



A critical policy study on why introducing resource rent taxation in Norwegian salmon aquaculture failed

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ARTICLE INFO

Keywords:

Salmon governance
Norway
Resource rent taxation
Public good
Critical policy studies
Situational analysis

ABSTRACT

In Norway, the world's leader in salmon farming, the aquaculture industry has become a profitable business. Drawing on critical policy studies, this paper analyzes a recent proposal to introduce resource rent taxation on salmon aquaculture for distributing its superprofit for the public good. By mapping actors and positions in the debate, the paper sheds light on the social reasons that led to the proposal's rejection. It is argued that three positions emerged. The positions differ along two axes: rent and which community would benefit. The first position argues that aquaculture profits derive from natural resources and belong to local communities and to the national community. The second position denies that these superprofits can be categorized as rent and highlights issues of competitiveness. The third position seeks to distribute revenues locally as compensation for facilitating aquaculture. Although the debate about resource rent taxation was launched to debate the public-private issue, it turned into a fundamental disagreement about who should receive rents between the coastal municipalities and the state. The privatization of extraordinary revenue from common natural resources was no longer the focus.

1. Introduction

Norway is the world's largest exporter of farmed salmon. Current policy strategies show high expectations for Norwegian value creation from the ocean to increase in the future, with the sales value of farmed salmon projected to quintuple by 2050 [18,32:152]. At the same time, salmon farming is a contested public issue [9,16,27,49]. The cross-breeding of escaped farmed salmon with wild salmon and salmon lice affecting wild populations especially cause much dispute [3,13,38,44]. In 2017, the Norwegian parliament considered a proposal to introduce resource rent taxation (RRT)¹ to better distribute the extraordinarily high private profits arising from salmon farming. While previous aquaculture controversies focused on risks, uncertainties, and scientific expertise, putting a RRT in salmon farming on the political agenda addresses the question of what a transition to a 'blue economy' (e.g., through salmon farming) implies for the Norwegian welfare state. Norwegian democracy has traditionally drafted innovative approaches toward the collective governance of natural resources and welfare

distribution. For example, RRT on hydropower and oil revenue have been crucial elements in wealth distribution [52,57]. Now, aquaculture is so profitable a private business that the term "salmon billionaire"² has entered the language.

Nevertheless, suggestions for increased taxation of the aquaculture industry met resistance, and the idea of RRT did not move forward. Why did RRT in salmon farming fail to garner support? Drawing on critical policy studies, this paper analyzes the recent policy debate on introducing RRT on salmon aquaculture by mapping the actors and positions in the debate which began in 2018 when the Ministry of Finance appointed a committee to investigate additional taxation of the aquaculture industry in an NOU (Norwegian public report) [21]. The NOU format involves a broad review of the consequences of various policy proposals to assess possible changes and their effects. The final report, published in November 2019, recommended introducing RRT in salmon farming. However, the report was already outdated on the day of its publication because by April it was clear that the governing parties would not wait for the NOU. RRT was voted down at all annual party

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¹ The Norwegian term for this is grunnrenteskatt. A verbatim translation is 'ground rent tax'. This paper uses "resource rent taxation (RRT)" throughout. In this context, 'rent' is not used in the sense of 'rent for an apartment' but is an economic term signifying extraordinary revenue attributable to land as a factor of production. See also Section 1.1 for more information on rent and this tax.

² In Norwegian: laksemilliardær. For example, Gustav Magnar Witzøe, heir to SalMar (one of the world's largest producers of salmon) is Norway's richest individual.

meetings in spring 2019, more than six months before the report was due. Curtailing the policy-making process in this manner is unusual because advisory commissions normally play a vital role in developing public policy in the Nordic countries [15].

The key question analyzed in this paper is how this unusual departure of procedure came about. The broader relevance of the analysis is the question whether the Norwegian governance approach to distributing private benefits derived from the use of common natural resources is about to change. Voting down an RRT in aquaculture indicates that the treatment of the salmon industry deviates from previous treatments of the oil industry and hydropower arrangements. Such a shift in governing approach can have significant consequences for the future financialization of the welfare state, and inequality in Norway. Therefore, it is relevant to study the political dynamics of such a shift. As most political parties voted against distributing private income to public revenue, it is relevant to study how power, arguments, and persuasion were at play. The study is based on a qualitative analysis of available public material (namely, a recently published official government report on resource rent in aquaculture, the accompanying media debate, and public hearing statements).

