

Environmental policy integration in Europe

Administrative culture and practices

ISSN 1725-2237



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Cover design: EEA
Layout: EEA

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Luxembourg: Office for Official Publications of the European Communities, 2004

ISSN 1725-2237
ISBN 92-9167-767-1

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Contents

Acknowledgements	6
Executive summary	7
1 Introduction	11
2 EPI and the role of administrations	12
3 Making the environment a cross-departmental issue	15
4 The context for changing administrative culture and practice	18
5 Reviewing progress in Europe	21
6 Learning from experience	36
7 References.....	40
Annex A. EEA framework for evaluating EPI	43
Annex B. Environment and/or sustainable development advisory councils (EU-25).....	45
Annex C. Glossary	49

Acknowledgements

This report was developed under contract with the Institute of European Environmental Policy (Clare Coffey, Christina Jacobsen and Andrew Farmer), and managed by Ann Dom (EEA project manager).

In producing the report we benefited from the expert input of an advisory group, which consisted of: Tea-Darka Glažar, Ministry of the Environment, Spatial planning and Energy, Slovenia; Stig Wandén, Environmental Protection Agency, Sweden; Julius Langendorff, European Commission; Måns Nilsson, Stockholm Environment Institute, Sweden; Mr Ruben Mnatsakanian, Central European University, Hungary; Henrik Gudmundsson, National Environmental Research Institute, Denmark; Andrea Lenschow, Universität Osnabrück, Germany; Nikolaos Christoforides,

European Commission; Robert Wright, European Economic and Social Committee; Felix Luitwieler, Ministry of Housing, Spatial Planning and the Environment, the Netherlands; Ursula Platzer, Federal Ministry for Agriculture and Forestry, Environment and Water Management, Austria; Olivia Bina, Universidade Nova de Lisboa, Portugal; and Maggie Charnley, Department for Environment, Food and Rural Affairs, United Kingdom.

Valuable input was also received from the EEA's national focal points and peer reviewers including Andrew Jordan (University of East Anglia, United Kingdom), William M Lafferty (University of Oslo, Norway) and Adriaan Schout (European Institute for Public Administration).

Executive summary

Environmental policy integration (EPI) involves a continual process to ensure environmental issues are reflected in all policy-making, with a view to achieving sustainable development. EPI also supports more general efforts to coordinate activities which are also desirable from a purely economic and effectiveness perspective.

While political commitment to EPI has received much attention, there has been less attention given to ensuring that administrations are fully supportive. The EEA has thus developed a new EPI evaluation framework which includes 'administrative culture and practices' among its main categories.

This paper presents an overview of administrative culture and practices for EPI in Europe, and investigates some of the main management styles used. It reviews institutional structures and practices in the EU-25, the candidate and applicant countries, the countries of the European Free Trade Area (EFTA) and the countries of eastern Europe, Caucasus and central Asia (EECCA).

An administrative culture and practices conducive to EPI can be promoted in many different ways, using top-down and bottom-up approaches such as improvement of budgeting and auditing practices, internal management tools, institutional change and enhanced coordination mechanisms. The EEA's evaluation framework uses four questions to evaluate the extent to which administrations reflect EPI in their day-to-day working practices.

Do regular planning, budgetary and audit exercises reflect EPI priorities?

Countries are only just beginning to explore the potential role of regular planning, budgetary and auditing processes in

promoting EPI across administrations. Some examples are emerging, for example in the Netherlands, Norway and the UK, where attempts are being made to use budgetary, planning and audit processes to support EPI. However even these few countries are facing considerable challenges in terms of making strategic planning and budgeting really work for EPI.

The potential to strengthen the role of strategic processes for EPI depends on each country's approach to management and budgeting, with the greatest scope clearly being in countries that place greatest emphasis on strategic management initiatives, including new public management (NPM). This also appears to be reflected in practice, with the Netherlands, Norway and the UK also ranking amongst those most affected by the NPM agenda.

While a shift towards NPM could be seen as favourable to EPI, Sweden's experience with 'Management by Objectives' demonstrates some of the limitations of NPM, suggesting that it is not simply an opportunity but also a potential threat to EPI. The more rigorous the strategic management initiative, the more difficult it may be for environmental or other horizontal objectives to be 'added on' subsequently.

The potential to use auditing systems to evaluate progress in relation to EPI is largely untapped. Even where auditing has been valuable, auditors have tended to focus narrowly on examining the implementation of specific budgets or other financial measures, rather than assessing them in the light of broader sustainable development commitments and objectives. The UK's Environmental Audit Committee is the most obvious exception, and goes even further by focusing not only on environmental audit but extending beyond a purely financial remit.

Are environmental responsibilities reflected in the administration's internal management regime?

There are various ways in which EPI can be internalised in management systems. In practice, there is currently no evidence of a systematic embedding of EPI within management systems, although the introduction of EMAS and similar systems could address the allocation of responsibilities, structural arrangements and resources.

More specifically, there is little evidence of countries explicitly allocating responsibility for EPI throughout all departments and at different levels, which is important in order to ensure that EPI is pushed forward and reflected throughout administrations. However the development of strategic bodies has resulted in the engagement of more senior persons, including heads of ministries and ministers/prime ministers themselves.

Some restructuring has taken place, and environment units are now found in several countries' sectoral ministries. All countries have ministries with explicit environmental responsibilities. In several cases, environmental roles have been merged with other roles, to support more issue-oriented approaches. It is difficult to ascertain whether and how this is supporting EPI.

Systematic programmes to build up skills and other human capacity to cope with the new EPI agenda, and to ease the burden that EPI can place on increasingly pressured government departments, are not evident. The earmarking of financial resources for sector integration activities is evident in some cases, but is not keeping pace with new and emerging demands, including those resulting from the introduction of impact assessment and public consultation procedures. Overall figures for investment in EPI within administrations have not been assessed, partly because truly integrated investments are, almost by definition, not easy to identify.

Is there a strategic department/unit to guide and support EPI?

There has been some progress, notably in the EU-15 and EFTA countries, with establishing new departments, units or other bodies explicitly to ensure that EPI is taken forward at a strategic level. These are, however, more frequently aimed at taking forward sustainable development strategies rather than being specifically focused on EPI.

Where both political and administrative actors are involved, these bodies have the potential to act as a powerful conduit between political and administrative layers of government. The continued involvement of senior political figures is not always apparent, however. Moreover, according to their formal remits, the bodies appear to play a relatively passive role, placing little emphasis on positive guidance and support for EPI. Oversight work also appears to be quite limited, with little evidence of annual or other reports that require or lead to changes in practice.

Apart from internal strategic bodies to support integration, a large number of advisory councils have also been created, to follow and guide sustainable development and to a lesser extent, EPI activities. Not all EU countries have strategic or advisory bodies, however, nor are there equivalents at the EU level.

Are there mechanisms to ensure environment/sector coordination and communication, i.e. between departments and between levels of governance?

The extent and quality of coordination and communication between departments is particularly difficult to assess, although some patterns are emerging. The establishment of ad hoc or issue-specific communication and coordination mechanisms, for example, appears to be rather widespread. Permanent networks have also been set up in some countries, to aid communication between ministries

on issues relating to EPI. A focus on individual issues can be productive, perhaps supporting more substantive progress than might be expected using more general and blunt communication and coordination mechanisms. However, unless complemented by cross-cutting arrangements, issue-specific approaches can lead to some issues being neglected.

More general consultation mechanisms can also be important for EPI, but they generally result in only a limited degree of coordination or communication, the quality of which reflects dominant administrative styles and cultures, and existing personal relationships. All of these are rather difficult to 'manufacture'.

Coordination and communication between different levels of governance poses an additional if different set of challenges, particularly for federal countries. In the EU-10 as well as the candidate countries, there is considerable communication upwards. Communication and coordination downwards presents more of a challenge in larger, federal countries. Communication can be easier where regional/local decision-making is part of the structure of an environment ministry.

Key conclusions

The general picture that emerges is one of a small but growing body of practice in getting legal and political commitments to EPI reflected in administrations, their practices and their cultures. Various mechanisms, including instruments and institutional changes, are being employed in efforts to embed environmental thinking in government departments, activities and mindsets. The suite of mechanisms variously engages departments, as well as politicians and external stakeholders.

The extent to which mechanisms are used differs from country to country, particularly if one focuses only on EPI-specific mechanisms, rather than those introduced for sustainable development or

broader governance purposes. Adoption of EPI mechanisms is highest in a small group of EU and EFTA countries, notably the Anglo-Saxon, Nordic (including the Netherlands) and German-speaking countries. Within this group, the UK, Germany, Sweden and the Netherlands stand out as having made particular efforts to promote EPI although each has done so in different ways. In some cases, this has involved the introduction of new top-down structures, such as Germany's Green Cabinet and instruments such as budgetary processes, to push environmental integration down through the administration.

EPI is an ongoing process, not something that is simply 'achieved'. This underlines the importance of changing not only current practices but also administrative cultures, with a view to institutionalising EPI and protecting it from sudden changes. Administrations ensure that policy goals continue to be respected, long after politicians have moved to other issues, which is particularly problematic for challenges like EPI which generally have a low political profile over the longer term.

A number of conclusions are drawn from this review:

- there is a need for accessible information to support the use of the EEA's evaluation framework, particularly as regards the quality of structures, processes or other EPI-related developments and their impacts.;
- areas where information was particularly difficult to obtain related to EPI internal management systems and coordination mechanisms;
- the information deficit creates the possibility of a few practices, i.e. those most clearly related to EPI and those of a more directorial (and thus explicit) top-down nature, being held up as good examples, without there being any real appreciation of the more 'hidden' bottom-up initiatives;

- among the developments that are most explicit, both in terms of institution building and the introduction of instruments or tools for improving coordination, the majority are in fact concerned with SD rather than EPI. SD cannot be achieved without EPI, but the two are fundamentally different. In practice, a focus on the more nebulous concept of SD may be insufficient to ensure environmental objectives are fully reflected in policies;
- the EEA evaluation framework has demonstrated its usefulness for analysing and drawing lessons from countries, benchmarking and to inform 'soft coordination'. Further more detailed and qualitative evaluations could be undertaken on a case study basis, allowing proper in-depth assessment of more fundamental and subtle changes.

1 Introduction

Box 1: Environmental policy integration – the concept

Environmental policy integration (EPI) involves a continual process to ensure that environmental issues are reflected in all policy-making. According to Article 6 of the European Community Treaty, 'environmental protection requirements must be integrated into the definition and implementation of the Community policies and activities (...) in particular with a view to promoting sustainable development'. In practice this generally requires changes in political, organisational and procedural activities, so that environmental issues are taken on board as early as possible and during implementation. The result of EPI should be an overall improvement in policies and their implementation, in line with long-term sustainable development objectives.

Source: EEA, 2005

The EEA's recent review of environmental policy integration (EPI) in Europe (EEA, 2005) shows a progressive strengthening of political and legal commitment to environmental protection since the 1970s, with a set of 'core' environmental policies, and environment ministries and authorities responsible for their implementation. As stand-alone environmental policies have become more established, more attention has also been given to integrating environmental considerations into other policies. This trend has been reflected in national environmental plans, which have in many cases been followed by integrated sustainable development strategies (SDSs) and, in a few cases, EPI strategies.

While political commitment to EPI has received much attention, there has been less on ensuring that administrations are fully supportive (Jordan *et al.*, 2004). In order to ensure more transparent progress, the EEA's new EPI evaluation framework (see Annex A) includes 'administrative culture and practices' amongst its main categories, alongside political commitment, vision and leadership, impact assessment and consultation, policy instruments, and monitoring and learning from experience. Evaluation of progress in relation to administrative culture and practices requires answers to the following questions (see the cross-sectoral criteria in Annex A):

- Do regular planning, budgetary and audit exercises reflect EPI priorities?
- Are environmental responsibilities reflected in the internal management regime?
- Is there a strategic department/unit/committee in charge of coordinating and guiding EPI across sectors?
- Are there mechanisms to ensure environment/sector coordination and communication, i.e. between departments and between levels of governance?

