range of international organisations, donors and development agencies that promoted decentralisation and “good governance” reform agendas in Indonesia (Hanif & Pratikno, 2012, pp. 193–195). Amidst such political transformations, local oligarchic power-holders struggled to retain their privileges by transforming and reorganising their power into new democratic political vehicles (see Hadiz, 2010), giving rise to a political environment in which corporatist structures of elite power persisted, alongside populist strategies of political legitimation.

The political style of populist political leaders that emerged in Indonesia during this post-authoritarian era resonated closely with accounts of a populist political style developed in wider scholarship on populism. First, theorists of populism have emphasised the tendency of populist political leaders to try and differentiate themselves from an elite establishment, invoking “othering” frames that highlight “the people versus corrupt elites” or “them versus us” (Moffitt, 2017, p. 43). In the Indonesian context, the emergence of a new populist breed of politicians was fostered by rising concern about large-scale and pervasive public corruption, as populist politicians sought to inspire new hope and promises for systemic reforms to fight corruption.<sup>10</sup> Theorists of populism have further viewed a populist political style as involving an emphasis on crisis, breakdown, and threat, and associated efforts to tap into citizens' hopes regarding the resolution of such problems as a basis for building political support (Moffitt, 2017, p. 45; Moffitt & Tormey, 2013, p. 391; Wolff & Zimmermann, 2016, p. 21). Likewise, the variety of populism that emerged in Indonesia framed itself as placing people at the centre, while challenging an elite establishment that was deemed to be a source of corruption, dysfunctionality and crisis (see Moffitt, 2017). A populist political style has been further described by Moffitt (2017) as entailing “bad manners,” a term that refers to leaders' efforts to directly address “the people” while bypassing the established system (Moffitt, 2017, p. 44; Moffitt & Tormey, 2013, p. 392). Resonating with this characterisation, Mas'udi et al. (2018, p. 2) have highlighted the tendency of populist leaders in Indonesia to pursue a political communication style based on “direct and unmediated relations” with the public (see also Pratikno & Lay, 2013).

### 4.3 | Norm localisation in Bojonegoro: Explaining uneven institutionalisation of global transparency norms

The emergence and intensification of this distinctive populist mode of local politics within Indonesia's post-authoritarian political

environment played an important role in shaping and constraining norm localisation dynamics in our sub-national case of Bojonegoro. The central sub-national decision-maker controlling the diffusion of transparency norms in Bojonegoro has been the Regent Head or *bupati* – the key political leader at the Regency level. The *bupati* is therefore the principal norm-taker in Bojonegoro on which the below analysis focuses.

As part of broader campaigns to promote transparency norms within Indonesia, national Civil Society Organisations (CSOs), working together with CSOs at the sub-national level, promoted a range of efforts to institutionalise transparency in Bojonegoro. For example, meetings and focus group discussions were organised to facilitate formulation of local regulations regarding transparency of oil production. Such initiatives built on broader efforts by the local government in Bojonegoro to strengthen local resource governance – efforts that had been ongoing since the local government started to exploit significant oil reserves in Blok Cepu in 2005. In 2008, the newly elected *bupati* of Bojonegoro, Suyoto, negotiated and signed a memorandum of understanding with the central CSO coalition involved in promoting transparency norms, in which the local government committed to work on developing a range of extractive sector governance reforms oriented towards adoption of transparency norms (Priyosusilo, 2012).

A major transparency initiative was developed over the subsequent 4 years, eventually giving rise in 2012 to a significant new district government regulation on oil and gas industry transparency. In 2012 the district government of Bojonegoro released the Peraturan Daerah (local regulation) No. 6/2012 on Transparency of Revenue, Environment, and Corporate Social Responsibility of Oil and Gas Exploitation. This primarily regulates four fundamental elements, namely (a) local revenue from oil and gas exploitation, (b) information concerning the socio-environmental impacts and risks of oil and gas exploitation, (c) corporate social and environmental responsibilities and (d) the establishment of a transparency team. This local regulation encouraged comprehensive access to information related to the oil and gas extractive industry, such as information regarding a profit-sharing fund, taxation, Participating Interests (PI),<sup>11</sup> environmental management standards, emergency standards, and companies' Corporate Social Responsibility practices, including the percentage and amount of their CSR budgets.<sup>12</sup>