1.1. Background: how shall Norway fund its future?

When Norwegian salmon farming began in the late 1960s, it was a small, pioneer-driven activity [11]. Locally-based entrepreneurs built facilities, skills, and finances from scratch. In the 1970s, Norwegian aquaculture expanded significantly and has since experienced both explosive development and ownership concentration. To tackle emerging issues, governance of the industry has changed continuously since the 1970s [2] in line with the different roles that aquaculture played. For example, aquacultures' socio-political component (as a response to declining employment opportunities at the coast) was once more outspoken than the economic objectives today. Accordingly, the role of municipalities, ownership questions, environmental questions, and transfer of wealth has been issues for local municipalities for years, and the government responded in various ways. The current policy approach focuses on coastal zone planning [58], concession politics [32, 33], regulating growth through a 'traffic light system' [10,47] (marking in green regions where expansion is permitted), and voluntary codes of conduct [48:178].

Public revenue derived from the aquaculture industry, that uses common natural resources, has come from the sale of licenses for production sites. In the earlier phases of the industry's development, concessions were sold under market value (between 3 and 10 million NOK) provoking international accusations of subsidizing the industry [32:155]. More recently, the auctioning of licenses has shown the real value of the licenses, which ranges from 55 to 65 million NOK [32:158], that go as a one-time payment to the state. Thus, public income from licenses has risen steadily over the years but this public income comes from the payment of a single fee for a license held in perpetuity. Given this system, the generation of future public revenues accordingly depends entirely on the issuance of new aquaculture licenses and is thus growth-dependent.

Overall, the regulation of growth by means of production capacity (measured as maximum allowable biomass) granted by licenses [32:161] contributes to establishing scarcity that again increases the profitability of the industry. This highly profitable aquaculture industry requires production sites in areas that have traditionally been considered publicly held. Such areas typically host a variety of other users; selling licenses effectively privatizes the areas and excludes other potential users—for the most part other local users. Apart from that, aquaculture caused environmental externalities, such as negative effects on other fish, wild salmon, and pollution in the areas. Further, the state supports aquaculture in many ways, such as through public investments in relevant R&D, raising the question how the returns of these public investments are collectively distributed.

The benefit to the public of the privatization of commonly held areas really got a public issue in 2009, when it became known that cheaply issued licenses were sold immediately afterwards with large gains [32:157]. The subsequent concentration of ownership made the distribution of benefits between municipalities and regions increasingly uneven [32:160]. To address it, the Aquaculture Fund (Havbruksfond) was introduced in 2016. The money from license purchases flows into this fund which distributes 20% of the collected fees to the state and 80% to the aquaculture municipalities.³

The Aquaculture Fund differs fundamentally from another, more famous fund that has characterized Norway and its welfare state: the Government Pension Fund,⁴ informally known as "the oil fund." The Aquaculture Fund distributes 2–3 billion kroner a year⁵ and does not long-term invest money such as funds normally do. "The oil fund", in contrast, holds currently ca. 11,000 billion kroner derived from resource rent taxation (RRT), that is, tax on the extraordinary revenue generated from oil resources in Norwegian waters. This collective distribution of extraordinary revenue (rent) from common natural resources is the key difference between the two sectors.

Rent is profits exceeding normal returns of investment, so called 'extraordinary revenue' or 'superprofit'. RRT is an economic solution to the problem of distributing such extraordinary profits derived from the ownership of land and natural resources (as opposed to profits derived from work efforts). The moral and political problems linked to private enrichment from natural resources has concerned economists such as Adam Smith, David Ricardo, and Henry George. In Norway, George's social-radical idea of RRT was implemented first with hydropower plants [57]. When oil was discovered in the Norwegian seabed in the 1960s, RRT was thus already well-established in the country and became a crucial element in the equitable distribution of oil revenue [52]. RRT on oil (and hydropower) had a central role in the economic development of Norway.

Given peak oil forecasts, as well as demands for more environmentally friendly energy sources, the state is trying to push transitions in its national economy. The 'blue economy' is seen as a potential major source of income in the future [50], but the question remains how Norway can maintain funding for the public good in the future. To have profitable industries is not necessarily the same thing as a well-funded welfare state. Therefore, voting down an RRT on aquaculture may represent a shift from an essentially distributive to a more capitalist governing model. This is the broader relevance of the debate analyzed in this paper.

