

POLICY NETWORKS AND THE EUROPEAN COMMUNITY:
EXPLAINING EC ENVIRONMENTAL POLICY

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INTRODUCTION

This paper represents a preliminary attempt to apply a policy networks approach to European Community (EC) environmental policymaking. It argues that network analysis can help us explain the EC's environmental policymaking process, its outputs, and its interaction with other policy spheres.¹ The paper begins by outlining the basic components and variations of policy networks. In Section II EC environmental policy is described as taking place within a relatively loose "issue network". Section III uses network analysis to help explain environmental policy outputs, with emphasis on legislation related to water quality and auto emissions. In Section IV the interaction between environmental and other policy networks is explored. This section examines why environmental concerns are not effectively integrated into policy areas such as agriculture, the internal market and regional funding. Section V examines the prospects for change within and among EC policy networks. The conclusion assesses the usefulness of policy network analysis in explaining EC environmental policies, and suggests areas for further research.

I. POLICY NETWORKS

The model of policy networks has been developed primarily as a means for describing relationships between private and public actors. The approach is an attempt to move beyond pluralist and corporatist models of government/private interest intermediation. Like pluralism and corporatism, the policy network approach attempts to explain the intermediation of public and private interests. But analysts employing a policy network approach argue that neither pluralism nor corporatism provide a realistic picture of the relationship between public and private actors because they try to offer a general model of these relationships.

Jordan and Schubert (1992: 10) point out that states are not uniform in their capacities in all policy areas. In "pluralist" systems, some fields of sectoral corporatism will exist, while in corporatist systems there are policy areas that exhibit a pluralist pattern of interest intermediation. In other words, the relationships between private and public interests vary considerably across policy areas. The policy networks approach draws from these two models but emphasizes the need to disaggregate policy analysis because of this variation (Marsh and Rhodes, 1992: 4).

Policy networks have been defined as a cluster of "organisations connected to each other by resource dependencies; and distinguished from other clusters by breaks in the structure of resource dependencies (Benson, 1982: 148). "Resource dependencies" refer to the extent to which actors depend on one

another for resources such as information, expertise, access and legitimacy. "Breaks" refer to fact that specific resources are compartmentalized and dedicated to a specific policy area or set of goals.

A policy network thus includes an identifiable and policy-concerned set of public and private actors. The structural dependencies (or linkages) between actors serve as channels for communication and exchange of information, expertise, trust and other policy resources. The boundary of a policy network is not determined by institutions or formal distribution of power but by a mutual recognition of resource dependencies (Kenis and Schneider, 1989: 14). In other words, policy networks emphasize the informal relationships surrounding policymaking. Typically, bureaucrats from different levels of government, interest groups and committees of experts are intimately involved in setting policy agendas, defining policy problems, and setting out an acceptable range of options. The policy networks approach assumes that these informal factors better account for policy outputs than do party stances, political leadership or parliamentary influence.

This paper adopts the concept as refined by Rhodes (1988; Marsh and Rhodes, 1992). In the "Rhodes model" the following factors are emphasized:

- 1) the relative stability of network membership;
- 2) resource dependencies;
- 3) the relative insularity and autonomy of networks, (i.e. the degree to which interests not directly involved in a certain policy area are effectively excluded from influence).

In most cases, policy networks form around broad functional areas or policy sectors (agriculture, environment, transport, etc.). Working with the three variables listed above we can construct a continuum of networks (see Rhodes, 1988; Marsh and Rhodes, 1991). On the "tight" end of the continuum are policy communities. These are networks characterised by stable relationships, restricted membership, strong structural dependencies, and insulation from both other networks, parliament, and the general public.

In a policy community a limited number of participants share similar values regarding desired policy outcomes, and decisions are made autonomously of public and parliamentary preferences. It is thus possible to "depoliticize" a policy arena by excluding groups which are likely to disagree with the established policy agenda (Smith, 1991: 235-36). Such communities are sustained because they work to the benefit of all participants. Interest groups can save the costs associated with repeated efforts to gain access and influence by building a more permanent relationship of trust and resource dependence. On the other hand, administrators and bureaucrats can save on costs of information collection and efforts to acquire assistance and cooperation (Jordan and Schubert, 1992: 16).

The most cited example of a policy community at work is the network surrounding British or EC agricultural policymaking (Smith, 1990; Peterson, 1989). But even tight communities can loosen as network issues become politicized or external factors permeate network borders (Smith, 1991; Peterson, 1991). In other words, networks can change.