Such policies have represented significant shifts towards institutionalisation of global norms promoting extractive industry transparency. In promoting these varied transparency initiatives, the *bupati* built on important areas of resonance between global transparency norms and local norms associated with Indonesia's post-authoritarian environment. Nonetheless, as we will see below, norm institutionalisation has remained circumscribed in significant ways. In particular, the processes through which these norms have been implemented have themselves failed to incorporate the kinds of commitments to norms of transparency, accountability and civil society participation that would be consistent with constructivist accounts of norm socialisation. Instead, patterns of norm institutionalisation tended to align with the contexts in which the norms were able to be used instrumentally by the *bupati* to support his own political

interests, through drawing on transparency norms to bolster a range of populist legitimization strategies. Thus, while normative and cognitive congruence between global and local norms helped to facilitate the overall salience of the transparency agenda within Indonesia, the uneven patterns of norm localisation observed in this case cannot be explained by variations in such patterns of convergence; rather, such variation closely tracks the political interests of local populist political leaders.

#### 4.4 | Instrumentalizing global transparency norms to support the political interests of local populist leaders

Consistent with the prevailing populist style of local politics, the *bupati* in Bojonegoro was often able to harness global transparency norms as part of a broader repertoire of populist legitimization strategies – emphasising his own differentiation from a “corrupt” elite establishment, highlighting external crises and threats as a basis for building political support, and building legitimacy for his political agenda through pursuing “direct and unmediated relations” with the public (Mas’udi et al., 2018, p. 2). As we see below, each of these strategies enabled the *bupati* to align promotion of the global transparency agenda with his own political interests.

##### 4.4.1 | Framing transparency norms as part of populist anti-corruption discourses

First, during his campaign to become the *bupati*, Suyoto, placed significant emphasis on exposure of the failures of the previous *bupati* – positioning himself in opposition to past practices of political corruption. Having secured a narrow and contentious electoral win in Bojonegoro, without support from a substantial majority of voters,<sup>13</sup> Suyoto then found himself under pressure to show that he could deliver more meaningful policies than simply exposing the failures of the previous *bupati* – making public claims that he would “fulfil my debt to the people in accordance with my promise during the campaign.”<sup>14</sup> Suyoto also needed to secure more support from grassroots groups, since he represented a modernist Islamic party (Partai Amanat Nasional-PAN), despite the majority of people in Bojonegoro being traditional Moslems. By embracing the global transparency agenda, Suyoto hoped not only to gain more support from civil society organisations, but also wider political support from grassroots groups and swing voters (Abdullah, 2014, p. 56). In this sense, adoption of transparency in Bojonegoro rested importantly on the norm's potential to serve as a political “vehicle” for Suyoto, as a local leader who had not yet secured sufficient popular support (cf. Acharya, 2004, p. 248). This strategy proved effective, with Suyoto being successfully re-elected for a second term in 2013, gaining 44.4% of the total vote, and winning 22 out of 27 sub-districts in Bojonegoro.

##### 4.4.2 | Framing transparency norms as a response to external threats or crises

Second, embracing transparency norms enabled Suyoto to reassure the national government that the local government's resource extraction agenda would not create risks of social conflict, which in turn could disturb the oil and gas production chain irreversibly. In numerous public meetings, Suyoto presented such policies and initiatives as means of guarding against risks or negative impacts of extraction that could trigger political instability and threaten his political support.<sup>15</sup> Such claims were also mobilised in support of his efforts to present the extraction policies as means of supporting his electoral promises to develop Bojonegoro to a level that would enable it to overtake the more prosperous neighbouring Lamongan district (Abdullah, 2014, p. 53). In these ways, Suyoto not only emphasised his promise to overcome the problem of corrupt government, but also underlined repeatedly the potential of transparency and open government to counter risks of the resource curse, and associated forms of social conflict, breakdown and crisis. Suyoto thus drew on well-established populist repertoires of political action as a response to citizens' aspirations for a new mode of politics to replace previous patterns of corruption (Moffitt, 2017, p. 45; Moffitt & Tormey, 2013, p. 391; Wolff & Zimmermann, 2016, p. 21).