2. Critical policy study as necessary complement to previous research

Much current social science scholarship addressing aquaculture is characterized by a focus on trade and markets, especially how to enable aquaculture industry growth [6,36] and assessing the costs and benefits of regulations. In this literature, questions of governing salmon are often already established as technical, which frames which questions are asked [19]. For example, existing literature either looks at aquaculture as a wicked policy problem in which uncertainties are to be eliminated and problems of sustainability solved [8,10,48], or evaluates the scope of environmental problems and the adequacy of regulations and public perceptions [47,53], or investigates alternative technical solutions [28, 31,35]. Accordingly, the main point of contention is presented to be whether and to what extent aquaculture affects the environment (e.g., the genome of wild salmon or the stock of crustaceans), and how best to

³ Fiskeridirektoratet. Havbruksfond. <https://www.fiskeridir.no/Akvakultur/Tema/Havbruksfondet>.

⁴ <https://www.nbim.no/en/>.

⁵ Fiskeridirektoratet. Havbruksfond. <https://www.fiskeridir.no/Akvakultur/Tema/Havbruksfondet>.

technically fix it. Overall, the academic literature presents salmon farming as a highly technicalized space in which science and technology are used as neutral arbiters and fixes.

The RRT debate, however, shows that salmon farming governance raises more than technical questions. Following Bailey and Eggereide [9], it is necessary to open up salmon farming governance for bigger issues, such as questions of justice. Similar to how changes occurred in Norwegian society due to the industrial oil age, a reorganization of socio-technical worlds will result with a transition to a 'blue economy' in which not only natural and technical dimensions, but also social, economic, and political dimensions, are present at every step [43]. Perceptions of distributive justice are an important aspect of such socio-politico-economic dimensions, that is, socially just allocation of resources, and the perceived fairness of how collective benefits and burdens are shared [1].

Mainstream policy studies on resource rent address politico-economic dimensions by calculating the available resource rent [29], by evaluating different systems of allocating rights to using the commons [40], or by assessing different causes for the emergence of superprofit [12]. Such economic studies provide valuable economic insights, but they do not study what resource rent means for definitions of public good and social values in Norwegian society. Democratic salmon governance concerns questions about collective life that cannot be answered solely by scientific, economic, or technical expertise: What kind of collective does Norway want to be? Who constitutes the "we" that shall benefit from non-oil resources in the future? Who do natural resources belong to? RRT is therefore essentially a moral and political question, not just a question of numbers.

Studying the political and social questions requires an interpretive approach that is sensitive to meaning making [63], multiplicity of values, and struggles over ideas [20], such as critical policy studies. This approach to policy analysis seeks to understand and explain the practical consequences of the specific meanings that are expressed and mobilized. As Deborah Stone [56] aptly put it: "Political reasoning is reasoning by metaphor and analogy. It is trying to get others to see a situation as one thing rather than another" [56:9].

Therefore, the analytical approach guiding this paper focuses on the use of analogies, problem definitions, and policy arguments because they are "intimately involved with relations of power and the exercise of power" [25:7]. By analyzing meaning-making, the approach enables an investigation into which publics and problematizations emerge in the RRT debate. This is important because what is established as 'common' in this debate draws potentially long-lasting boundaries between public and private goods, and between national and local communities.

2.1. A brief account of method

Situational analysis [17] undergirds the analytical approach used in this paper; a grounded analysis of research materials that involves continuously tracing and mapping actors, discourses, and positions. This type of analysis foregrounds meaning-making, emphasizing interpretations of topics and events [14]. The analysis here is based on qualitative document studies from two main sites: the NOU "Taxation of aquaculture industry" and the 130 statements submitted in the subsequent round of public hearings,⁶ as well as media articles in nationally distributed newspapers on RRT between March 1, 2019, and June 30, 2020. The media search in the database Retriever yielded 210 results, of which 101 were relevant hits (discarding duplication, wind power hits, and minor notes). While the media analysis was conducted manually in Nvivo, the analysis of the policy report and hearing statements for practical reasons was done on paper. Direct quotes were translated from

Norwegian to English by the author. The analysis focused particularly on themes that emerged in the documents, as well as arguments, analogies, and narratives. After an initial analysis that yielded 395 codes, these codes could be grouped and categorized into approximately 75 codes in a second round. This coding and sorting analysis generated a range of arguments and themes that can be roughly categorized according to three broad positions and respective actor groups.