On the other end of the continuum are issue networks, characterised by fluid membership, highly permeable boundaries, weak dependencies, and the inclusion of wider, oppositional interests. Hecllo (1978) views issue networks as incorporating a wide range of decisionmaking centres and a wide range of actors which move in and out of policy arenas and have different views of desired policy outcomes. Compared with other networks, an issue network is a relatively *ad hoc* policymaking structure in which not only a large, but to a certain extent unpredictable number of conflicting interests participate. A more detailed illustration of an issue network is provided below.

II. EC ENVIRONMENTAL POLICY AS AN ISSUE NETWORK

The notion of policy networks can be used to explain policymaking in national settings as well as in the EC. This transnational application is relatively recent. Peterson employs the model to analyze aspects of the EC's agricultural policy (1989) and European technology policy (1991). Others (Mazey and Richardson, 1992) use the approach to help explain the strategies and effects of lobbying in the EC.

The approach is particularly useful at the EC level because it recognizes the complexity of the EC policymaking system. The EC incorporates a wider set of interests than does any national system of policymaking. Moreover, compared with national settings, power within the EC is highly situation-specific; there

are few clear lines of authority or standard consultative patterns within the EC generally. The process of policy formation in the EC is multilayered and complex. The policy network approach can be used to highlight what is different about EC policymaking in discrete sectors of policy. It draws attention to the varying strength of different actors in different policy sectors. Its emphasis on resource dependencies help identify which actors' interests are decisive and why.

The approach is a particularly helpful tool in understanding the relatively new system of EC environmental policymaking. Unlike more entrenched policy sectors such as those surrounding the regulation of the chemicals industry or agricultural policy, patterns of EC policymaking in the environmental arena are still quite new and fluid. Environmental policy is characterised by rapid change and fierce struggles between competing institutions and actors. It is best understood as occurring within an issue network populated by wide range of actors. A brief examination of EC environmental policymaking underlines its issue network character.

The first indicator of a network is its permeability, the extent to which external pressures impinge on the network's policymaking process. Growing public concern for the environment has "politicized" environmental issues and rendered them susceptible to public pressures, debate and scrutiny. Moreover, environmental issues have become increasingly intertwined with other sectoral issues, especially those surrounding agriculture, regional funding, transport and internal market policies.

Pressures from these other sectors influence the scope and nature of environmental policy and blur the boundaries of the environmental issue network.

Indeed, most environmental issues cross over several policy areas and EC Directorates-General (DGs). Extensive discussions must take place within the Commission itself to determine which policies should be allocated among which Directorates. In short, the networks' permeability means that "there is not only conflict regarding outcomes but about the definition of the problem" (Jordan and Schubert, 1992: 13).

Because of the wide and diverse scope of issues covered in the environmental network, membership tends to be unstable or fluid. The EC's environmental issue network can include actors from DG XI (the Directorate responsible for Environment, Nuclear Safety and Civil Protection), members of other DGs, national civil servants and representatives, scientific experts, Members of the European Parliament (MEPs), environmental and business interest groups. In this complex and crowded policymaking milieu there is a changing cast of participants over time and according to specific issues. Whilst a small group of officials in DG XI provide some form of membership stability, they are but one of many actors involved in the policymaking process.

Given the restricted size of its permanent staff, DG XI must rely on a wide array of participants from outside its department for technical and political advice. In particular, it depends on experts and officials on secondment from other EC institutions, from Member-State departments and from private organisations and

foundations. One official in DG XI claimed that "we have more officials on loan than any other DG".² The role of temporary scientific experts was underscored by an MEP and Chairman of the European Parliament's Environment Committee:

[EC] policymaking in the environmental area is curious in that it is made up of the normal political folk but its also made up scientists of various kinds. They might be biochemists, biologists, or physicists...but they're all mixed up with the political types and this makes for a very disparate network.³

The strength or weakness of structural dependencies represents a third defining component of policy networks. Instead of a tight relationship underpinned by strong dependency relationships, the environmental network includes more informal, less standardized sharing of resources among a wide variety of members. The Commission currently has no central database or clearing house of environmental or technological information. Whilst the creation of a European Environmental Agency (EEA) is intended to provide such a database, it is still waiting for an institutional home.

Instead, network members located in DG XI rely on a broad range of sources (environmental groups, business interests, scientific experts, etc.) for information, expertise and legitimacy. They thus are not dependent on a select few sources. The extent to which the Commission relies on others to help define a policy problem was underlined by the head of DG XI, Laurens Brinkhorst. Writing in the trade journal of the British Town and Country Planning Association (TCPA), the head of DG XI urged:

The Commission has only a small staff involved in environmental policymaking and depends to a large extent on inputs from bodies such as the TCPA as it develops its policies. We would therefore welcome contributions to the development of our thinking (Brinkhorst, 1991: 21).