Using these questions to frame the analysis, this report reviews the extent to which administrations in Europe are taking EPI on board in their day-to-day working practices. Different approaches and examples of good practice are highlighted throughout the text; key lessons and implications for future work are presented in the concluding section. The report builds on the more general overview provided by the EEA on environmental integration in Europe (2005).

Progress in relation to each of the four questions varies considerably between countries, partly reflecting whether approaches are fully implemented. Specific national administrative cultures, traditions and management trends have implications for EPI. The challenge of getting administrations to work in a way that supports EPI is therefore greater and probably more urgent in some countries than in others.

2 EPI and the role of administrations

2.1 EPI: The challenge for governments

The way governments function, and particularly their ‘compartmentalisation’, has long been identified as a key factor inhibiting EPI. In 1987, the Brundtland Report noted the tendency for institutions to be ‘independent, fragmented, and working to relatively narrow mandates with closed decision processes.’ A less fragmented, more coherent institutional set up should contribute to environmental issues and information being taken more fully into account throughout the policy cycle, from policy preparation and decision-making, through to implementation, monitoring and communication. While some level of compartmentalisation in government is inevitable and even desirable, the extent of fragmentation can be minimised and managed.

The construction of governments — including both the political and administrative levels — along sectoral lines has been no accident. The clear demarcation of policies and competencies between departments was seen in the EU and elsewhere as a way of specialising, thereby ensuring greater focus and efficiency in government operations. Departments and agencies were able to perform a set of distinct operational tasks, accumulating specific knowledge and expertise in their respective policy fields, and establishing contacts and constituencies in these narrow areas. The emergence of new strategic management initiatives places even greater emphasis on the delivery of discrete policy objectives.

Despite the benefits offered, this somewhat artificial division of work has become increasingly inappropriate, given the

growth in governments and policies and the increasingly complex world within which they operate. Solving the most testing environmental problems, for example climate change and biodiversity conservation, demands simultaneous and coordinated responses from many different quarters. EPI has thus been described as a ‘wicked problem’, not least because of the need to reconcile competing values involving a multiplicity of actors operating in many sectors (Jordan *et al.*, 2005). The scale of the challenge is more likely to increase than to diminish.

2.2 Coordinating for good governance

EPI requires environmental issues to be taken on board in the work of all government departments. This requires that increased attention be given to environmental concerns, and that departments work in a less fragmented, and more coherent and coordinated way.

The problem of institutional fragmentation is not just an environmental one, but a major challenge facing governments more widely, particularly encompassing issues such as poverty and education. At worst, fragmentation undermines the delivery of competing policy areas or objectives, frequently to the detriment of relatively ‘weaker’ objectives that relate to social or environmental issues; at best it represents a less than optimal use of public resources. Within administrations, incoherent or incompatible policies generate conflict, with energy spent on defending territories rather than seeking mutual solutions. Policy coherence is also good for public support — incoherent and inefficient government does not win votes.

Efforts to improve the way governments work for EPI should therefore be seen in a broader context of policy coherence and coordination. Studies of how administrations are coping with EPI are already generating practices and lessons that inform broader good governance and better regulation. Conversely, there is scope for those pursuing EPI to learn from other areas of policy where greater coherence is also being sought, such as health. But improved coordination and coherence alone does not guarantee any specific environmental outcome. The opposite can be true: rigorous administrative coordination mechanisms can dilute environmental interests, leading to a sort of reverse integration. Experience with the EU REACH chemicals proposal demonstrates the potential for this in the European Commission, with those working on competitiveness issues seeking to promote this agenda in other Directorates General (DGs), including DG Environment.

More generally, it is important to recognise the limitations of coordination. Over-rigorous coordination can actually stifle innovation and creativity in terms of policy design and effectiveness by forcing

departments to follow a closely prescribed route. At the same time, it is misleading to suggest that better coordination will resolve all issues associated with EPI. Some policy dilemmas — notably those involving incompatible goals — cannot simply be ‘coordinated away’ but demand choices to be made by politicians and the public.

2.3 Administrations, governments and parliaments

The focus of this paper is on *administrative* culture and practices, which has been identified by the EEA as a key area for evaluating progress in EPI. The exclusive focus on administrations is intentional: they serve an important function in relation to EPI, because of their role in policy formulation (shaping decisions subsequently taken by parliaments) and because of their responsibility for implementing and executing policy decisions where they have discretion in programming, monitoring, etc. It would be naïve, however, to think that EPI can be delivered just by designing perfect administrations.

Box 2: The roles of governments, parliaments and administrations

Administrations can be distinguished from ‘Governments’ and ‘parliaments’, even if the boundaries between these are rarely clear cut:

National parliaments are political organs, whose primary role is to elect Governments, legitimise executive decisions and adopt legislation, and represent the electorate. Their role is, however, sometimes weakened by legislative frameworks, which give primacy to the executive.

Governments consist of ministers politically elected, who decide policy. Depending on the specific arrangements of individual states, Governments will include the President, Prime Minister or equivalent head of state or government, supported, more or less, by a cabinet of ministers.

Administrations are basically the machinery of government. Alternatively referred to as civil services or bureaucracies, they basically serve to support the Government in its executive tasks, operating in an a-political manner. This is in theory; in practice, in some countries, senior civil service appointments are highly politicised and dependent on the majority in Government.

In several European countries, national governments have in certain areas to give way to regional or state governments. The interrelationship with national levels is variable, although it is not uncommon for devolved regions to be represented in one national chamber in a bicameral system, broadly comparable to the EU Council where Member State Governments are represented. One critical implication is that even 'national' (and EU) policy-making frequently involves multiple levels of governance, and therefore also multi-level coordination.

At the EU level, rather unique arrangements are in place. The division between political and administrative is particularly blurred,

with political decisions taken by the Council of 25 Ministers, in many cases jointly with the 732 directly elected European Parliamentarians, and almost always on the basis of proposals from the Commission. The College of 25 Commissioners is also a political body, with individuals chosen by the Member States and confirmed by Parliament. The Commission is vested with the right to initiate Community legislation, as well as executing aspects of it and overseeing implementation of all of it. Each of these institutions is essentially a political grouping that takes decisions, and whose work is supported by administrations. That said, the main administration is provided by the Commission's 24 services and DGs.

3 Making the environment a cross-departmental issue

The administrative challenge for EPI is to move away from a culture of fragmentation and ‘policy silos’ and make departments less single-minded and more receptive to environmental issues. Unintended negative consequences of sectoral action should be addressed. Departments should also be able to help, proactively, with the delivery of each others’ objectives wherever possible. The overall ambition is to strengthen the contribution of whole administrations to environmental protection and sustainable development, and to do so in a way that ensures cost-effective action without suppressing innovation.

3.1 Combining different approaches to EPI

Top-down approaches essentially aim to embed environmental issues at the highest levels in government — within the constitutional framework, subsequent legislation or softer political commitments — and then provide the necessary incentives for the whole organisation to follow suit. Changes can thus be secured by rules and rewards to ensure that high-level political commitments trickle down through administrative hierarchies, and manifest themselves in the internal practices and cultures of organisations. For example, departmental spending plans or career development can be linked to the delivery of cross-cutting objectives. As a rule of thumb, the stronger the signals from the top, and the more mechanisms are put in place to convey these throughout governments and administrations, the greater the likelihood of environmental issues being internalised at all levels.

A pure ‘top-down’ approach assumes that people know what the environmental objectives are and how to deliver them, that they recognise the need to do so, and that they have sufficiently strong incentives to integrate even if this detracts from their core

tasks and interests (Peters, 1998). Additional **bottom-up** approaches are thus normally needed to ensure that departments are encouraged, guided and supported in their efforts to take environmental issues on board. Informal communication, in-house training, guidance and the exchange of good practice can all be helpful here, as can rules or procedures, committees and task forces. Such bottom-up efforts are also seen to be important as a means of instilling feelings of ownership and buy-in, with departments or actors persuaded of the value of EPI, rather than simply told about it.

Bottom-up and top-down activities have their strengths and weaknesses, but are potentially mutually supportive, together contributing to a gradual process of cultural change. The opening of political windows of opportunity can be important for both top-down and bottom-up processes, pushing political actors from established positions and ‘creating’ a political will to act, and generating awareness among the public and administrators. Administrative reforms offer the potential of pushing forward medium-term reforms or enabling actors to exploit opportunities once they arise.

3.2 Administrative culture and practices for EPI — EEA evaluation checklist

There are many ways in which administrations can be influenced and changed in favour of EPI. These include instruments or tools that support coordination, as well as changes to the institutional set up. From a top-down perspective, these include regular planning and management exercises, and the introduction of strategic departments to coordinate activities. The introduction of suitable management regimes within individual departments and coordination mechanisms between departments are obvious bottom-up approaches. This

combination of bottom-up and top-down is reflected in the EEA EPI evaluation framework which seeks answers to the following questions with a view to evaluating administrative culture and practices (EEA, 2005):

Do regular planning, budgetary and audit exercises reflect EPI priorities?

If there are pressures on a department's time and resources, and EPI is not considered to be the most essential part of a department's work, then it is likely to be downgraded, paid lip-service to or overlooked entirely. An administration's internal management planning and budgetary mechanisms can be used as a top-down tool to promote cross-cutting objectives, including environmental objectives.

Are environmental responsibilities reflected in internal management regimes?

Adjusting institutional structures and allocating responsibilities, staff and financial resources of individual ministries are bottom-up ways of ensuring that the institutional set-up is appropriate for EPI. This includes allocating responsibility at all appropriate levels, securing environmental expertise within sectoral departments, or other means of building capacity and expertise. It is also important that sectoral expertise and capacity are present in environment departments. There is an option of restructuring governments, for example, by creating environment units or even reorganising existing ministries so that they are more focused on issues, such as rural development rather than agriculture.

Is there a strategic department/unit/committee in charge of coordinating and guiding EPI across sectors?

It is equally important for EPI to be overseen and receive support from strategic or similar units, endorsed at the highest levels. This can be done using top-down institutional arrangements, for example setting up inter-ministry groups (ad hoc or permanent), commissions, task forces or working groups,

which involve all relevant actors (including from outside government). Such bodies can also usefully be linked to political actors, acting as a conductor between the political and administrative levels of government. They should address the multi-level nature of governance, as appropriate.

Are there mechanisms to ensure environment/sector coordination and communication, i.e. between departments and between levels of governance?

Bottom-up instruments or tools can range from proactive formal or informal exchange of information, where communication and coordination takes place early on in policy process, and decisions are based on inter-ministerial agreement, to information being provided only on a 'need to know' basis, in order to ensure basic coherence and to avoid overt conflicts. Cross-cutting teams or working groups can support such coordination and communication (Boyle 1999). Such mechanisms do not of course ensure that environmental issues are given greater prominence, but should ensure that work is at least do not undermine each other. Instruments or tools are also needed to support coordination and communication between different levels of administrations involved in the policy cycle.

There is clearly a range of ways in which to respond positively to these four EPI question, depending on the complexity of the problem (Boyle, 1999) and the needs or specificities of the administration being assessed (see below). Moreover, some responses will be stronger than others, which may mean that several different measures have been introduced, and that these are suitable and rigorous in their design and implementation. As a general rule, the more difficult the coordination problems, the greater and more sophisticated and arguably also more top-down the coordination efforts needed to address them. As reflected in the next section, the choice of coordination efforts will also need to reflect the particular management culture and styles of the country in question.