3. Positions on distributive justice on resource rent taxation in salmon farming

A variety of actors delivered statements for the NOU public hearing or participated in the media debate. These were the aquaculture and supplier industry, coastal municipalities and other regional actors, political parties, trade unions, employer organization and other interest groups, journalists, universities, research institutes, and governmental agencies. Broadly, the positions, presented below, can be sorted along two axes: whether or not there was rent, and whether the rent should be distributed nationally or locally (Fig. 1).

3.1. Advocates: broadly distribute extraordinary revenue from natural resources

The main argument mobilized in favor of RRT in aquaculture was that natural resources belong to the community, so profits generated from using the community's resources need to fall back to the community. A majority of the committee⁷ writing the NOU advocated strongly for RRT. Rationalizing this position required that they engage in discursive work, namely, establish that salmon farming indeed uses natural resources, as done in the first paragraph of the NOU's + 200 pages. It makes an analogy between natural resources (water, minerals, oil) and natural advantages (such as oxygen-rich water, water stream conditions, appropriate temperature, and protection against extreme weather and wind). In the media debate, natural resources were similarly defined as the local area, fjords, or water; for example, the area was sometimes referred to as the 'sea commons.' Thus, the Norwegian climate, water conditions, and spatial conditions are defined as natural

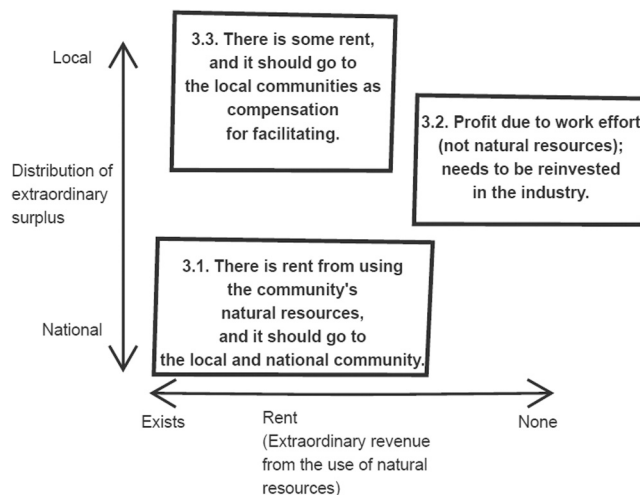


Fig. 1. Positions on RRT in salmon farming.

⁶ All the statements are available here: <https://www.regjeringen.no/no/dokumenter/horing-nou-2019-18-skattlegging-av-havbruk/id2676532/?expand=horingsvar>.

⁷ Led by an economics professor, the committee also had representatives from academia, advocates, and people from the trade union (LO), the Confederation of Norwegian Enterprise (NHO), and the Norwegian Association of Local and Regional Authorities (KS). The committee was given just over a year to conduct its investigation.

resources. An implicit argument was that the aquaculture industry survives only by using Norwegian nature, and that these natural resources are commons. Having established that aquaculture uses natural resources, the NOU's next step was to show that rent (that is, *extraordinary* revenue from the use of natural resources) existed [30]. Having done so, it further argued that one needed a tax to distribute rent.

Civic justification of fairness was a main theme in the NOU and the accompanying media debate. Media contributors argued that it was unjust that operators used common resources but kept the profits to themselves. For example, an editorial in the national newspaper *Verdens Gang* (VG) on March 7, 2019, stated:

“The salmon tax is about access to our common natural resources. [...] The point is that natural resources [...] and other gifts that nature has given to us belong to the community. [...] It is unreasonable if a few get access to our common resources and keep the entire profit themselves.” [60:2].

This quote evokes an ‘us,’ ‘our,’ and ‘common’. As shown below, who ‘we’ may be is highly contested. The notion of profit employed here also deserves attention. The ‘privatization of super profit’, so goes the argument, should be prevented. Advocates expect RRT to balance economic differences in the society. They further argue that such a rent would contribute to legitimizing the industry as well as produce a more stable, predictable income (than are afforded by the existing one-time payments to the Aquaculture Fund).