Supported by international and national CSO networks, local norm-takers – including both the *bupati* and local CSOs – tried to increase awareness amongst the public and the *bupati*'s counterparts in local parliament regarding the importance of adopting transparency initiatives as means of preventing the so-called oil curse. To this end, local norm-takers identified and rehearsed certain key terms repeatedly, reinterpreting their meaning via links to established contextual discourses or agendas, and then dramatising the framing in order to gain broader public attention and understanding (cf. Acharya, 2011, p. 13; Finnemore & Sikkink, 1998, p. 897). The supporting coalition of CSOs framed the risk of a potential local resource curse in public deliberations, for instance, using phrases such as “escaping the resource curse” and “preventing the resource curse” in public campaigns, discussions and many public meetings in Bojonegoro.<sup>16</sup>

Furthermore, Suyoto attempted to convince other local actors that transparency offered a compelling panacea for a range of problems experienced by resource-rich regions in Indonesia. Suyoto often stated in various public meetings that without transparency, resource extraction was likely to generate social conflict and instability at the grassroots level.<sup>17</sup> He pointed to previous experiences of Indonesian resource-rich regions, highlighting the Janus-faced nature of extractive industries. On the one hand, extractive activities potentially contribute to local economic development, yet on the other hand, local people frequently experience significant social and environmental burdens, such as the loss of their primary income or other source of livelihood due to land acquisition for oil and gas projects. In an interview with an OGP official, he made a statement that mirrored a sentiment repeated in many other public meetings<sup>18</sup>:

Now we are getting a lot of oil and gas revenue ... and with that comes high expectations. ... We need public trust, and we need to explain what will happen, how much revenue we will receive, and where is the money going, and what for? This should be transparent ... Communication is the key. Trust is key. We don't want to lose the public's trust. [...] Trust comes from openness and transparency. We must be transparent with using our resources, with our budget; we must be open about our problems and our capacity [...]

By emphasising the resource curse as a threat to society and offering his transparency agenda as a potential means of preventing future crises, Suyoto was thus able to use the global transparency agenda as a means of strengthening his own populist support base.

#### 4.4.3 | Framing transparency norms as supportive of direct political communication with “the people”

Third, Suyoto drew on global transparency norms in support of populist legitimisation strategies involving direct forms of political communication with the public. Two days after he was first appointed as *bupati*, Suyoto introduced a direct weekly dialogue between local government officials and citizens from 1 p.m. to 3 p.m., scheduled to occur each week after the Muslim Friday congregational prayer – building on established practices whereby mosque members commonly engage in informal dialogue after the prayer. Suyoto claimed that this Friday dialogue aimed to increase public trust in government, channel public participation and create a space for public learning (Musthofa, 2016, p. 8). Suyoto sought to expand the public audience for these events by using both a local government-owned radio station (Malowopati FM) and a private radio station (Madani FM) to broadcast the weekly event live, and document a recorded version of the ensuing public dialogue.<sup>19</sup> By attaching his own public dialogues onto these established dialogue practices, Suyoto sought to raise the visibility of his government's transparency agenda, while representing this as part of a broader commitment to communicate directly with the public, in turn supporting his populist legitimisation strategy. Such strategies were further supported by communication initiatives such as the establishment of a 24-hours a day direct SMS line to enable citizens to communicate directly with the *bupati*.

Such strategies built in important ways on the domestic salience of global transparency norms – enabling Suyoto to connect the global norms with established discourses regarding avoidance of corruption and the oil curse as a means of building popular political support at the local level. Such congruence between global transparency norms and local concerns about corruption and broader social and environmental risks associated with the extractive sector supported norm localisation processes by enabling Suyoto to align promotion of global transparency norms with his own material political interests.

However, in evaluating the explanatory power of socialisation versus interest-based accounts of the enabling conditions for norm

localisation, it is also crucial to consider examples in which the adoption of transparency norms conflicted with elite local interests. As we see in the following section, processes of normative congruence-building proved to have weak causal effects on facilitating norm localisation when they came into tension with countervailing political interests of local elites.

#### 4.4.4 | Tensions between transparency norms and the political interests of local elites

Such threats to elite interests were particularly pronounced insofar as the global transparency agenda's emphasis on the role of transparency in strengthening broader processes of public accountability and civil society participation threatened to weaken the *bupati*'s personal control over natural resource governance processes. Two examples illustrate the ways in which such interests in retaining centralised and personalised policy control undermined the extent to which transparency norms were institutionalised, in spite of persistent rhetorical commitment to the agenda.