Table 1 Administrative culture and practices – examples of weak, medium and strong efforts for EPI

Administrative culture and practices – questions for EPI evaluation	Example of weak EPI	Example of medium EPI	Example of strong EPI
Do regular planning, budgetary and auditing exercises reflect EPI priorities?	Environmental objectives are set out in the planning processes, but only in general terms and not linked to specific sectors.	Environmental objectives are set out in the planning processes. Specific sectoral contributions are also identified.	Environmental objectives are set out in the planning processes. Specific sectoral contributions are also identified. Budgetary allocations are made conditional on setting and delivering environmental objectives.
Are environmental responsibilities reflected in internal management regimes?	Responsibility for EPI is made explicit within sectoral departments.	Overall responsibility for EPI is assigned to the PM and/or PM's office. Operational responsibility is assigned to other appropriate levels.	Overall responsibility for EPI is assigned to the PM and/or office. Operational responsibility is assigned to other appropriate levels. Human and financial resources are allocated to EPI.
Is there a strategic department/unit/committee in charge of coordinating and guiding EPI across sectors?	EPI is overseen by a unit/department in the Environment Ministry.	EPI is overseen by a strategic unit situated in the cabinet or executive office. An environmental advisory council is established.	EPI is overseen by a strategic unit situated in the cabinet or executive office. The unit has a permanent staff and budget, and proactively guides and supports work on EPI. The advisory council meets regularly, and is listened to by the Government.
Are there mechanisms to ensure environment/sector coordination and communication, i.e. between departments and between levels of governance?	Communication between departments is on 'need to know' basis. Coordination to avoid explicit conflicts. Ad hoc communication and coordination with other levels of governance.	Proactive and timely information exchange. Coordination to take on board different views. Mechanisms for communication and coordination with some levels of governance.	Proactive and timely information exchange. Collegiate decisions on departmental policies. Systematic coordination and communication with higher and lower governance levels.

4 The context for changing administrative culture and practice

4.1 Differences in administrative cultures and traditions

There are often large differences between national and sometimes also regional administrative cultures and management styles. These differences need to be considered when assessing progress towards EPI and searching for suitable ways forward. Public management styles in Europe can be broadly grouped as: southern European, German-speaking, Anglo-Saxon and Nordic (including the Netherlands). The Nordic countries and the Netherlands are considered to embody hybrid styles (Torres and Pina, 2004). In addition, there can be said to be a system of control/planning in the administrations of the countries of central and eastern Europe.

So-called *southern European* countries, here including France, Italy, Portugal, Spain and Belgium, are influenced by structures inherited from the French legal model built around administrative law and the ideals of 'due process' and 'equality of treatment'. This system is also referred to as 'Napoleonic' (Gyomarch, 1999). In this model, the institutionalisation of administrative law has resulted in a clear separation of political decision-making from administrative implementation and an emphasis on formal rules and organisational structure (Capano, 2003). The Napoleonic model is relatively legalistic and hierarchical. A key feature distinguishing it from the German-speaking model is the reliance on technical expertise within administrations, something which can work against EPI if it is used to prevent interference or 'meddling' from other interests.

Administrative practice in the *German-speaking* countries (Austria, Germany and Switzerland) is marked by a more dominant, overriding legalistic philosophy (Rechtsstaat) with constitutional protection

for tiers of government and civil servants, and giving judicial bodies an important role in circumscribing administrative practice (Hammerschmid and Meyer, 2003). Public administrations are there to apply the law rather than make policy, with comparatively little flexibility and discretion when implementing legal provisions (Knill, 1998). With regard to EPI, although lawyers may not be trained to 'negotiate' solutions across sectoral boundaries, they may be more likely to observe the law, including cross-cutting legal requirements such as those relating to environmental integration.

Within the *Anglo-Saxon* tradition (notably the UK), the role and position of the civil service is more subordinate than in the German-speaking countries. This does not mean that the civil service is unimportant in government policy-making, but it is not assigned a constitutional role, and tends to be subject to structural changes produced by the government of the day. The limited constitutional, legal and structural entrenchment reflects the conception of the administration as a flexible system which is subordinate and instrumental to political requirements and priorities (Knill, 1999). Despite close cooperation between political leaders and civil servants, the separation of politics and administration is prominent in the *Anglo-Saxon* governance tradition, and issues of politicisation or possible bureaucratic dominance of public policy have been the most salient. The British civil service is to a large extent based on a business-like management approach and is often staffed by generalists, who have the ability to move across the system, which increases opportunities for policy learning and cross-fertilisation, and increasing possibilities for furthering policy coordination.

The *Nordic* countries (Denmark, Finland, Iceland, Norway and Sweden), plus the Netherlands belong to a public

administration model which can be described as consensual considering the tradition of negotiation and consultation (Torres, 2004). The civil services are characterised by relative homogeneity and equality, which has created a strong administrative culture based on close attention to political decision premises, and to professional considerations. This combination, which has changed relatively little over time, has fostered a great deal of public and political legitimacy in the civil service. A growing administrative specialisation has contributed to fragmentation in terms of tasks and values, but there have been relatively few conflicts in the system, mainly as a result of commonly-held cultural norms and values (Christensen, 1997). A potential disadvantage is the tendency towards stability and the lack of innovation this might entail. Another potential disadvantage is the lack of movement within administrations, for example in Norway (Peters, 1998).

Attempts by the countries of *central and eastern Europe* to adapt to more democratic forms of management, following the break-up of the former Soviet Union, have resulted in the emergence of another style of administration. Rather than relying on individual initiative, bureaucratic hierarchies and/or laws, administrations rely more heavily on external controls (Peters, 2000). Political and strategic decisions are taken within the party structure, not within the administrative structure. While reforms are under way, there is still a lack of cohesiveness and horizontal coordination within governments. This problem is also caused by a lack of vertical delegation, i.e. a lack of defined roles and mandates for officials within a ministry, which is partly a matter of mistrust (Synnerstrom, date unknown).

Within these groupings, the Nordic, German-speaking and Anglo-Saxon countries are frequently grouped among Europe's environmental leaders (see Liefferink & Andersen 1998). Even among countries where the environment has a relatively high political priority and which share similar management styles, the

approach to environmental policy and EPI can differ significantly. National regulatory styles can influence the general strategy for environmental reform that a country selects and may result in the use of a more operational and institutional approach to strategy development, but there is nothing to prevent a country that normally follows one administrative style from adopting environmental strategies more typical of another (Mol, 1999). Nevertheless, the most effective solutions are likely to be those that reflect national specificities. For example, in the more pragmatic Anglo-Saxon culture, where organisational coordination is not the central problem, explicit but 'soft' guidance and high-level political leadership may be the key to progress; in heavily rule-based countries, top-down legal provisions may be preferable to softer bottom-up or consensual approaches that may take a long time to penetrate departments, because of the hierarchical nature of the systems and the dominance of legalistic cultures.

4.2 EPI and 'New Public Management': Opportunity or challenge?

In examining the extent to which administrations have internalised EPI issues, it is worth noting the public administration reforms introduced in most countries during the past 20 years. These aim at securing 'New Public Management' (NPM), which involves an increased focus on budgetary restraint and cuts, separation of politics from administration, decentralisation of policy delivery, performance measurement and strategic planning (Gruening, 1998).

Although said to be a worldwide phenomenon, the extent to which it has been taken up differs considerably (Lane, 2000). The Anglo-Saxon tradition has been more receptive to NPM reforms, compared with tradition in the German-speaking countries (Knill, 1999). Overall, the role of NPM in the EU has been modest, although NPM traits are now visible in the European Commission's internal management systems. There is also a common European assessment framework (CAF), which defines a number of shared European criteria

such as leadership, strategy and planning, partnerships and resources, which should be taken into consideration when seeking to achieve administrative improvements (EIPA, 2002).

Despite its limited uptake in Europe, the general trend in the direction of NPM could prove to be important in the context of EPI. On the one hand, the emphasis on, for example, strategy and planning, and effective delivery of agreed objectives, could be exploited in favour of

EPI. On the other hand, it is argued that by evaluating public service delivery on the basis of individual and departmental performance, the incentive to cooperate with other programmes in the interests of governments as a whole may be weakened (Peters, 1998). NPM reforms may thus create public management systems that are less well-equipped to adopt whole-government methods of policy formulation and implementation, reinforcing rather than diminishing the need for coordination.

5 Reviewing progress in Europe

Despite the various administrative styles and challenges that face EPI in Europe, the existence of a good deal of environmental legislation and policies in many countries, as well as high-level endorsement of sustainable development strategies, provides a strong basis for strengthening administrative culture and practices for EPI.

Progress in getting administrations to adjust to the needs of EPI has been reviewed using the proposed EEA evaluation checklist to structure the analysis. The information and analysis relates to the EU-25, candidate and applicant countries, EECA and EFTA countries (see Box 3), with examples also drawn from non-European countries. The aim is to provide information on EPI practices that allows at least preliminary comparisons to be made between countries.

5.1 Do regular planning, budgetary and audit exercises reflect EPI priorities?

Countries are only just beginning to explore the potential role of regular planning, budgetary and auditing processes in promoting EPI across administrations. Some examples are emerging, for example in the Netherlands, Norway and the UK. However not all efforts have been entirely successful. Even these few countries face considerable challenges in terms of making strategic planning and budgeting really work for EPI.

5.1.1 Regular planning and budgetary processes for EPI

Planning and expenditure priorities in Europe are established in many different ways, but the process tends to be led through bilateral negotiations between departments and the central finance ministry or, increasingly, through a more centrally-steered process that seeks to establish an overall budgetary ceiling based on the spending requirements of strategic policy priorities, or through a combination of these two. Whatever the process employed, budgetary planning in particular is highly political, in terms of both the overall level of spending and its allocation between departments.

In the EU-25 and the candidate countries, there has been some exploration of the potential for linking EPI efforts with regular planning and budgetary processes, as is done in the Netherlands and the UK. Even in these cases, UK experience suggests that further work will be needed if EPI is to be fully reflected in biannual budgeting and planning (see insert). Other EU countries (Ireland and Luxembourg) have identified the possibility of incorporating environmental considerations into such processes, but it appears that good intentions have not yet borne fruit. In Ireland, the Government's Strategic Management Initiative was, according to the Irish National Sustainable Development Strategy (NSDS), to play a role in delivering

Box 3: Countries and country groupings included in the review

EU-15: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden, United Kingdom

EU-10: Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia, Slovenia

Candidate countries/applicant countries: Bulgaria, Romania, Turkey, Croatia, Former Yugoslav Republic of Macedonia (FYROM)

EECCA (Eastern Europe, the Caucasus and Central Asia): Belarus, Moldova, Russia, Ukraine

EFTA (European Free Trade Area): Norway, Switzerland and Iceland

that strategy (although not EPI as such), but this does not appear to have happened.

Developments in other EU countries are also noteworthy. In Denmark, despite a relatively early and promising link being made between budgets and the environment, this practice ceased following a change of government in 2001. Sweden, a Nordic country with strong political support for EPI, demonstrates the potential difficulties associated with new public management, in this case 'Objective Based Management' (see Section 5.1.3).

Outside the EU-25, the only evidence for explicit promotion of EPI through planning and budgetary processes is from Norway. Evidence of EPI being promoted in similar

ways in EECCA countries is difficult to identify and is thought to be limited.

At the EU level, some efforts were made in the 1990s, by the European Parliament and selected Commission departments, to use the budgetary process to integrate environmental considerations into key policy areas, notably regional development. One consequence was that provisions were inserted into the EU budget, making expenditure conditional on certain requirements being met. In addition to budgeting, the new multi-annual strategic policy planning processes introduced for both the Commission and Council offer significant potential to strengthen EPI at the EU level.

Box 4: Using budgetary planning processes to promote EPI

In the **Netherlands**, each government department, when preparing financial statements for the coming year, had to explain how it will take account of the different dimensions of sustainable development in preparing and implementing policy. This was a requirement for one year only and has since been abolished. The Netherlands has also introduced a budgeting and management approach focused on outcomes and output which involves all government agencies. As part of that reform, agencies will be evaluated every 3–4 years on a recurring basis, in addition to annual reporting of performance. These evaluations — used to integrate sustainable development (rather than EPI) criteria — could expand the scope of sustainable practices in government.