Conversely, interest groups concerned with environmental issues have several alternative access points located within the multiple EC institutions as well as those on the national level. In short, dependencies remain weak because they are variable and diffuse.

An issue network is characterised also by the inclusion of a wide array of members and interests. Firstly, an issue network reflects the competing interests expressed by representatives of 12 Member States. For instance, national representatives from The Netherlands have taken a lead role in pushing the Commission to adopt at the EC level the same ambitious and overtly preventive approach reflected in Dutch national environmental programmes (Boons, 1991: 15). Conversely, representatives from Spain and Portugal have often take the view that the stringency of EC regulations hinders economic growth and development.

Secondly, DG XI is generally considered to be more open to lobbyists than any other DG. In particular, the relatively open and diffuse nature of an issue network allows unprecedented opportunities for environmental non-governmental organisations (NGOs) to lobby and exert influence. Among the most active is the European Environmental Bureau (EEB) which represents over 120 environmental organisations. These NGOs moreover, can have a decided impact on pushing issues on to the environmental agenda. An advisor to the Environment Commissioner Iaonnis Paleokrassus

observed that especially in areas related to nuclear energy, waste transport and water management, lobbying from environmental groups "clearly has some impact on the formulation of EC legislation".⁴

Moreover, whereas policy communities tend to exclude parliamentary influence and scrutiny, the EC's environmental issue network is distinctively open to influence from the European Parliament (EP). Indeed, the Commission welcomes the Parliament's view precisely because the EP is democratically elected and thus can legitimate EC environmental policy. An official in the UK's Department of the Environment unit responsible for European affairs confided that:

the Parliament carries a lot of weight with the Commission because the Commission knows that even if [the EP's] powers are primarily advisory, it is democratically elected and the Commission is not. This feeling of slight inferiority on the Commission's part induces them to take more seriously the views of the Parliament than they would otherwise do, so that you will find they go out of their way...to take account of the Parliament's opinion.⁵

The EP has successfully taken advantage of the greater environmental awareness among its electorates. Pushed by a small but vocal Green group of Members of the European Parliament (MEPs) and a active Environment Committee, the Parliament has promoted its own "environmental agenda" by providing the Commission with well researched inputs into legislative proposals on a variety of environmental issues such as drinking water quality and auto emissions. It has also established its own inquiries into controversial issues such as the handling of waste and nuclear safety (see Bomberg, 1994). The role of the EP and NGOs in setting agendas demonstrates the uniquely open character of the EC's environmental issue network.

In sum, EC environmental policies are subject to bargaining between a vast array of actors over the definition of the problem as well as the desired outcome. This process usually includes not only competing DGs and Commissioners and experts from various backgrounds, but also various EP committees, and representatives of national governments and interest groups.

III. EXPLAINING OUTPUTS

There is no single "issue network output." Rather, the diversity and complexity of an issue network renders its outputs unpredictable, complex and sometimes contradictory. Majone (1989: 158-61) is correct to distinguish between different "policy spaces" or closely interrelated individual policies which have a life of their own with distinct institutional arrangements, policy problems and logics of development. In certain "policy spaces" or areas such as water quality, toxic waste, and pollution standards the network has produced relatively stringent legislation. These "policy spaces" tend to be areas in which scientific evidence is uncertain or ambiguous; environmental NGOs and MEPs control valuable resources such as information and legitimacy; and pressure from other networks or non-network actors is weak or contradictory.

One well known example of this type of legislation is the 1989 Directive setting auto emission standards for small cars (OJ L 226 3.8.89). The decisive role of the EP and environmental

NGOs is widely acknowledged in this case. Put simply, the Parliament, working with the EEB, was able to force the Council of Ministers to amend its earlier, less stringent standards on auto emissions (see Arp, 1991; Bomberg and Peterson, 1993: 151-2).

This policy issue was characterised by technological uncertainty as to the "cleanest" and most effective means of reducing emissions (see Arp, 1991: 5-7). It was further characterized by active, concerted participation by environmental NGOs and MEPs. These "green actors" took advantage of public support and their role as representatives of the public consciousness. This source of legitimacy was not lost on the Commission. David Grant Lawrence, a member of the Environment Commissioner's cabinet, recalled, "This was a turning point for the Commission. It came just before the European elections. It was becoming clear that the Greens would do well everywhere. No minister could afford to be seen to sabotage a good decision" (quoted in The Independent, 8 May 1990).