First, Suyoto regularly used local executive orders (Peraturan Bupati) as means of implementing transparency norms, instead of working through local regulations (Peraturan Daerah) that would require agreement from the local parliament. For instance, as part of a sub-national action plan for the OGP, Suyoto released the Peraturan Bupati No.33/2016 on open procurement, which aimed to develop a guide for enhancing transparent and accountable procurement processes in local government. This implementation strategy was clearly inconsistent with a broader normative commitment to transparency and accountability, yet served his individual political interests by enabling him to avoid public criticism and protracted negotiations in the parliament regarding sensitive aspects of the transparency agenda. A similar propensity to side-step transparency norms that conflicted with his political interests was reflected in Suyoto's approach to constituting a multi-stakeholder steering committee, which the OGP requires as a means of facilitating transparency and participation of representatives from local government, CSOs activists, private sector and academia. As reported by the OGP's Independent Reporting Mechanism (IRM), this committee incorporated limited participation from CSOs, academics, or local parliament members, weakening the transparency and accountability of local governance processes (Novenanto, 2017).

Second, significant limits to the adoption of global transparency norms were evident in relation to processes surrounding implementation of the local regulation on Transparency of Revenue, Environment, and Corporate Social Responsibility of Oil and Gas Exploitation, discussed above. In this case, methods of implementation further revealed a lack of commitment to principles of public transparency and accountability that would enable non-state actors, particularly civil society organisations, to exercise influence over policy-making (see Aaronson, 2011, pp. 53–54). A formal commitment to principles of civil society participation – as mandated by local regulation No. 6/2012 – was implemented via a specific initiative in which the



local government established a multi-stakeholder transparency forum in Bojonegoro. This multi-stakeholder forum was to operate within the context of a range of other formal participation mechanisms that were widely introduced in post-authoritarian Indonesia, such as the government's Development Planning Deliberative Forum (Musyawarah Perencanaan Pembangunan-MUSRENBANG), which was initiated through Law No.25/2004 on the National Development Planning System. Not only did such formal procedures reflect the demands of global transparency norms, they also resonated strongly with deeply entrenched local participatory practices, based around a kind of local deliberative forum called *musyawarah*, which is utilised in many areas of daily social life in Indonesia.

In practice, however, Suyoto's individual political interests in maintaining control over implementation processes led him to delay and dilute the practical implementation of such transparency norms. The initiative to establish a new multi-stakeholder transparency forum in Bojonegoro was delayed considerably<sup>20</sup> and civil society participation in the planned multi-stakeholder forum was constrained in significant ways. The transparency forum remained dominated by bureaucratic officials, while the local government only selected two local CSOs – the Bojonegoro Institute (BI) and the Institute of Development for Society – together with six community leaders to join the multi-stakeholder forum.<sup>21</sup> Moreover, one of the two local CSOs that were involved in the transparency forum had a very close interaction with Bupati, while the other stated that they had never been invited officially to participate in the meetings.<sup>22</sup> In short, the transparency forum remained dominated by bureaucratic officials under the control of the Bupati, while facilitating little meaningful access to local CSOs and Community Based Organisations. Furthermore, some members of the local parliament questioned the transparency forum's role in monitoring extraction activities or enhancing the availability of information regarding issues such as the collection and processing of oil (oil lifting).<sup>23</sup> In this sense, the multi-stakeholder forum can be more accurately characterised as an elite-focused corporatist policy process reflecting the persistence of long-established practices of state-corporatism, rather than as a bottom-up participatory mechanism operating in accordance with global transparency norms.<sup>23</sup>

Despite broad congruence between global transparency norms and prevailing ideas and identities within Indonesia's post-authoritarian setting, norm localisation thus remained circumscribed to the extent that these norms came into conflict with the political interests of local elites – limiting the institutionalisation of more participatory dimensions of the transparency agenda that threatened to challenge local elite interests.

## 5 | DISCUSSION

As the article's analysis of empirical results has demonstrated, norm localisation processes in this case were contingent on several interacting processes. First, at a macro-level, there had been a major domestic political change from an authoritarian to a democratic regime, which served as a structural catalyst to create demand for

new norms. Transparency norms proved congruent in many ways with the needs of the community in the post-authoritarian regime, which craved access to information and opportunities to improve their welfare.