In **Norway**, all ministries must assess the expected environmental implications of their policy proposals and state these in their budgets. The Ministry of the Environment must be consulted in these preparations. The state budget also specifically addresses the environment through a chapter listing the environmentally-relevant expenditures of all ministries. The problem (as identified in the OECD 2001 Performance Review) seems to be that the precise nature of the public expenditure has been unclear since 'a considerable portion of environmental expenditure may actually be compensation for environmental damage'.

The **UK** Treasury biennial Spending Reviews set fixed three-year Departmental Expenditure Limits and, through Public Service Agreements (PSA), define the key improvements to be made using these resources. Successive Spending Reviews have targeted resources on the Government's priorities and have set ambitious targets for improvements in key public services. The 2004 Spending Review set new spending plans for 2006–2007 and 2007–2008. Departmental work programmes have to set out how and in which particular areas the three pillars of sustainable development impacts — social, environmental and economic — would need to be considered by the department in defining its priorities and developing proposals for inclusion in the departmental submission. These are then assessed to ensure that sustainable development principles underpin the spending review outcomes in terms of both the spending commitments made and the PSA targets set.

According to an evaluation of the process (SD Task Force, 2004), having sustainable development as a cross-cutting theme in spending reviews has been a necessary but not sufficient step towards integrating sustainable development more effectively into the UK Government's decision making. More work is needed if it is to continue to work as a cross-cutting theme in spending reviews. Solutions include cross-cutting PSAs, shared PSAs and changes to budgetary arrangements.

Box 5: EPI in the EU's budgetary mechanisms

In terms of commitments, the EU's preliminary draft budget for 2005 (currently under negotiation between the Council and the European Parliament) amounts to Euro 117.2 thousand million. Human resources account for Euro 29.5 thousand million, or 25 % of the total.

Although spending departments in some Member States have been required to justify their annual bids in terms of how their proposed spending will contribute to sustainable development priorities, this has not been the case within the Commission. The annual Preliminary Draft Budget is drawn up in the framework of the Commission's Annual Policy Strategy (APS) and a Budget Circular drafted by DG Budget intended to reflect the strategic policy priorities in the APS. Taking forward the EU SDS or EPI has so far not featured explicitly in these documents. Since negotiations between DG Budget and individual spending DGs will use the Budgets Circular as a point of departure, environmental conditionality has not been applied — although in theory it could be, if EPI were reflected in the Commission's higher-level strategies. Similarly, the ex-post evaluation of past EU spending does not systematically include an assessment of its impact on the environment. The Secretariat-General has completed a thematic evaluation of the contribution of a range of EU policies to sustainable development, and it is possible that DGs will be recommended to give more attention to environmental impacts in their ex-post evaluations.

The practice of 'external conditionality' — where EU funding for Member States is made dependent on their full compliance with EU legislation or other conditions — has grown in recent years. However, its use is still limited. There are other mechanisms and procedures to enable the Commission to influence decentralised EU spending, including EU and national strategic programming, transparency and stakeholder participation, monitoring and control mechanisms, financial incentive systems, regular reporting and ex-ante, mid-term and ex-post evaluation. These have normally been introduced for reasons other than EPI, but like the Commission's strategic budgeting, they offer opportunities for ensuring greater environmental conditionality.

The potential to strengthen the role of strategic processes for EPI will depend on each country's approach to management and budgeting, with the greatest scope clearly provided in the countries that place greatest emphasis on strategic management initiatives, including new public management (NPM). This also appears to be reflected in practice, with the Netherlands, Norway and the UK also ranking amongst those most affected by the NPM agenda.

While a shift towards NPM could be seen as favourable to EPI, NPM is not only an opportunity but also a potential threat to EPI, as Sweden's experience suggests. The more rigorous the strategic management initiative, the more difficult it may be for environmental or other horizontal objectives to be 'added on' subsequently.

5.1.2 Auditing performance in relation to EPI

Countries normally have auditing systems or institutions, although these are usually limited to evaluating the implementation of specific laws or budgets. In practice this means that audit systems will often be of

use to EPI only if legislation and budgets include specific environmental integration provisions.

An exception is the UK's Environmental Audit Committee (EAC) which was established in November 1997 to consider the contribution of policies and programmes of all government departments and non-departmental public bodies to environmental protection and sustainable development; and to audit performance against targets set by Ministers. The Committee undertakes annual reviews of the environmental implications of the UK Treasury's spending plans, both *ex-ante* and *ex-post*. It consists of fifteen backbench Members of Parliament and the Minister for the Environment (in practice *ex-officio* and non-attending). Apart from reviewing budget planning and implementation, the EAC has examined the Government's performance in integrating environmental considerations into government machinery, individual policies (climate change, energy, GMOs) and multilateral negotiations (at the EU, OECD and WTO). Strictly speaking, however, the EAC is not an administrative body, but a political one.

In Canada, the Commissioner of the Environment and Sustainable Development (CESD) is situated in the Office of the Auditor General and plays a significant role in advancing the sustainable development agenda. The CESD audits the government's overall performance on the environment and sustainable development as well as the commitments included in departmental strategies, and reports to Parliament on overall progress towards stated objectives. The findings of the Commissioner's report have often led to direct responses by departments and agencies, and the recommendations have been influential in determining the content and rigour of each round of sustainable development strategies.

The ability to enforce EPI conditions that have been set depends on the availability of adequate resources at the Member State and Commission level. 'Deconcentrated' spending — such as that by the European Investment Bank — is likely to grow in future with the establishment of a new wave of regulatory EU agencies. A stronger evaluation culture could be developed within the Commission, so that more evaluations are undertaken and used in the Commission's annual budget process. The Commission has started systematic ex-post evaluation of policies as part of its shift towards activity-based management and budgeting, although it is too soon to establish whether this will be to the benefit of EPI.

The EU has a Court of Auditors which produces about 15 reports each year. Most focus on aspects of major EU spending, as the Court is obliged to have regard to the cost-effectiveness of undertaking particular investigations. Partly as a result, very few reports have focused on the environment or EPI. Exceptions include reports on the environmental dimension of expenditure under the Cohesion Fund, the Common Agricultural Policy and the ISPA and PHARE instruments. In addition, the European Parliament's Budgetary Control Committee ('COCOBU') — like the UK's EAC not an administrative body — is responsible for reviewing the Commission's spending in previous years, and giving a formal 'discharge' to the EU's budget.

Although part of its formal remit is to review the cost-effectiveness of expenditure programmes — an elastic concept — it has interpreted this narrowly, so that its role in practice has been restricted to financial audit.

5.1.3 Case study — Sweden's 'management by objectives' approach

In Sweden, Management By Objectives (MBO) has been on the political agenda since the 1980s, where the governance system was developed by the Ministry of Public Administration and the National Audit Bureau. MBO is best known from private sector management, where it is intended to motivate stronger performance on the part of managers and employees through goal setting, participative decision-making and objective evaluation. Within the Swedish public sector, MBO is seen as a way for parliament and the government to keep a check on agencies by formulating long-term goals and objectives for a certain budget period. Public authorities must then report the results of their activities to the government.

Within the environmental arena, the Swedish government has formulated 15 national Environmental Quality Objectives (EQOs) with over 200 sub-goals and sectoral goals. All these objectives describe the state of the natural and cultural environment that is to be achieved. The introduction of MBO within environmental policy has had several advantages. The previously large number of environmental objectives has been given a clearer structure, and a responsible agency has been identified for each objective or sub-goal. Monitoring, including the use of indicators, has been given a secure foundation. It has also been possible to start a systematic analysis of the relationships between environmental objectives and other welfare objectives of government such as industrial growth, regional development, agricultural and forestry development, and consumer satisfaction.

At the same time, however, introducing MBO into the environmental arena has run into several problems. The environmental goal structure, although more transparent

than before, is criticised for being opaque since some objectives concern emission levels, others the use of natural resources, others states of the environment, and some human health. Another factor is the continuing decentralisation of the Swedish administration, which includes allowing county boards and local authorities to decide and implement their own environmental goals. Local and regional goals may therefore not 'add up' to national EQOs. This means that there is no consistent overall environmental goal structure, which is a problem when trying to identify and analyse the potential conflicts and synergies between the various governmental objectives. Moreover, it can result in weakening the political control over government activities, which makes it more difficult to specify separate objectives for different operations. This can obscure the distinction between the politicians who set objectives and the civil servants who realise them. Unless politicians openly declare which objectives are most important, civil servants at various levels are obliged to deal with conflicts between objectives by deciding whether their own production objectives or environmental objectives should come first (Wandén, 2003).

The conclusion is that MBO has given some impetus to EPI by identifying the environmental objectives and assigning a responsible agency to each of them. However, the fact that all sectoral departments and agencies have to include environmental considerations in their activities does not by itself make the goal structure clear or eliminate conflicts between environmental and other welfare objectives. The Environmental Protection Agency has retained overall responsibility for environmental research and monitoring, but does not have the power to interfere in the decisions of other agencies. A related problem is that environmental objectives are not attached to a budget, as MBO foresees. Sectoral agencies have to fund their environmental work from their own budgets, which do not normally include funds earmarked for environmental purposes (Wandén, 2003). Although several environmental objectives are within reach, more work on environmental coordination (or integration) remains to be done.

5.2 Are environmental responsibilities reflected in internal management regimes?

There are various ways — explicit or implicit — in which EPI can be internalised within management systems. In practice, there is currently no evidence of a systematic embedding of EPI within management systems, apart from the introduction of EMAS or similar approaches that could, potentially, address the allocation of responsibilities, structural arrangements and resources.

5.2.1 *Appropriate allocation of responsibility*

It is difficult to establish whether countries have allocated responsibility for EPI 'appropriately', i.e. across departments and hierarchical levels. The establishment of strategic management bodies (see below) provides some indication of senior management levels being engaged in EPI or sustainable development issues, but the allocation of day-to-day responsibilities is not self-evident in most countries examined.

It is perhaps easier to assess whether EPI is seen to be a sectoral issue at all, or whether, as in the case of EECCA countries, EPI or sustainable development activities are seen for many practical purposes to be the preserve of environment ministries alone. In FYROM, for example, although the development of a sustainable development strategy has wider ministerial involvement, the managerial role of the environment ministry can act as a stimulus for continued action, but can also result in problems of sectoral uptake. A similar situation exists in some of the EU-25 countries, in practice if not in theory. In Malta, for example, the environment is often still viewed as an obligation only of the Malta Environment and Planning Authority and other environmental agencies such as the Malta Resources Agency.

Within the EU institutions, responsibility for EPI has been identified in most Commission DGs and other services. However, responsibility is frequently vested in Heads

of Unit and their staff, with little evidence of more senior officials acting continuously as ‘board room champions’ for EPI. It is not clear whether explicit EPI responsibilities are allocated to sectoral staff in the Council and Parliament secretariats.

5.2.2 *Structural arrangements*

As regards the basic structure of administrations, all the countries covered in this report have a national Ministry or Department that is the main body for handling environmental policy, the only exception being Bosnia-Herzegovina, where competence is at the entity level.

The countries of central and eastern Europe had a history of ‘integrated’ approaches to policy development in that the socialist centrally-planned systems tended to consider different sectoral issues ‘in the round’ as plans were produced and policies developed. However, these generally failed to integrate environmental objectives. The institutions responsible for environmental protection rarely had sufficient status to have any impact on economic sectors, such as industry and agriculture, which had high political priority. Indeed in the early 1990s the establishment of separate Ministries of Environment, where these did not exist, helped to raise the profile of the environment and such ‘separation’ can be seen as the first step towards integration.