Thus, distributive justice in terms of distributing welfare generated from the communities’ resources back to the community is a central justification for advocates. However, the point of contention became defining who ‘the community’ is. In the view of the majority members of the NOU, this community was very encompassing. The NOU stated:

“The community, this means **all citizens in the entire country**, get a part of the rent generated based on the use of common natural resources, the host municipalities get incentives for facilitating the area **and future generations** get a part of the income derived from auctions of time-unlimited permission.” [46, p. 19, emphasis added].

The NOU highlights that Norway administrated the income from the oil sector such that the whole society benefitted from investments in education, public infrastructure, and public welfare. In this manner, the report builds on analogical reasoning, drawing a chain of equivalences from aquaculture to oil and hydropower. It connects salmon farming to the oil adventure and the Norwegian welfare state. By doing so, the NOU tries to enroll others in the committee’s view of the world. For example, it underscores that there has been broad agreement across Norwegian society to distribute rent from the oil and hydropower sector for the public good.

3.2. Industry: resource rent taxation threatens the economy

The positive viewpoints about RRT expressed above were disputed by opponents of such a tax, with the industry at the forefront of that opposition. The industry actively lobbied against the tax, drawing a dire picture of what would happen if the tax were enacted. For instance, the administrative directors of the Federation of Norwegian Industries and of the Norwegian Seafood Federation—pronounced opponents of RRT—claimed in an op-ed piece:

“The proposal for a special Norwegian tax on rent will reduce value creation and move Norwegian jobs out of Norway. This will cause the Norwegian coast’s most important future industry to falter. It is therefore wise to shelve the idea of a tax on rent now.” [39].

The two authors projected a story of decline: such a tax would shift investments, activity, and jobs to other countries. In general, arguments about competitiveness featured prominently in the industry’s position in the debate. The industry argued that the aquaculture industry was

already paying enough taxes and that resource rent taxation would hamper growth. They expressed concern about RRT’s potential impact on the industry, and consequently for Norwegian employment and local communities. According to them, profit should be reinvested in the industry rather than being paid to governments as taxes. This argument disregards the fact that investments would be deductible from the tax on rent.

The industry often referenced salmon farming’s historical emergence as a tough story of triumph over adversity by small farmers. This is a narrative of self-sacrifice by local pioneers who took significant risks, faced many backlashes, and invested their private fortunes in creating the industry. In this narrative, the aquaculture industry is depicted as vulnerable. The industry pointed to biological risks, a fluctuating economy, and previously low profitability. Future income was presented as highly uncertain. In the industry’s narrative, revenues were elusive, the lucrative upturn of the previous decade depicted as anomalous. The industry further claimed that profits derived from hard work and investments rather than from the use of natural resources.

Building on that last point, industry representatives denied that there was rent; that is, they stated the extraordinary revenue did not come from the natural resources. Instead, they argued that profits came from their own work efforts and investments: they raise the juvenile fish themselves, invest their own money in equipment, fed the salmon for two years, and then process the product for sale – all before turning any profit [4:29,23:37]. The industry claimed that equating aquaculture to oil and hydropower was a false analogy, using that argument to buttress its claim that aquaculture produces no rent. This line of reasoning positions oil as extracted, non-renewable resource that cannot be moved or renewed, whereas it claims that aquaculture can be conducted anywhere in the world [34:12,39:31] and is completely renewable. The industry also challenged the notion that sites for aquaculture could be considered a ‘limited resource’:

“Sea area in Norway is five times larger than the land area. Therefore, the sea is not a scarce resource.” (Bjordal in [55]:4).

Thus, the industry framed salmon farming as a movable resource, whereas ‘natural’ resources were considered bound in place ([37]:39, Sunde i [26]:24). Technological developments such as land-based facilities, they claimed, would make it possible to farm salmon anywhere. At a business conference, one of the biggest salmon farmers pointed out:

“The company that received the largest increase in value in 2019 was a land-based company in Miami, USA. In other words, there is no immobility.” [24:15].

Repeatedly referring to mobility was the industry’s threat to move plants outside of Norway. Overall, this is unsurprising rhetoric from an industry trying to prevent further taxation.

Nevertheless, it was notable how industry representatives deliberately evoked polarizations between center and periphery in their lobbying efforts. Anti-state positions are often found in urban-rural divides [7], and an opposition between the center and the periphery is a fundamental and important line of conflict in Norwegian politics [51]. Mobilizations against Oslo, centralization, and the state became a strong argument against RRT. Industry representatives said, for example:

“There is a reason why mayors all along the coast say ‘no’ to tax on rent. Then, the money goes to the state, and nobody believes there is anything left for the municipalities.” (Lier-Hansen i [61]:10).