Second, key local norm-takers, particularly the *bupati*, actively harnessed global norms to support local political agendas. Transparency was successfully presented as an opportunity to minimise the economic, social and political problems that might result from the exploitation of oil and gas activities, while capturing the economic and developmental benefits. Such congruence aided the localisation of global transparency norms by creating ongoing incentives for the *bupati* to support global transparency norms, enabling him to mobilise global transparency norms as symbolic resources to help enhance his own legitimacy. This enabled the norm to be institutionalised in important ways without significant disruptions to the established sub-national normative and political order, in which the *bupati* occupied a central role. Local norm-takers thus helped to facilitate norm localisation to the extent that there was strong alignment with established local interests and beliefs.

Nonetheless, pressures for norm localisation processes to accommodate the local political context also placed certain constraints on the ways in which the transparency norm was institutionalised. Efforts to institutionalise transparency remained focused on relatively superficial displays of direct communication and legal instalment, without development of more extensive forms of civil society participation or legal enforcement. Processes of policy reform continued to be dominated by elite politicians, reflecting an individualistic and corporatist style of local politics, while the role of the most affected communities in these norm localisation processes remained limited. In this sense, transparency norms were localised, but in ways that strengthened populist, figure-based local politics rather than institutionalising a more expansive interpretation of transparency norms – linked to more participatory traditions of democratic “good governance.” Bojonegoro's experience thus demonstrates how local elites can use the transmission and adaptation of global governance norms as an opportunity to strengthen their already privileged position in local politics.

In short, varied patterns of acceptance and localisation of the global transparency norm in Bojonegoro primarily tracked the degree to which global transparency agendas were aligned or compatible with the material political interests of local political norm-takers (Cortell & Davis, 2000, p. 77). Significant forms of congruence were present between global and local norms, but where these norms came into conflict with the interests of local political leaders in sustaining local political control, such normative congruence provided an insufficient basis to motivate consistent patterns of norm adoption.

This analysis has built on existing theories of norm localisation insofar as it has shown how norm localisation occurs through complex interactions between global norms and established local practices and beliefs. However, the article has also presented some important extensions to the largely constructivist view of the norm localisation process that has dominated previous scholarship. While such previous work has focused primarily on processes of ideational and identity

formation as a basis for building congruence between global norms and established local cognitive and normative frameworks, this article has illustrated that norm localisation processes within the populist political environment in Bojonegoro also depended importantly on more instrumental, strategic responses from local norm-takers. Such responses were driven not simply by a search for normative or cognitive congruence, but also by a strategic desire on the part of populist local leaders to consolidate and strengthen their own local power base.

By highlighting these dynamics in the context of this case, the article has underlined the broader theoretical importance of detailed attention to the instrumental motivations and strategic responses of local leaders, particularly within a populist political context. As the article has demonstrated, the propensity of populist local political elites to embrace external norms can be driven importantly by their own interests in gaining political authority and legitimacy, and not necessarily by a deeper search for normative or cognitive congruence. This reflects the strong performative and rhetorical features of a populist political style, together with the importance of symbolic resources in underpinning the power of individualistic, figure-based populist leaders.

## 6 | CONCLUSION

This article has contributed to debates about norm localisation processes in the governance of natural resource sectors through an investigation of how the global norm of transparency has been promoted and institutionalised within sub-national processes of extractive industry governance in Indonesia. The preceding sections showed that norm localisation relied crucially on local political leaders' ability to use global governance norms as a basis for consolidating and expanding their own local power base. Although this analysis has been largely explorative in character, these findings provide the basis for development of some preliminary hypotheses of potential relevance to other local contexts in which a democratic populist style of politics is influential. In such contexts, this article's analysis suggests that resonance of a given global norm with local norms, discourses and paradigms continues to be an important determinant of the prospects for norm localisation within such contexts, since populist political leaders rely on a broad base of popular support in order to sustain political power. However, the motivations and strategies of local norm-takers take on distinctive characteristics within populist political settings, reflecting the distinctively strategic or instrumental motivations of populist political leaders, and their reliance on rhetorical and performative strategies. Such dynamics of norm localisation are hypothesised to be important in other broadly democratic populist political contexts, characterised by similar strategies for building public support and legitimacy – whether at national or sub-national scales.