Overall, the institutional structure and authority of ‘environmental’ ministries differ considerably between countries, with three main ways of dividing responsibility for different environmental issues between ministries:

- A Ministry of Environment in charge of all environmental affairs (the dominant model in most European countries).
- Environmental responsibilities included within ‘multi-functional’ ministries, the Ministry having responsibility for several policy areas including the environment. For example Austria has a ‘Federal Ministry of Agriculture, Forestry, Environment and Water Management’ and Cyprus a ‘Ministry of Agriculture, Natural Resources and Environment’. Planning responsibilities are most commonly brought together with the environment (for example in Croatia and Slovenia), but other examples include food safety and rural affairs (for example the UK).
- Environmental portfolios split between two or more ministries — in the Netherlands, for example, the Ministry of Agriculture, Nature and Food Quality covers nature management and rural development, and most other issues related to environmental protection are dealt with by the Ministry for Housing, Planning and Environment. In a number of countries, for example FYROM, health ministries are responsible for policies for the protection of drinking and bathing waters.

Federal countries represent a particular challenge for structural integration. Responsibility for environmental administration may be devolved to varying degrees to the sub-national level, whose administrations need environmental departments to ensure implementation and coordination with other relevant authorities. Responsibility for other policy areas may vary. This can, therefore, present a challenge for EPI where there is a variety of national/federal responsibilities for different policy areas.

Box 6: Restructuring environmental ministries

Having a Ministry of the Environment responsible for the full range of environmental affairs may reflect a government's high priority for environmental issues and allow a clear environmental message to be conveyed. Specialised skills and experience with dealing with environment-related issues are often developed in such ministries. However, physical separation from other ministries may make it more difficult to inform sectoral thinking and approaches, due to difficulties in terms of formal and informal coordination and communication. Unless handled carefully, separation can also generate 'turf wars', particularly as environmental issues increasingly impinge on sectoral decisions, and vice versa.

Having the environment as a part of a 'multi-functional' ministry has the advantage that it is easier for environmental issues to be put on the agenda in that particular area (for example urban planning or agricultural policy). Informal and formal communication and coordination can be increased and appreciation of environmental issues improved. This could also be the case if responsibility for the environment is shared between ministries. A disadvantage may be that it inherently limits the scope of environment activities, since the lack of 'independence' may mean that environmental concerns are relegated to second place when there are conflicts with other functions of the 'host' ministry. Also, if responsibility for environmental policy is split between two or more ministries, there may be problems of coordination and cooperation.

5.2.3 *Human and financial resources for EPI*

EPI potentially demands additional and usually different human resources, both in sectoral and environmental departments, although it is difficult to identify the exact level of resources needed.

There is evidence of pressure on human and financial resources, particularly where there are general pressures to reduce overall government expenditure. In Germany, the innovative role of the Federal Chancellery's office in overseeing implementation of the SDS (rather than EPI) appears to be constrained by resources (Swanson *et al.*, 2004).

The ability of environment ministries to cope with sectoral dossiers and negotiations can also be significant in terms of constraining EPI. Many environmental administrations in the EU-10 and candidate countries are 'stretched' with regard to resources (for example for implementation of the EU environmental *acquis*), thus making resources available for EPI may pose potential severe challenges for budgetary allocation.

At the EU level, many Commission departments have dedicated EPI staff, often within environment or sustainable development units. This is partly a reflection of an earlier initiative to create integration correspondents in each department. While

resources have undoubtedly increased in the past five years, there is often scope to further increase the number and expertise of staff to cope with burgeoning EPI-related demands.

Training and capacity-building associated with the Commission's new extended impact assessment procedure could make a significant contribution. The new procedure is expected to result in increased numbers of environmental experts being recruited to sectoral departments, although this may not be enough to compensate for the increase in human resources diverted to impact assessments and related consultation procedures.

5.2.4 *Environmental management systems for EPI*

Although appropriate responsibility for EPI, structural arrangements, and human and financial resources could be introduced separately within ministries and administrations, they could be brought together by a registration under the EU's Environmental Management and Audit System (EMAS) or a similar environmental management system. This is particularly so given the need for EMAS-registered bodies to ensure that their outputs, including policies, gradually improve in environmental terms. However, it cannot be taken for granted that a ministry's internal management system is suitable for EPI purely on the basis of EMAS registration.

In Sweden, the government has introduced management systems for ministries and agencies, now adopted by all ministries and more than 230 agencies. These cover direct environmental impacts (for example of procurement) and indirect impacts resulting from training and funding (OECD 2004).

In Switzerland, the core sectors of the Federal administration (60 federal departments) are charged with implementing an environmental management system called 'Resource and Environmental Management in the Federal Administration' (RUMBA) in accordance with the Federal Council resolution of 15 March 1999. RUMBA requires assessments of the direct and indirect environmental impacts of offices, office equipment and official journeys in each organisational unit, the aim being to achieve a steady reduction in such impacts. The procedure is also applied to products, services, ordinances and administrative orders.

So far only three national-level organisations have registered for EMAS. These are the Austrian Federal Ministry of Agriculture, Forestry, Environment and Water Management, the Austrian Federal Environment Agency and the Danish Environmental Protection Agency. However, at the lower (regional) administration level there are many registrations in Italy, Germany, and Austria (EMAS Helpdesk, 2004). Several EU institutions or agencies have also embarked on and/or completed the EMAS certification process.

5.3 Is there a strategic department/unit/committee in charge of coordinating and guiding EPI across sectors?

5.3.1 Strategic bodies coordinating EPI across departments

As set out in Table 2, EU Member States and EFTA countries have in many cases introduced new high-level and cross-cutting departments, units or committees to oversee and promote EPI across the government.

Many of these bodies were in fact created in order to prepare or implement national sustainable development strategies or similar frameworks. These bodies normally involve administrative levels and, in some of the most promising cases, also engage ministers and heads of state or government. Examples include Slovakia's Government Council for sustainable development which brings together the prime minister, other relevant ministers and central bodies, as well as heads of regional authorities and non-governmental actors.

Bodies such as this can act as a powerful conduit between the political and administrative layers of government. Despite the number of bodies now in place and their potential, it is not always evident that they have meaningful high-level engagement or play a strategic role in pushing forward EPI. Instead, the role of these bodies is frequently to follow or report in a rather neutral way. They also tend to be focused on sustainable development issues, rather than EPI.

Of the countries covered by this report, the UK has the most 'built-up' set of SD-specific units or bodies, some of which focus on coordination within the administration. A cross-government SD unit is located in the Department for Environment, Food and Rural Affairs. It promotes the SD strategy, providing guidance and an integrated policy appraisal tool. There is also an SD Task Force which includes ministers and is chaired by the Secretary of State for the Environment, which reviews the SDS. In addition, a Cabinet sub-committee considers the impact of policies on SD and ways of improving performance of departments in contributing to SD. The sub-committee is made up of 19 Ministers appointed from every Government Department (16 Central Departments plus 3 from the Scottish, Welsh and Northern Ireland Offices) and chaired by the Environment Minister. According to the OECD (2002), despite these mechanisms, work remains to be done to achieve the integration of sustainability concerns into policy, especially beyond the central government level.

In most cases, the focus of these high level bodies is on SD rather than EPI. In the UK, apart from the UK Parliamentary Environmental Audit Committee that assesses the Government's performance in integrating environment into policies and decision-making, the focus is on SD. Germany's so-called 'Green Cabinet' is also focused on SD issues.

In contrast to national developments in the EU and EFTA, EU-level progress in this area is relatively limited. The General Affairs and External Relations Council has been given a coordination role for the EU Cardiff integration process but this has consisted of little more than the development of a road-map setting out relevant policy issues where the environment is relevant. There is no cross-sectoral Council group that oversees work. Within the Commission, a unit in DG Environment has acted as a driver for EPI, boosted by ad hoc initiatives of sympathetic six-monthly Council Presidencies. None of these bodies has provided active guidance or support for EPI, although DG Environment is considering options for doing so (European Commission, 2004).

The EECCA countries show little evidence of dedicated units being established to oversee and guide EPI, with this work being left to environment ministries. Where SDSs have been identified there is wider governmental engagement in overseeing implementation. For example, in Belarus the Cabinet oversees the SDS.

5.3.2 *Advisory councils*

In addition to purely strategic bodies, there was a proliferation of environmental and SD advisory councils in Europe during the

1990s, although the earliest initiatives for advisory councils date back to the 1960s and 1970s (Macrory & Niestroy 2004). Typically established by governments to follow-up national sustainable development strategies, they involve a combination of governmental and non-governmental experts.

Membership of the councils varies considerably, some taking the form of stakeholder councils and others acting more as scientific/expert councils (see Annex B). Their main role is to build consensus among the stakeholders and communicate environment/SD issues to the public, whereas the expert councils focus on assessing government policies and making recommendations for new policies. All councils are expected to deliver independent advice to their governments, although some are more independent than others. Their anchor within the national administrations and relationship with heads of state or government is also variable. A recent review suggests that the more expert and independent type of councils are preferable to those which are government-led and more representative (Niestroy, 2004).

The only EU-25 and EFTA countries that do not have EPI or SD advisory councils are Denmark, Greece, Iceland, Italy, Lithuania, the Netherlands, Spain and Switzerland. Most of those that do exist are concerned with SD issues. It is not evident whether similar councils exist in EECCA countries. There is currently no EU-level environmental advisory council.

Table 2 Strategic units or other bodies to guide and support EPI (EU-15, EU and EFTA)

	Strategic unit or body for EPI	Weak, medium or strong EPI
EU-15		
Austria	In 2000, a standing committee of SD (not EPI) coordinators was set up, representing the nine Länder governments and the federal level. This is a policy coordination mechanism. The standing committee's mandate is to support coordination and implementation of SD policies. It is assumed that EPI is ensured through the SD process.	Weak/medium
Belgium	The Interdepartmental Committee for SD (ICSD) is responsible for drafting the Federal Plans for SD, and for coordinating and overseeing its follow-up, using annual reports. The ICSD includes representatives of all the Federal Ministers and Regional Governments, and is headed by the Minister for the Environment, Consumer Affairs and SD. The Task Force for SD supports the preparation of the SD Plan. A new body, the POD-DO, is involved in the preparation of SD policies in the Federal Plan, provides expertise for the Ministerial departments, and coordinates the implementation of the plan. The POD-DO appears to have the most explicit role in terms of guidance and coordination of implementation activities for the SDS. There are national and regional SD Councils.	Weak/medium
Denmark	There is no strategic unit or other governmental body to guide and support EPI. There is no advisory council.	Weak
Finland	The Finnish National Commission for SD is chaired by the PM and co-chaired by the Environment Minister. The Commission includes other ministers, as well as representatives of different sectors of society. A sub-committee guided the 2003 evaluation of the NSDS. This Commission also acts as an advisory council.	Medium/strong
France	The Inter-ministerial Committee for Environment (CIEN) — chaired by the Environment Minister by delegation from the PM, including representatives of all State ministries and secretariats. CIEN adopts programmes relating to integration and examines, notably, coherence of different ministerial actions with environment. There is also an Inter-ministerial committee for SD (CIDD), the Environment and Territorial Development Ministry (MATE) responsible for elaborating the SD strategy and the Inter-ministerial Committee for the management and Development of the Territory (CIADT). A National Commission for SD has also been established, which acts as an advisory council.	Medium
Germany	The State Secretaries' Committee for SD (Green Cabinet) is chaired by the Federal Chancellery. The Green Cabinet is responsible for interdepartmental management of the SD process and regularly reports to the Federal Cabinet. There is a Council for SD, plus advisory councils on environment, global change and land stewardship.	Strong
Greece	EPI and SD activities are led by the Ministry for the Environment, Planning and Public Works. There was an inter-ministerial coordinating committee in which the Ministries for Economics and Finance, Development, Agriculture, Transport and Merchant Marine were represented. This Committee was involved in the NSDS and WSSD preparations. There is no advisory council in Greece.	Weak
Ireland	The Green Network of Government Departments promotes policy coordination and a consistent approach to environmental management across government departments with environmental functions or where policies impact on the environment. The COMHAR is Ireland's equivalent of an advisory council.	Weak