Finally, network actors keen to see stricter standards were able to exploit splits within the Council of Ministers between countries who favoured more stringent limits (Germany, The Netherlands) and those preferring earlier, laxer standards (France, Spain, Italy). The auto emissions case demonstrates the circumstances under which an issue network can produce strong and effective policies. In this case, the output was an EC policy which set a minimum level of environmental protection which was higher than could have been achieved at a domestic level in most EC Member States. More recent examples of this sort of process

and outcome include policies relating to toxic waste transport and organic farming (see Bomberg, 1994).

But outputs emanating from issue network tend to be as diverse, confusing or ambiguous as the process which created them. The implications of this confusion on successful policy implementation are substantial. Analysts such as Liberatore (1991) and Collins and Earnshaw (1992) cite policy incoherence as a key cause of lax implementation and outright non-compliance. An example is found in the case of water quality standards, an area in which the EC has produced some of its most stringent legislation (see Bomberg and Peterson, 1993: 149-51). An EC directive on drinking water quality was adopted in 1980. By 1989, most EC Member States still failed to meet its standards and the Commission began infringement proceedings against six Member States (Lewis, 1991: 67). The Commission admitted that the directive was adopted at a time when the state of knowledge about the harmfulness of water pollutants - especially pesticides - was in its infancy. But DG XI officials were quick to note:

[T]he pesticide parameter... was not even proposed by the Commission, but rather by a group of national experts which worked as part of the preparation of this Directive. These young people with high ambitions for the protection of the environment and health took the point of view that pesticides should be used in such a way that they did not find their way into drinking water... Thus, there should be no doubt that the pesticide parameter in the Drinking Water Directive has to be seen in a political context (Henningsen, 1990: 6-7).

Yet, national governments complain that the Commission wants more from them than is realistic or necessary. They find support from scientists (see Wilkie, 1992) and the agrochemical industry, which argues that "the EC seem[s] to show a disturbing unawareness of the very significant amounts of good data which

have been produced showing that the effects of pesticides...are not really as great as had been assumed" (Foulkes, 1990: 118)

The point is, certain features of an issue network - its reliance on ambitious environmentalists and varying, sometimes conflicting, scientific advice - can result in policies which are difficult to follow and harder to implement. Anderson (1991: 182) concludes that EC environmental legislation is "environmentally stringent, comprehensive and far ranging, but ... also widely flouted."

Finally, an issue network's policy outputs may be contradictory as well as confusing. Current policies emanating from the environmental network may conflict with earlier environmental policies. For instance, Collins and Earnshaw (1992: 224-5) illustrate the contradictions in Community legislation relating to the discharges of toxins aldrin, dieldrin, endrin and isodrin into the aquatic environment. More often, the contradiction emerges between environmental policies and policies produced by other networks in areas such as internal market, transport, agriculture or regional funding. The next section explores the interaction and integration of these different EC policy networks.

IV. NETWORK INTERACTION AND INTEGRATION

The need for integration of environmental policies into other spheres such as the internal market, agriculture, or regional

policy has become evident to many policy analysts and practitioners. Constitutionally and formally, the link is well established. The inclusion of environmental factors into other EC policies was first made explicit in the 1987 Single European Act which mandated that "environmental protection requirements shall be a component of the Community's other policies." The 4th Environmental Action Programme (1987-92) reemphasized this goal in relation to regional funds:

The Commission is already working on the development of effective internal procedures to ensure that environmental requirements are built into the processes of assessing and appraising proposals for all development to be financed from [Community] funds... (CEC, 1986).

The most recent 5th Action Programme, *Towards Sustainability*, expresses the need to integrate environmental policies more explicitly into other policy areas. It states that "[g]iven the goal of achieving sustainable development, it seems only logical, if not essential, to apply an assessment of the environmental implications of all relevant policies, plans and programmes..." (CEC, 1992: 66)

Yet progress towards integrating environmental considerations in EC procedures has been slow and difficult (Baldock, 1992; Weale and Williams, 1992). Whereas environmental policy has become more stringent in its own traditional domain the impact of environmental policies on other areas of policies remains weak. In September 1992 the EC Environment Council itself accepted that there have been many instances where Community actions "had been developed with insufficient regard for effects on the environment, and in some cases in direct conflict with established Community environmental aims and policies" (quoted in

Wilson, 1993: 4). In short, other networks were producing policies which not only failed to incorporate environmental criteria; in many instances they contradicted them.