Not only does this analysis offer lessons of direct significance for other populist political contexts in which global norms are being promoted, it also highlights the potential value of more systematic work aiming to adapt theories of norm localisation to varied domestic

political contexts. Such work would not only offer new theoretical insights into causal mechanisms and enabling conditions associated with processes of norm localisation, but also have significant practical implications for ongoing efforts to promote the uptake and implementation of global governance norms seeking to strengthen extractive sector governance across varied and often challenging political contexts around the world.

## ACKNOWLEDGEMENTS

Special thanks to Kate MacDonald (University of Melbourne) for her very constructive & fruitful comments and feedbacks and Jewellord Nem Singh (the Institute of Political Science at Universiteit Leiden) for his initial comments. Thanks to Lembaga Pengelola Dana Pendidikan (LPDP) Indonesia for financing Hasrul Hanif's PhD study that enrich the insight and data of this manuscript. The authors also received a publication grant from the Faculty of Social and Political Sciences, Universitas Gadjah Mada, Indonesia in 2017 for finishing and editing of the manuscript.

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## ENDNOTES

- <sup>1</sup> EITI is an international initiative to mitigate the resource curse in resource-rich countries (Kasekende, Abuka, & Sarr, 2016) that aims primarily to reduce corruption in extractive industry through the improvement of transparency, the EITI is designed as a voluntary scrutiny mechanism (Klein, 2017). For further information on the EITI scheme, see <https://resourcegovernance.org/analysis-tools/publications/extractive-industries-transparency-initiative-eiti>. Accessed 4th May 2017.
- <sup>2</sup> "Populism" is a contentious political concept. Many existing studies of populism have focused on analysing populist ideology, discourses and political and organisational strategies. Such features have been shown to vary widely, encompassing both left and right ideologies, and strategies based on both loose networks and tight forms of party discipline (Moffitt & Tormey, 2013, p. 381). Other scholars have focused on behavioural aspects of performance or rhetoric, through reference to a populist political style (cf. Bonikowski, 2016, p. 14; Moffitt, 2017, p. 46; Moffitt & Tormey, 2013, p. 388). The latter is the primary focus of this article's analysis.
- <sup>3</sup> While some studies have focused on exploring the varied effects of localisation processes, ranging from straightforward adoption of global norms to various forms of adaptation or appropriation (Eimer, Lütz, & Schüren, 2016), this paper focuses on the broader concept of norm institutionalisation – reflecting a range of possible effects that are consistent with the values and purposes of the global norms.
- <sup>4</sup> A number of authors have analysed how Indonesia has emerged as a site of competition among various contemporary populist political styles, including secular nationalist populism versus Islamic-oriented populism (see Hadiz & Robison, 2017; Mas'udi & Kurniawan, 2017; Pratikno & Lay, 2013).
- <sup>5</sup> Decentralisation in Indonesia has led to local government receiving increased authority to approve licences for mining, along with important responsibilities for managing and allocating local revenue associated with mining activity (see Devi & Prayogo, 2013).