	Strategic unit or body for EPI	Weak, medium or strong EPI
Italy	The Inter-ministerial Committee for Economic Planning (ICEP) identified structures and bodies to ensure monitoring of the implementation of the NSDS, with a Technical Board to the ICEP Commission for SD chaired by the Under-Secretary of the State for the Environment & Territory, and comprising the Under-Secretaries of State for Public Works, Transport, Industry and Energy, and Regional Affairs. ICEP produces annual assessment reports relating to the NSDS. There is no advisory council.	Weak/medium
Luxembourg	The Interdepartmental Commission on SD is responsible for drafting the national SD plan and the national reports. It also acts as the guardian of EPI. The ICSD is composed of representatives from different ministries, as well as inviting experts on an ad hoc basis. The ICSD acts as a coordination body. There is an advisory institution — the Supreme Council for SD.	Medium
Netherlands	An inter-ministerial steering group guided the NSDS development process, under the guidance of the Prime Minister. Several Ministries and NGOs are involved in this and the NEPP. Responsibility for coordinating implementation of the Action Programme lies with the Ministry of Housing Spatial Planning and the Environment. There is a sub-council of the cabinet for environment and spatial issues, which is chaired by the Prime Minister. There is no environmental advisory council.	Medium
Portugal	The 2002 Framework SD Strategy was developed through intergovernmental cooperation, using existing inter-ministerial coordination structures, namely the inter-ministerial Commission for Community Affairs. A special Commission established in the PM's office was responsible for political coordination of the 2002 Framework. There is no specific strategic body now in place to follow and oversee EPI in a general and on an ongoing basis. There is an advisory council.	Weak
Spain	An Inter-ministerial Commission for the Coordination of the NSDS has lead political responsibility for the development of the NSDS. The Commission leads coordination of the 12 Ministry Departments. It has been proposed that after approval of the Spanish NSDS, a Specific Forum for SD be introduced. Coordination is to be supported by a 'Permanent Observatory' consisting of an analysis unit and a variable panel of experts. There is no advisory council.	Weak
Sweden	At the end of 2003, a secretariat was established for SD at the PM's office, with responsibility for SD. There is a Swedish Environmental Advisory Council.	Weak/medium
UK	There is an SD Unit — a cross-government unit located within the Department for Environment, Food and Rural Affairs, and an SD Task Force — including ministers and chaired by the Secretary of State for the Environment, which reviews the SDS. The SD Unit promotes the SD strategy, providing guidance and integrated policy appraisal tool. There is an environmental advisory council — the Royal Commission on Environmental Pollution.	Medium
EU		
	There is no dedicated body to support and guide EPI from a strategic perspective. There is no EU-level advisory council.	Weak

Strategic unit or body for EPI		Weak, medium or strong EPI
EFTA		
Iceland	There is an inter-ministerial committee on sustainable development, led by the Ministry for the Environment, with representatives from the Ministries of Finance, Industry, Agriculture, Transport, Fisheries and Foreign Affairs, and from the Prime Minister's office. In addition, there are inter-ministerial coordinating bodies on climate affairs. There is no advisory council.	Weak/medium
Norway	The National Committee for International Environmental Issues (NCIES) is chaired by the Ministry of Environment, and includes the Office of the PM, a number of ministries, private and non-governmental actors. The NCIES functions as a discussion forum, advisory council and cross-sectoral coordination body. There is also a Committee on Sustainable Development which includes the Association of Local Councils, the Directors General of major trade unions and business associations, and the Norwegian Society for the Conservation of Nature, the country's largest conservation organisation.	Medium/strong
Switzerland	The 2002 SDS was created within the IDARio (Interdepartmental Rio Committee) framework. IDARio is a directorate-level interdepartmental committee. It includes representatives from federal agencies whose mandate is related to sustainable development. It was established to oversee follow-up activities to Rio. There is no advisory council.	Weak/medium

5.3.3 Case study – the Netherlands' approach to EPI and SD

In the Netherlands, there has not been a strong tradition of integrating sustainable development into the policy process. However, the Government is working in other ways to promote SD and EPI. In particular, the 2001 fourth National Environmental Policy Plan (NEP4) introduced the concepts of transitions and transition management, which are being applied to the four major areas of policy: energy, biodiversity, agriculture and mobility (VROM, 2001).

Transition management 'tries to combine long-term envisioning, multi-actor interaction and short-term actions based on innovation' (Loorbach, 2002). In this way the long-term visions function as a framework for formulating short-term objectives and evaluating existing policies. Transition management is a soft approach to planning policy, which aims to achieve structural change gradually, without too much destructive friction in the form of social resistance (Rotmans *et al.*, 2001).

Central to transition management is the generation of public support through stakeholder involvement in the formulation of images and visions (the 'transition arena'), where participants come to a mutual understanding of the transition problem. The transition visions provide the basis for thinking about transition pathways and intermediate goals. The transition process also involves a number of experiments, where new technology is tried out at the local level and new regulations, financial arrangements and cooperation are attempted. In this way transition management is to a large extent influenced by a 'learning-by-doing' approach, which should eventually also include regular monitoring and evaluation (Loorbach, 2002; Rotmans *et al.*, 2000; and Kemp and Loorbach, 2003).

Transition management should result in pro-active strategies with a broad stakeholder ownership which also generate more coherence in public policy. However, while the initial focus may not be on integrating environmental issues within management systems, the success of transition management will depend on administrations actually taking environmental issues on board.

5.4 Are there mechanisms to ensure environment/sector coordination and communication, i.e. between departments and between levels of governance?

5.4.1 Coordination and communication between departments

Coordination and communication between departments can be more or less formal, and involve environment-specific as well as general arrangements or procedures. Assessing the extent or quality of coordination and communication is rather difficult, although some patterns are evident. It is also important to note that coordination and communication is frequently also underpinned not by structures but by action plans, such as Slovakia's Action Plans for Transport and the Environment and for Health and the Environment, impact assessments and external consultation mechanisms.

Ad hoc and issue-specific working groups or commissions are routinely established in many EU countries, for example in Austria, Germany and Portugal, and are increasingly common within the European Commission. A number of countries have also created more permanent EPI coordination or communication networks between public agencies or ministries, focusing specifically on EPI or SD-related issues. For example, in Sweden the Environmental Protection Agency coordinates a network which collects experiences on best practice as well as problems and evaluation issues. Similarly, Finland has a network secretariat within the Ministry of Environment, which has a number of contact persons in other ministries. Ireland also has a green network of government departments.

In Bulgaria a number of measures have been undertaken in recent years to improve inter-institutional cooperation on sustainable development and environmental policy integration at the national level, including:

- cooperation agreements;

- participation of representatives of other ministries in permanent commissions and councils with the Ministry of Environment and Water and vice versa;
- adoption of development programmes and plans by the Council of Ministers in the environmental field specifying the different institutional responsibilities, performance monitoring and reporting.

Environment-specific coordination and communication is normally additional to mainstream consultation exercises invoked during the legislative or policy process. In Norway all government documents must be circulated to all relevant ministries for comment, and issues affecting several ministries are often handled by inter-ministerial committees such as the 'Green Tax Commission'.

At the EU level, the Commission's inter-service consultation procedures require that all departments have an opportunity to comment on all official Commission documents. In practice, while inter-service consultation provides a minimum standard, it can be used in a perfunctory and even obstructive way. Where communication and coordination works relatively well, for example between DG Environment and DG Agriculture, personal relations and informal contacts are noted as being the most critical elements.

Within the Commission and elsewhere, the quality of coordination and communication — general or environment-specific — appears to depend on a combination of administrative styles, cultures and personal relationships. In Norway, among the consensual countries that prioritise environmental issues, much coordination happens informally simply by 'picking up the telephone'. In other countries, relationships and cultures may not be as conducive to EPI. The rotation of civil servants between ministries — common

practice in the UK — can offer a means of strengthening relationships and enhancing coordination and communication. Meaningful communication and coordination is also more likely if all actors see the benefits of EPI.

5.4.2 *Coordination and communication between levels of governance*

Coordination and communication between different levels of governance poses an additional if different set of challenges, particularly for federal countries. In the EU-10 as well as the candidate countries, there is considerable communication upwards. This has been seen through the various coordinating mechanisms either from the environment ministries themselves or through SD Commissions, etc.

At the EU level, the EU's Green Diplomacy Initiative is among the most notable in this regard. This is aimed at promoting the integration of the environment into external relations through the creation of an informal network of environment experts within foreign ministries, the so-called Green Diplomacy Network. The aim is to

improve coherence and synergies among the different EU programmes and stronger coordination between the different bilateral and multilateral levels. The actual impacts/influence of this network is, however, still to be seen, with the first report to be published in 2005.

Communication and coordination downwards varies, with Scandinavian countries considered to be relatively strong in this regard (Niestroy, 2004). Clearly this presents more of a challenge in larger countries such as Poland, which have decentralised decision-making. It is not really an issue in Malta. Such communication is often easier where regional/local decision-making can be part of the structure of an environment ministry (for example the Baltic States) as opposed to separate regional authorities (Spain, Germany, Austria, Czech Republic or Poland). Often the formal method is to include regional bodies in SD (rather than EPI) bodies. Some examples of structures being established in Europe are given below, involving in particular the German-speaking countries.

Box 7: Some examples of coordination and communication structures being established in Europe

Austria has established a standing committee of SD coordinators, representing the nine Länder governments and the federal level. This is a policy coordination mechanism, which also serves as a strategic body to oversee progress in implementing the SDS.

The Bulgarian National Council on Regional Sustainable Development (NCRSD) is an advisory body to the Council of Ministers. The NCRSD includes several other key ministers, the regional governors of the nine administrative regions of Bulgaria and the president of the National association of the municipalities.

Germany has a working group between the federal and Land environment ministries, established in 2001 to exchange experiences in implementing the SDS and coordinate activities. In practice, it appears to serve more of an orientation function, as well as identifying good practice, indicators for SD appraisal, etc.

In Sweden, counties are allowed to formulate their own environmental quality objectives. An Environmental Objectives Council coordinates the regional application of the objectives and informs the Government of progress. Within the Council, there is funding for monitoring and reporting to the international level.

The Swiss Federal Council promotes aspects of EPI and the implementation of the SDS, providing some coordination for the Cantons. However, Cantons are autonomous, so national/local coordination issues have great political sensitivity.

Among the EECCA countries, there are a few examples of downward communication, where national planning involves regions/ local governments. However, a specific system for downward EPI communication is not readily identifiable.

There is much potential for more concerted coordination between EU and national levels on EPI, using benchmarking, peer review and policy learning. The particular benefits of the EU's 'Open Method of Coordination' is receiving particular attention (Jordan *et al.*, in press).

5.4.3 Case study – cross-sectoral coordination in Germany

In Germany, strategic, inter-departmental approaches to policy-making are rather weak and there is generally a lack of horizontal administrative structures and coordination mechanisms to aid the process of EPI, though some key 'horizontal' bodies, most notably the Green Cabinet, have been established. Instead the German approach to EPI has focused more on progress in critical areas, such as climate change, allowing detailed discussions on specifics.

In the field of climate and energy policy, Germany can in some ways be said to be a European front-runner both in terms of cross-sectoral coordination at the national level and vertical involvement from the regional and local levels. The German National Climate Protection Programme was adopted in 2000 and is administrated by the Federal Environmental Ministry. The Programme lists 64 concrete measures for climate protection, which include ecological tax reform and promotion of cogeneration (BMU, 2000). As part of the programme, the new Renewable Energy Sources Act (EEG) entered into force in August 2004, which aims to provide a legal framework for renewables in order to increase their share of total electricity supply (BMU, 2004).