The administrative director of the Norwegian Seafood Federation also stoked polarization, claiming that the state would take the tax in its entirety:

“What we fear is a proposal to introduce a tax on rent where the surplus from aquaculture is plowed into a state taxation. This will be to the disadvantage of the municipalities.” (Ystmark I [62]:12).

Opponents of tax on rent highlighted that salmon income was bound to a place, and they stressed local communities' role. In this manner, they drew a boundary between those who deserve income from salmon and those who do not, namely 'the state' or 'Oslo.' In recent years, the periphery of Norway has rebelled on issues such as wolves, local hospitals, windmills, and fishery quotas [5]. RRT thus lent itself to use as a red flag for those who feel wronged by the state because of natural resource extraction or through centralization policies [59]. The industry took advantage of this existing conflict line by deploying it in the resource rent controversy and by making itself out as the spokesmen for coastal communities in the periphery, arguing that the state wanted to take the local money, understating the strong ownership concentration, and ignoring the fact that 35% of salmon farms are now owned by international corporations [45:11], not by locals or even by Norwegian entities.

3.3. Local actors: question which community is deserving

As mentioned above, the committee writing the NOU was not unanimous in its conclusions. A minority number of committee members positioned themselves against RRT, arguing that one should distribute the income from natural resources, but that the major part of this payment should go to the local communities that surrendered its area for the economic use of others and that provided administrative and infrastructural support to the aquaculture industry. Within this position, situated on the upper left corner in the figure, the existence of rent is not questioned, but the recipient is. The local, coastal municipalities and regions where aquaculture is located are the deserving communities.

The coastal municipalities that delivered statements for the public hearing highlighted their local communities and how salmon farming was an essential part of local identity. They referred to how locating mattered both in terms of the aquaculture industry's siting on the coast and their own peripheral existence, both physical and in terms of influence. They constructed a common identity of aquaculture municipalities along the coast, using terms such as 'district municipalities', 'coastal municipalities', 'local communities along the coast', 'coastal communities', and 'peripheral local communities.' These terms underscored their self-perception as remote, cut off places, as one put it, an "island community way out at the mouth of the fjord." In the coastal municipalities' narrative, these cut-off places were vulnerable and in danger of being abandoned. There was little economic income. People moved away. Municipalities struggled for survival.

In this situation, they portrayed salmon farming as a lifeblood. Aquaculture meant development and economic growth, where before there was only doom and gloom. Aquaculture had reversed the population decline. To quote from the municipality of Frøya's hearing statement,

"For numerous coastal districts, the aquaculture industry more or less means to be or not to be." [22:3].

If local communities experienced salmon farming as existential, the industry's threats to move out of the country if RRT was introduced was an existential threat. Bearing that in mind, it is unsurprising that all the hearing statements by local municipalities and regions objected to RRT.

Nevertheless, this group of actors suggested that local communities should receive more financial compensation in return for making their sea area available to industry. Thus, while they were against RRT, they were not completely against more taxation. Some of them embraced a production fee or area tax: these terms' connotations became that the money went to local municipalities. A production fee is a tax not at all related to profit but to the amount of production. It is not a neutral tax like RRT. Despite of this, opponents to RRT ascribed very negative connotations to the term 'resource rent taxation' as tantamount to centralization, with the Treasury (in Oslo) transferring money from the local municipalities to the state. As part of this rhetoric, the RRT was

often called a 'special tax': a peculiarity of Norway that would treat aquaculture unfairly and differently from other businesses and that would expose the industry to disadvantages in a global market. Also employed in this line of reasoning was the term 'salmon tax'.

Despite the local position's demand for local compensation, there appeared to be strong loyalty among the local and regional representatives to the industry. For example, the hearing statements of Stavanger, Tromsø, and Meløy stressed that it was important for them to create good conditions for the aquaculture industry, to partner with the industry, and to interact with them in the best possible manner. This alignment between the industry's and the local government's positions is most prominent in the hearing statements to the NOU submitted by the Network of Fjord and Coastal Communities (NFKK) and the Norwegian Seafood Federation. Both suggested a production fee of 0,25–0,35 NOK per kilo of produced fish, suggested retaining the Aquaculture Fund and its current distribution mechanism, and were critical of money flowing to the state. Still, the difference of the third position in comparison to the second one is that local and regional actors did not deny the existence of rent; instead, they argued that it should benefit local communities.