- <sup>6</sup> RegINA, is the Asia-Pacific Knowledge Hub for Better Governance in Extractive Industries, based in the Department of Politics and Government, Universitas Gadjah Mada, Indonesia, supported by the Revenue Watch Institute (RWI), which was merged with the Natural Resource Charter and re-branded as the Natural Resource Governance Institute (NRGI) in 2014.
- <sup>7</sup> The NRGI served as the coordinating institution and hub to facilitate norm diffusion not only in Indonesia, but also across the entire South-east Asia region. PWYP-Indonesia also developed a resource governance knowledge centre to facilitate the transmission of global norms and discourses from PWYP-Global to members of PWYP-Indonesia and government (national and local government).
- <sup>8</sup> Based on authors' observation and discussion with activists of Bojonegoro Institute, local CSO, at Yogyakarta and Bojonegoro (2015, 2019). Also based on authors' participatory observation when attending a range of Indonesian CSO forums and workshops regarding revenue management and decentralisation between 2013 and 2017. Both authors also served as the project coordinators of the RegINA's annual training that equips civil society organisations in the Asia-Pacific region with knowledge of extractive industries. The curriculum of the training also puts emphasis on transparency and decentralisation issues.
- <sup>9</sup> The adoption of the EITI at the national level was initiated by the vice chairman of the Corruption Eradication Commission, Erry Riyana Har-djapamekas. After a long process, the President of Indonesia finally released the Peraturan Presiden (Presidential Decree) No. 26/2010 on Transparency of National and Local Revenue of Extractive Industry (Soerjoatmodjo et al., 2014, pp. 14–15).
- <sup>10</sup> [https://www.transparency.org/news/pressrelease/corruption\\_perceptions\\_index\\_2016\\_vicious\\_circle\\_of\\_corruption\\_and\\_inequali](https://www.transparency.org/news/pressrelease/corruption_perceptions_index_2016_vicious_circle_of_corruption_and_inequali). accessed sixth August 2019.
- <sup>11</sup> Participating interest (PI) here refers to a right of local government – represented by a local government-owned enterprise – to participate in oil and gas exploitation.
- <sup>12</sup> Peraturan Daerah is an additional legal base of transparency since the central government has introduced the National Law No.14/2008. The National Law obliges every single public institution in Indonesia, including the district administration of Bojonegoro, to publish its public information and documents such as local annual budget allocations (Anggaran Pendapatan dan Belanja Daerah).
- <sup>13</sup> <https://news.detik.com/berita-jawa-timur/d-867709/kpu-mulai-rekapitulasi-suara-cabup-santoso-puasa-bicara>. Accessed on 18 May 2016. Based on the data from the local electoral commission in Bojonegoro, the direct election in Bojonegoro in 2007 showed that Suyoto only received 37.2% of the total vote, followed by his rival Santoso (32%) and Thalhah (30.7%).
- <sup>14</sup> Suyoto statement in discussion with the participants of RegINA's annual Asia-Pacific training in 2014.
- <sup>15</sup> Suyoto statement in discussion with the participants of RegINA's annual Asia-Pacific training in 2014, 2015 and 2016 at Bojonegoro. He also repeated such statements at Muhammadiyah International Forum, Leeds University, UK, 2017.
- <sup>16</sup> Based on authors' observations and discussions with activists at the Bojonegoro Institute, a local CSO, in both Yogyakarta and Bojonegoro (2015, 2019). See also <https://rrcindonesia.com/en/about-us/>; <https://pwyp-indonesia.org/en/category/publications/>; <http://bi.or.id/>; <https://www.article33.or.id/>
- <sup>17</sup> Based on authors' observation when the authors attended Suyoto's presentations and public meetings in Bojonegoro, Yogyakarta, Jakarta and Bogor between 2014 and 2017.
- <sup>18</sup> <https://www.opengovpartnership.org/stories/interview-with-the-regent-of-bojonegoro-suyoto-ngartep-mustajab/>. Accessed on 17th July 2019.
- <sup>19</sup> [https://jipp.jatimprov.go.id/?page=database\\_detail&id=43](https://jipp.jatimprov.go.id/?page=database_detail&id=43). Accessed 17th July 2019.
- <sup>20</sup> In 2015, The *bupati* released the Regent Decree No. 88/234/KEP/412.11/2015 on the Establishment of the Transparency Team. <http://pwyp-indonesia.org/id/1333/fgd-perda-nomor-6-tahun-2012-tentang-transparansi-migas-di-kabupaten-bojonegoro/>. Accessed May 16, 2017.
- <sup>21</sup> The Transparency Team consists of 11 representatives of local government units, one local state enterprise, two selected CSOs, one representative of an oil trade union, one local entrepreneur, and six community leaders from impacted villages nearby the oil wells.
- <sup>22</sup> Interview with local CSO activist, Bojonegoro, January 2019.
- <sup>23</sup> <http://www.suarabanyuurip.com/kabar/baca/tim-transparansi-migas-bojonegoro-mandul>. Accessed 15 December 2017.
- <sup>24</sup> Discussion with some CSO activists and researchers from Bojonegoro, Yogyakarta, April 2017.

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**How to cite this article:** Winanti PS, Hanif H. When global norms meet local politics: Localising transparency in extractive industries governance. *Env Pol Gov*. 2020;30:263–275. <https://doi.org/10.1002/eet.1907>