Political commitment to the formulation and implementation of ambitious goals in the

Programme has been at a high level, and it requires all ministries to achieve individual greenhouse gas emission reduction targets. The Federal Government has set up an inter-ministerial working group, which reports to the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety and allocates responsibilities to the relevant ministries (BMU, 2000). There has also been a strong stakeholder involvement in the Programme, with industry committing to voluntary reduction targets, and at the regional and local level more than 500 local communities have developed climate change strategies (OECD, 2001).

Climate change policy in Germany is exceptional in terms of its policy networks, which comprises NGOs, government units/departments, research units/institutes, and interest groups from business, labour unions, foundations, and corporations. While the network is divided in environmental and economic interests, it does not appear fragmented, and data demonstrates that levels of conflict are low and cooperation and information exchange is not divided along conflict lines. Moreover all groups have access to the policy-making process, even though the distribution of resources is not well balanced (Jost and Jacob, 2003).

Despite the potential offered by Germany's issue-oriented approach, climate protection is not a total success story. Expected cutbacks in subsidies for coal mining have been watered down, and a stronger support for co-generation has been successfully blocked by the energy industry (Swanson *et al.*, 2004). This means that the Climate Action programme is a good example of a policy programme which is coordinated across sectors and involves relevant stakeholders but is only integrated in the absence of opposition from vested interests. Another potential down-side of focusing heavily on specific issues is that, while a small number of high-profile issues may benefit, others may be overlooked.

6 Learning from experience

6.1 Key lessons emerging from Europe

Earlier EPI efforts — where they were in evidence — consisted of soft bottom-up approaches, with environment departments/ministries trying to persuade others of the value and importance of EPI. Increasingly this has been complemented by high-level political and/or constitutional commitments that have now been widely articulated and set out, in particular in national sustainable development strategies and environmental action plans. These commitments pave the way for changes in administrative practice and political decisions. In practice, the development of national environmental or SD strategies has been followed by or associated with the creation of new initiatives and/or bodies. It is arguable, however, that the preoccupation with strategies has also deflected attention from tougher decisions, both regarding administrations and actual policy change.

A small but growing body of initiatives is now emerging, however, aimed at getting the relatively strong legal and political commitments to EPI reflected in European administrations. Various mechanisms are being employed in efforts to embed environmental thinking in government departments, activities and mindsets, and in the process also engaging politicians and external stakeholders. Many European countries can demonstrate some attempts to secure improvements in administrative practices in support of EPI, although not surprisingly, the use of different mechanisms is uneven.

In relation to the four questions of the EEA evaluation checklist, the most explicit progress is apparently being made by a small group of EU and EFTA countries, notably some Anglo-Saxon, Nordic (including the Netherlands) and German-speaking countries, as follows.

The lead countries in terms of **strategic planning, budgeting and auditing** are among those that have moved towards new public management approaches that favour budgetary rigour, strategic planning and performance evaluation (UK, Norway, the Netherlands), in support of EPI or SD. The UK stands out, however, for its unique approach to environmental audit (though involving a political body), something that other countries and the European Parliament could learn from. But these are not the only countries moving into the realm of New Public Management and, as Sweden demonstrates, it is both an opportunity and a necessity for EPI to be embedded more widely in strategic processes.

The picture that emerges in relation to EPI being reflected in **internal management systems** is much less clear. Here, it is easier to identify countries that are performing less well, particularly but not only the EECCA countries, where EPI is still regarded as the preserve of environment ministries. As regards structural arrangements for EPI, countries seem to be or are moving towards a situation where environment units exist in sectoral departments, and where the environment is increasingly brought together with other issues to make 'multi-functional' ministries. The implications of this, and the fact that responsibilities for environment and sectoral policies are often distributed unevenly between EU, national and regional levels, deserves further consideration. What is clear is that any structural arrangements can undermine or weaken environmental authorities, and dilute expertise. In this context it is important to note that, in the EU-10 and candidate countries, but also in some EU-15 countries, resources and expertise are being increasingly stretched, something that is not always sufficiently recognised during times of budgetary cut-backs.

The most visible changes that have taken place relate to the setting up of **strategic bodies to promote, guide and support SD and, to a lesser extent, EPI**. These include internal and external advisory bodies. Here, the UK, followed by Germany and Finland stand out as the most promising although it is not always clear what these bodies achieve in practice. Southern countries and the EU are noteworthy for being amongst the 'laggards', with the mismatch between EU commitment and strategic governance arrangements being particularly stark.

The issue of **coordination and communication** between departments and levels of governance is increasingly critical, in relation to both EU and national governance. It is also an area where the state of play and progress are difficult to assess, even if some patterns are apparent. The establishment of ad hoc or issue-specific communication and coordination mechanisms, for example, appears to be quite widespread, including in the German-speaking, southern and central European countries. Permanent networks have also been set up and complement standard consultation mechanisms. However, what is most important and also most difficult to construct rapidly, is *good quality* communication and coordination.

There is still a long way to go before all or most European countries would score highly against all four of the EEA evaluation criteria, with work rather piecemeal and practices apparently not yet firmly institutionalised. Even in countries demonstrating the most overt efforts to support EPI it is sobering to note that existing arrangements appear not to be reaching their full potential, and the impacts of these efforts are not clear cut.

EPI must be a continuing process, not something that is simply 'achieved'. Success depends on a mixture of political commitment, structures, processes and even personalities, so that the challenge is likely to be continuous. Moreover, progress is not always linear. Despite the fact that most countries have experienced general improvements, some countries such as Denmark, which has historically

been an environmental frontrunner, abolished its environmental assessment of the budget after its general elections in 2001. The fact that EPI is an ongoing process also underlines the importance of changing not only current practices but also administrative cultures for EPI, with a view to institutionalising EPI and protecting it from sudden changes, in so far as this does not undermine democratic principles. Administrations ensure that policy goals continue to be respected, long after politicians have moved onto other issues, which is all the more problematic for challenges like EPI which generally have a low political profile over the longer term.

In drawing lessons from the analysis, two important points should be noted:

- The most obvious developments covered in this report are those explicitly labelled as 'EPI' initiatives, which are frequently also the most top-down in nature. The result is that progress in countries where EPI has been less of an explicit policy, and where bottom-up initiatives are used to secure integration, may be relatively poorly reflected. This has important implications, particularly for the countries whose administrative cultures and traditions may better suit bottom-up approaches.cooperation agreements.
- For the developments that are most explicit, both in terms of institution building and the introduction of instruments or tools for improving coordination, most are concerned with SD rather than EPI. SD cannot be achieved without EPI, but the two are fundamentally different. In practice, a focus on the more nebulous concept of SD may be insufficient to ensure that environmentally issues are fully reflected in policies.

6.2 Challenges for future evaluation of EPI

The fundamental challenge for the evaluation of EPI is assessment of both the existence of EPI arrangements and their outcomes, that is whether particular administrative bureaucratic procedures are effective in supporting EPI at the policy development and policy implementation levels. The mere existence of mechanisms is clearly not indicative of their effectiveness. Without knowing the effectiveness of a particular mechanism, it is difficult to define suitable combinations of EPI mechanisms. In terms of applying the EPI evaluation framework criteria, a number of points emerge that require further consideration, before the criteria can be applied more widely to evaluate effectiveness.

At a basic level, there is a need for accessible information to support the use of the evaluation framework, particularly as regards the quality of structures, processes or other EPI-related developments and their impacts. There is information on administrative culture and practices for EPI, but this tends to focus on developments in a relatively small number of countries and/or a small number of issues, and on SD rather than EPI. The information used in this report has been complemented by interviews with and short questionnaires completed by some national officials, which has allowed more concrete measures to be identified and/or confirmed, but these have been of limited use in supporting additional qualitative analysis. The limited resources available for preparing this report have been a major constraint.

Box 8: Information on administrative practices for EPI

The literature used in this report can be divided into three main categories — country or EU/OECD-wide reports on environmental performance, issue-specific evaluation reports and other 'independent' reports on environmental policy integration, governance and administrative culture. While together these provide a rich source of information, only a few include in-depth information relevant to (though insufficient for) the four evaluation criteria. The reports also cover a sub-set of countries and sectors.

Country, EU or OECD wide reports

The OECD environmental performance reviews provide in-depth information and evaluation of developments in relation to institutional issues, but many reports are rather out of date. Several other OECD reports examine administrative issues and practices in greater detail, but generally focus on sustainable development governance in small groups of 'lead' countries. The Commission's review of national SDSs focused less on administrations and the extent to which EPI is reflected in day-to-day working practices — it was linked specifically (not surprisingly) to initiatives related to the SDSs.

Evaluations of specific initiatives

Other official documents contain evaluations of specific mechanisms, such as reports from the UK Environmental Audit Committee. These ensure that more detailed and fundamental questions regarding the effectiveness of different measures are addressed, but they are not complemented by similar reports examining other initiatives in the same or in different countries.

Independent reports and studies

An IISD report 'National Strategies for Sustainable Development: Challenges, Approaches and Innovations' (Swanson *et al.*, 2004) provides a structured and comparative analysis of SDSs and related developments in 19 countries, though only a few European countries are included. Nevertheless, this does cover many of the key questions addressed by the proposed evaluation framework.

Other papers include 'The Role of Environment and Sustainable Development Advisory' (Macrory & Niestroy, 2004). This provides an up-to-date, one-off review of existing councils in the EU countries, but does not attempt to evaluate their influence or effectiveness. With regard to EPI in administrations, Jordan *et al.* (2005) provide detailed information about a few countries (UK and the Netherlands) as well as EU level information, and Jacob and Volkery *et al.* (2004) looks at how administrative change can be promoted through various avenues using different approaches.

Particular areas where information was difficult to obtain related to EPI internal management systems, notably the allocation of responsibility, the existence of appropriate structures, and human and financial resources. Analysis of coordination and communication mechanisms, both vertical and horizontal, is also difficult given current information sources. Further thought is needed on how to approach these issues, not least to ensure that evaluations are not skewed in favour of more concrete and top-down initiatives.

Overall, the current framework does not make it possible to assess overall progress — or lack of it in terms of embedding environmental considerations within national administrative systems. There is also a tendency to focus on EPI as a series of concrete structural changes, rather than a practice and culture change. The information deficit creates the possibility of a few practices, ie those most labelled as related to EPI and those of a more directorial (and thus explicit) top-down nature, being held up as good examples, without there being any real appreciation of the more 'hidden' bottom-up initiatives. To address

this potential for the evaluation framework to focus overly on certain types of approaches or initiatives, future EPI analysis could be approached from a different angle, first identifying policies that have been secured, and then examining the extent to which administrative cultures and practice have been a help or a hindrance.

Despite these provisos, there is certainly scope to apply the proposed evaluation framework, for example by asking countries or experts in countries to apply the framework themselves and then to use this as the basis for a Europe-wide assessment. The framework could thus be used for drawing lessons from countries, for benchmarking, and to inform 'soft coordination'. Another approach is simply to use the framework to identify the more concrete developments, recognising that this may tend to generate a skewed picture. Nevertheless, building up a systematic picture of EPI developments of this type should be achievable. Further, more detailed and qualitative evaluations could be undertaken on a case study basis, allowing proper in-depth assessment of more fundamental and subtle changes.