4. Concluding discussion

The proposal for introducing RRT in salmon aquaculture was a potentially important move to secure equal distribution of wealth in the future Norwegian economy. Concerned groups voiced their views on this issue in the media and in the public hearing round. The findings reveal three different positions among relevant Norwegian stakeholders. The first advocates the introduction of RRT to increase the national distribution of income. The second, the position emanating from industry, denies the existence of rent. The third position, rooted in the local communities, is that local resources should benefit local communities, drawing a sharp distinction between deserving (peripheral/local) and undeserving (central/general Norwegian society) potential recipients.

The two latter positions were aligned, which is also represented in the result: In its 2020 Revised National Budget, the government did not propose a profit-based resource rent taxation, as the majority in the NOU had suggested half a year earlier. Instead, the government proposed introducing a production fee of 0.40 NOK per kilogram of produced fish in the 2021 National Budget [41:83]. This suggestion resembles the hearing statements put forth by the Norwegian Seafood Federation, the Federation of Norwegian Industries, and NFKK. Revenues from the production fee will provide an estimated 500 million NOK to the aquaculture municipalities and counties from 2022 and onward [42:152], whereas a RRT could have provided 7 billion NOK generally.

In sum, putting RRT on the political agenda could have opened reflective societal debate on questions such as who benefits from disturbing the ecology of fjords. However, RRT did not easily lend itself as a topic for public debate. There emerged an unfortunate confusion of terms (resource rent taxation, production fee, area tax, area rent, salmon tax, or special tax) in which 'resource rent tax' was given a very negative connotation. By the time the NOU was published, the debate was already so heated that the nuances in the NOU suggestions were not heard. For example, the NOU suggested not only a RRT but that such a tax be combined with a locally distributed production fee.

Apart from that, opponents dominated the public sphere. The industry was clearly most outspoken, mobilizing a story of fear by arguing that Norwegian aquaculture would lose out in international competition, resulting in the outsourcing of jobs and facilities to other countries and the decline of the entire sector. Industry presented itself as spokespersons for local communities, understating the fact that salmon farms were no longer owned by small local farmers as in the 1970s and that more than a third had been bought up by international corporations. Thus, the industry built on the strong center-periphery division and respective discussions in Norway. Judging from the analysis of

hearing statements, the few remaining advocates of RRT seem to be mostly academics, journalists, and economists, which amplifies the already established center-periphery boundary in the debate by adding an elite-laypeople distinction.

In this context, expert advice for establishing a resource rent fund that could distribute rent among local and national levels [59] has not yet received the attention it deserves. Analytical awareness about different positions can help policy actors to reflect on frames in a debate and to cope with controversy [54]. This paper has provided an overview of the positions in the Norwegian debate resource rent taxation with respect to aquaculture, and how it developed. This may help policy actors who want to reopen the debate.

Although the debate about resource rent taxation was launched by those who sought to debate the public-private issue, it ultimately became about the distribution between municipality and state. It turned into a fundamental disagreement about who should receive rents between the periphery and the center. Overall, the debate about tax on rent shifted into a problematization of *which* public deserves public revenue from aquaculture. State income was problematized, the need to compensate local communities for the facilitation of aquaculture was highlighted, and—most important—critique of the privatization of the commons and of private benefits was no longer in focus. Consequently, introducing a governance arrangement contributing to fair distribution of private benefits from common natural resources was prevented by polarizing mobilizations that stressed and reinforced a fragmentation of Norwegian society. This is disquieting because it potentially challenges the underlying sense of community that strongly distributive policies require.

Funding

This study was funded by the Research Council of Norway, project number 270623/O70, project title “Responsibility, practice and the public good across Digital Life.”

Author contributions

Heidrun Åm: Conception and design of study, Acquisition of data, Analysis and/or interpretation of data, Drafting the manuscript, Revising the manuscript critically for the important intellectual content, Approval of the version of the manuscript to be published.

Acknowledgements

I would like to thank Marte Frøyhaug for assistance with data acquisition and analysis, and Petter Grytten Almklov, Jostein Vik, and Jennifer Leigh Bailey, as well as two anonymous reviewers for comments on previous versions of the draft.

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