The non-integration of environmental criteria into other policies is particularly visible in the interaction of regional and environmental policy outputs. The conflict between EC environmental directives and decisions on EC regional funding for peripheral regions is widely documented (see Baldock and Wenning, 1990; Court of Auditors, 1992; *The Guardian*, 4 December 1992, pp. 16-17; Wright, 1992). In several instances, EC Structural Funds⁶ are being used to finance infrastructure projects (such as roads and dams) which seriously degrade the environment. A growing awareness of this problem prompted an investigation by the EC's Court of Auditors in 1990-91. The resulting report was a damning critique of the poor coordination between these two policies and the environmental degradation such non-integration had caused. (Court of Auditors, 1992)

Contradictory outputs also emerge from the interaction of environmental and agricultural policies (see Bomberg and Peterson, 1993). A directive passed in 1991 by agricultural ministers regulating the sale of new types of pesticides clearly conflicted with an earlier directive approved in 1990 by the Environmental Council of Ministers. The Environment Directive stipulated that genetically-modified organisms (GMOs) designed for use as pesticides could only be sold after a detailed assessment of their environmental impact. The later directive contained no such provisions for assessing GMOs and mandated that a committee of agricultural experts - not environmental

authorities - would license new pesticides. Both DG XI and Green MEPs argued that leaving such decisions to a committee associated with agribusiness amounted to the inmates taking over the asylum (MacKenzie, 1991).

Constitutional or formal changes, in other words, do not alone bring about change. While the SEA and Action Programmes mandate that environmental concerns need to be incorporated into all other areas of EC policy, network dynamics mitigate against such an integrated approach. In particular, three causes related to the structure and interaction of different policy networks help explain this lack of integration or coordination.

First, the relationship between different kinds of networks tend to be unbalanced because of disparities in their coherency, stability and autonomy. While the environmental network remains permeable and open to influences from other actors and networks, it is comparatively too weak to exercise influence in kind. This is primarily because the issue network, as described above, is relatively new, less established, and poorly resourced. Moreover, its diversity and open character mean that its outputs or "signals" to other actors may be ambivalent, incoherent or confusing. In short, its issue network characteristics disadvantage it in relations with other, better established policy networks.

For instance, Weale and Williams (1992: 58) argue that despite the growth in importance of the environmental portfolio in recent years, it is still relatively junior in comparison to other policy areas. In the case of internal market policy this

imbalance "makes it difficult to challenge a programme whose essential features had already been established by powerful actors within the policymaking system." Put bluntly, the relationship between networks is characterised by subordination rather than integration.

The second cause of the "integration deficit" is the lack of overlap between network membership. To begin with, the DGs tend to be tightly compartmentalised and often pursue their own bureaucratic mission in isolation from whatever the rest of the Commission is doing (see Peters, 1992).

Other network actors, such as the environmental NGOs, have also tended to concentrate their lobbying efforts within the environmental network. The reason for this is primarily "ease of entry." Two harried DG XI officials quoted in Mazey and Richardson (1992: 111) describe access to DG XI as something of a "free for all" with the "door open for any groups wishing to contact Commission officers ..." Gaining admission to more established and closed networks is obviously much more difficult.

This limited access represents the third obstacle to closer coordination of environmental and other EC policies. Several other networks, particularly those surrounding agricultural policy, remain insular and more impervious to outside influences. For instance, in contrast to the loose issue network in which environmental policy is made, agricultural policy, including policy regarding the regulations of agrochemicals, is formulated within a tighter policy community which is defined by tight relationships between a few select actors (see Peterson, 1989).

Taken together, these traditional patterns of network interaction tend to produce policy conflict rather than policy coordination. The prospects for change in this dynamic will be discussed below.

V. NETWORK CHANGE

Networks can change. They can become less or more structurally dependent, open, permeable or fluid. For instance, as the environmental network matures, it may become less diffuse and permeable. Indeed, part of the 5th Action Programme includes plans for more routinised consultation of interests. The Programme promotes the establishment of a "consultative forum" to include representatives of enterprise, consumers, professional organisations, and other NGOs and local and regional authorities (Watts, 1992: 49). The idea is to create more coherency and "promote a greater sense of responsibility among the principal actors" within the network (CEC, 1992).