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Annex A. EEA framework for evaluating EPI

A checklist for evaluating sectoral and cross-sectoral EPI

Context for EPI	Cross-sectoral	Sector specific	
1 Trends in drivers, pressures, changes in state of the environment, impacts	1a What are the main economic and social driving factors facing the administration?	1a What are the trends in the sector's main economic and social driving factors?	
	1b What are the magnitudes and trends of the socio-economic impacts?	1b What are the magnitudes and trend of the sector's socio-economic impacts?	
	1c Is society becoming more eco-efficient, i.e. decoupling its economic activities and outputs from environmental pressures and impacts?	1c Is the sector becoming more eco-efficient, i.e. decoupling its economic activities and outputs from environmental pressures and impacts?	
	1d Is progress being made towards key overarching SD/ environmental targets and objectives?	1d Is the sector contributing appropriately to key overarching SD/ environmental targets and objectives?	
			1e Is the sector on track to reaching its own environmental targets and objectives?
EPI categories	Cross-sectoral	Sector specific	
2 Political commitment & strategic vision	2a Is there a high-level (i.e. constitutional/legal) requirement for EPI in general?	2a Is there a high-level (i.e. constitutional/legal) requirement for EPI in the sector?	
	2b Is there an overarching EPI or SD strategy, endorsed and reviewed by the Prime Minister or President?	2b Is the sector included in an overarching strategy for EPI and/ or for sustainable development?	
			2c Does the sector have its own EPI or sustainable development strategy?
	2c Is there political leadership for EPI and/or sustainable development?	2d Is there political leadership for EPI in the sector?	
3 Administrative culture and practices	3a Do the administration's regular planning, budgetary and audit exercises reflect EPI priorities?	3a Does the sector administration's mission statement reflect environmental values?	
	3b Are environmental responsibilities reflected in the administration's internal management regime?	3b Are environmental responsibilities reflected in the sector administration's internal management regime?	
	3c Is there a strategic department/unit/committee in charge of coordinating and guiding EPI across sectors?	3c Are there cooperation mechanisms between the sector and environmental authorities?	
	3d Are there mechanisms for cooperation with higher or lower levels of governance?	3d Are there mechanisms for cooperation with higher or lower levels of governance?	

Context for EPI	Cross-sectoral	Sector specific
4 Assessments & consultation to underpin policy design and decisions	4a Does the sector have a process for <i>ex-ante</i> environmental assessment of its proposed policies or programmes?	4a Does the sector have a process for <i>ex-ante</i> environmental assessment of its proposed policies or programmes?
	4b Are environmental authorities and stakeholders engaged in mechanisms for consultation and participation in the sector's policy-making process?	4b Are environmental authorities and stakeholders engaged in mechanisms for consultation and participation in the sector's policy-making process? [coordinate with sector paper]
	4c Is environmental information available for and used to inform policy-making?	4c Is environmental information available for and used to inform policy-making?
5 Use of policy instruments to deliver EPI	5a Do market-based mechanisms support environmental objectives (e.g. by removing damaging subsidies or introducing measures to 'get the prices right')?	5a Do the sector's financial assistance programmes support environmental objectives (e.g. by introducing positive incentives or removing damaging subsidies)?
	5b Is spatial planning used to integrate sectoral and environmental issues?	5b Are other market-based instruments (e.g. taxes and emissions trading) used to internalise external environmental costs?
	5c Are environmental management instruments used for EPI, e.g. EMAS, EIA/SEA, eco-labelling, access to information/participation/justice?	5c Are there technical or other standards to promote environmental objectives in the sector?
	5d Are other instruments used to promote EPI?	5d Are other instruments used to promote EPI?
	6 Monitoring and learning from experience	6a Is progress towards sectoral and cross-sectoral EPI objectives and targets regularly monitored?
6b Is there a systematic evaluation of the effectiveness of the policies that have been put in place?		6b Is there a systematic evaluation of the effectiveness of the policies that have been put in place?
6c Are there mechanisms for exchanging good practice?		6c Are there mechanisms for exchanging good practice?

Annex B. Environment and/or sustainable development advisory councils (EU-25)

EU Member State	Environmental Advisory Council	Purpose of the Advisory Council	Membership and link to Government (ministers/Head of Government) and/or administrations (ministries)
Austria	Council for SD	A forum for dialogue on various aspects of the international dimension of SD.	Representatives of all ministries, local governments, business, science, major groups, NGOs.
Belgium	Federal Council for SD <i>Also environment councils for the Brussels region and Flanders, and an SD Council for the Walloon region</i>	An advisory body that advises the Belgian federal authorities about the federal policy on sustainable development. Also acts as a forum to encourage the sustainable development debate, for instance by means of organising symposia.	NGOs, business and industry, trade unions, federation of employers, regional ministers, scientific community, etc.
Finland	National Commission on SD <i>Also Council for Natural Resources</i>	The SD Commission acts as a forum where different stakeholders present their ideas and programmes and engage in a broad debate about sustainability. The task of the Commission has been to promote and coordinate the implementation of sustainable development in Finland.	Chaired by the PM and vice-chaired by the Minister of the Environment. Other minister members as well as representatives from the Parliament, public administration including local authorities, business and industry, labour unions, NGOs, interest groups representing different sectors of society and the media.
France	National Commission on SD (CFSD)	The CFSD is an independent consultative body, under the auspices of the Ministry of the Environment, set up by the Prime Minister.	The CFSD has representatives from local authorities, business, trade unions, environmental protection, social and consumer associations, and experts.
Germany	Council for SD (RNE) <i>Also advisory councils on environment (SRU) and on global change (WBGU) as well as Council for Land-stewardship (DRL)</i>	The RNE advises the Federal Government on its policy for SD and, by presenting proposals for targets and indicators, seeks to contribute towards the advancement of the strategy of SD and to propose projects designed to realise the strategy. Also aims to foster social dialogue on the issue of sustainability.	19 public figures including the Chairman of the DRL and the RNE and the Chair of the Association for Environmental and Nature Conservation in Germany (BUND). Representatives from the trade union, business groups, consumer associations etc.

EU Member State	Environmental Advisory Council	Purpose of the Advisory Council	Membership and link to Government (ministers/Head of Government) and/or administrations (ministries)
Ireland	Comhar — the National Sustainable Development Partnership <i>Also Heritage Council</i>	A forum for consultation and dialogue. Comhar plays an advisory role, evaluates progress, devises suitable mechanisms and advises on their implementation.	25 members from the state/public sector, economic sectors, environmental NGOs, social/community NGOs and the professional/academic sector.
Luxembourg	Supreme Council for SD	An advisory institution.	Various governmental and non-governmental bodies.
Netherlands	<i>No SD Council, but Social and Economic Council (SER), Scientific Council on Government Policy; Advisory Council for Research on Spatial Planning, Nature and Environment (RMNO); Council for Rural Area; Council for Housing, Spatial Planning and the Environment</i>	SER has been very influential. RMNO advises on the content and organisation of research on environmental issues on the mid to long term; spatial planning, nature conservation and landscape conservation issues included.	Researchers, policy-makers and users of research (consultants, trade and industry and agencies using the research in their work). The RMNO has nine members of staff working for the Council and manning the secretariat.
Portugal	National Council on Environment and SD	An independent advisory body to the Government members in charge of the environment, public entities and NGOs. It is also a forum for the formulation and implementation of environmental and sustainable development policies.	The Council has 36 members (designated by central and regional governments and more than two-thirds designated by civil society, including NGO, local communities, universities, business and trade unions), plus its Chairman.
Spain	<i>No national advisory council. A regional Advisory Council for SD of Catalonia</i>	CADS advises the Government of Catalonia on general guidelines of politics affecting sustainable development and makes proposals of actions to arrange and to improve the environment.	Although the Council is attached to the Ministry of Presidency of the Catalan Government, there is no governmental representative or Parliament member. The Council president is the rector of the Open University of Catalonia (UOC).
Sweden	Environmental Advisory Council	The Swedish Environmental Advisory Council advises the Government on environmental issues and serves as a platform for discussion on environmental policies and sustainable development.	24 members mainly from the scientific community. Chaired by the Minister for the Environment.

EU Member State	Environmental Advisory Council	Purpose of the Advisory Council	Membership and link to Government (ministers/Head of Government) and/or administrations (ministries)
UK	SD Commission. Also a Royal Commission on Environment Pollution	SD Commission reports to the Prime Minister and First Ministers from the devolved administrations, advocating SD across sectors, reviewing progress and building consensus on actions needed.	20 Commissioners from commerce, youth work, academia, trade unions, politics and government, non-profit, and grassroots action groups.
EU-10			
Czech Republic	Advisory Council for SD	The Council initiates and supports strategic dimensions in governmental practice and provides coordination, monitoring and evaluation of the implementation of strategic aspects.	The Council is chaired by the Deputy PM and includes ministers, and representatives from central and local authorities, social partners, NGOs and academics.
Cyprus	Council for the Environment	The Council advises the Minister and through him, the Council of Ministers, on environment and sustainable development issues.	
Estonia	Commission for SD	According to the given mandate the Estonian Commission on Sustainable Development is functioning as an advisory body to the Government. The priority areas are: Elaboration and implementation of the Estonian Strategy on Sustainable Development and implementation of the Regional Sustainable Development Strategy – Baltic Agenda 21 – action plan.	Members are appointed by the institutional affiliation (Government, Parliament, Academia, NGOs, Business, Government institutions) and approved by the Government. The ECSD operates under the leadership of the PM and the Minister of the Environment and the Minister of Economic Affairs and Communications.
Hungary	National Council on the Environment	The Council is a statutory independent advisory body to the Hungarian Government.	21 representatives of major stakeholder groups in environmental matters, such as industry, academia and the environmental movement.
Latvia	Council of National Economy		Chaired by the Government

EU Member State	Environmental Advisory Council	Purpose of the Advisory Council	Membership and link to Government (ministers/Head of Government) and/or administrations (ministries)
Malta	National Commission for SD	The NCSD's main remit is to advocate national sustainable development across all sectors and identify relevant processes or policies which may be undermining sustainable development, and to propose alternative processes or policies to the Government for adoption.	Chaired by the Government.
Poland	State Environmental Council <i>Also State Council for Nature Protection</i>	Advisory duties to the Minister of Environment on country-wide and local conflicts, consulting environmental legislation, serving other ad hoc activities on own initiative or requested by the Minister. The council is an independent expert body.	25 scientists are members. The number was limited to 30 in 2001.
Slovakia	Government Council for SD	This is acts as an advisory and coordinating body. Specific tasks include coordinating activities of particular ministries, assessing inter-linkages of various strategies, concepts, etc., discussing outcomes of impacts assessments of strategic developments and legislative proposals that may have environmental implications, evaluating SD indicators and Agenda 21 reports, and coordinating activities regarding the UN CSD.	Chaired by the deputy Prime Minister. Other members include ministers, heads of central government departments and regional authorities, scientists and NGOs.
Slovenia	Council for Environmental Protection (CEPRS)	The Council operates independently. The objective of the Council is to monitor the quality and the protection of the environment in Slovenia and ensure the connection and inclusion of Slovenia in global environmental actions elsewhere.	The members of Council are all experts and researchers in various fields of science.

Source: Adapted from Macrory & Niestroy, 2004

Annex C. Glossary

APS	Annual Policy Strategy
CAF	Common European Assessment Framework
CESD	Commissioner of the Environment and Sustainable Development, Canada
DG	Directorate-General
EAC	Environmental Audit Committee
EEA	European Environment Agency
EECCA	Eastern Europe, the Caucus and Central Asia
EFTA	European Free Trade Area
EMAS	Environmental Management and Audi Scheme
EPI	Environmental Policy Integration
EPR	Environmental Performance Reviews
EQOs	Environmental Quality Objectives
EU	European Union
EU-15	The EU Member States pre enlargement in 2004
EU-25	The enlarged Community, as of 1 May 2004
EU SDS	EU Sustainable Development Strategy
FYROM	Former Yugoslav Republic of Macedonia
GMO	Genetically modified organism
MBO	Management By Objectives
NCRSD	National Council on Regional Sustainable Development
NEP4	fourth National Environmental Policy Plan, Netherlands
NPM	New Public Management
NSDS	National Sustainable Development Strategy
PSA	Public Service Agreement
OECD	Organisation for Economic Cooperation and Development
REACH	Registration, Authorisation, Evaluation and Restriction of Chemicals
RUMBA	Resource and Environmental Management in the Federal Administration
SD	Sustainable Development
SDS	Sustainable Development Strategy
WTO	World Trade Organisation

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ISBN 92-9167-767-1