Institutionalizing networks in this way may produce more coherent, effective environmental policies. It might also tighten and entrench the network, thereby limiting severely the participation of the public and environmental actors. Commenting on this development, Mazey and Richardson (1992: 126) warn environmentalists that their challenging and confrontational styles may well be incompatible with the unwritten "rules of the

game" implied by the more regularised and structured form of group participation envisioned in the 5th Action Programme.

The interaction among networks is also subject to constant flux. There are some indications that a new network dynamic is underway, one which is more conducive to integration. The impetus for change has come from both external and internal forces. First, change might follow on from "macro" institutional developments. For instance, if ratified, the Treaty on European Union agreed in December 1991 at Maastricht could further promote the integration of environmental and other policies. Whereas the SEA simply stated that environmental protection requirements are "a component of the Community's other policies", the Maastricht Treaty's Article 130 r(2) goes further, stipulating that these requirements "must be integrated into the definition and implementation of other Community policies".

Closer coordination may also emerge "from within", through actions taken by network actors themselves. First, DG XI is pushing hard for a more active meshing of networks. It has commenced discussions with DG VII (Transport) to ensure that environmental impacts are included in transport infrastructure plans or the development of a high speed train network (Wilson 1993: 5). More ambitiously, it has asked all DGs to calculate aggregate totals for all spending on environmental measures and to inform DG XI of the full results from this exercise.

Such assertiveness by DG XI officials may be made easier by a strengthening of its resource base. The historical imbalance of resources and clout between networks may be shifting in favour

of the environmental network. Overall environmental expenditure levels have begun to rise steeply (Court of Auditors, 1992). Moreover, agreements reached at the Edinburgh summit in December 1992 mean that the EEA can now find an institutional base after years of delay. Its establishment will provide a much needed base of information and technical data. Clearly this strengthening of financial and informational resources will strengthen DG XI's coordinating role.

Secondly, environmental NGOs and MEPs are making more concerted efforts to penetrate networks responsible for the formulation of other Community policies. For instance, beginning in the late 1980s, the World Wide Fund for Nature (WWF) began earnest attempts to lobby policymakers involved in the formulation of EC regional funding. Struck by the insularity of this policymaking network, it urged that "independent outsiders and NGOs...[should] have access to plans and programmes submitted, to see whether they do contain information about the environment and to see whether it is accurate" (WWF, 1989: 7-8).

In February 1992, 66 environmental organisations called for reforms of Structural Funds. In a report sent to the Commission, EP and Council Presidency, the organisations called for radical changes "needed to ensure that EC money is not used to damage the environment".⁷ They demanded that local authorities, governments and EC have access to more information about the environmental impact of a project before it received financing from the EC's Structural Funds. The activities of these groups reflect concern about the policymaking process as much as its

substance. Mazey and Richardson (1993: 17) observe that "essentially the argument was about the groups' right to participate in the policy formulation and implementation process regarding the Structural Funds."

Thirdly, there is evidence that other networks - such as those responsible for the formulation of regional funding - may become looser, more transparent and more amenable to demands from outside or oppositional interests. Officials from DG XVI (Regional Policy) insist that actors within this DG now accept the need to incorporate environmental objectives into its multi-annual programmes and projects. More specifically these officials highlight DG XVI's progress in developing more effective policy evaluation techniques, and establishing working groups to develop environmental indicators.⁸

It is still too early to assess the applicability or durability of these good intentions. Efforts by other networks to incorporate environmental concerns may constitute fundamental change, or they may amount to nothing more than empty promises. It should be noted that past institutional or constitutional changes have not brought about the called for policy integration.

Moreover, DG XVI aside, the prospects of change within other networks seem less likely. Some networks, especially those surrounding agriculture policy, remain unaffected by environmental concerns or calls for integration. In an biennial review of EC environmental policy, Hagland (1991: 263) argues that despite the protest from the EEB and other environmental

organizations as to the contribution of the Common Agricultural Policy (CAP) to environmental degradation the continuing dominance of the CAP in the calculation of EC policymakers "makes any challenge along environmental lines politically difficult". In short, as every student of the Community knows, "integration" is a buzzword easier to utter than implement.

VI. CONCLUSION AND FURTHER RESEARCH

This paper has presented the policy networks approach as a useful way of explaining EC environmental policymaking. This approach helps us order evidence in novel ways and it provides clues to anticipate policy outcomes. In particular, it helps explain how decisions are made in different settings, which actors are decisive and why. Beyond that, the approach encourages the exploration of the interaction among networks. This paper examined the link between the environmental issue network and other EC policy networks. It indicated that such interaction can have significant consequences for environmental protection, but that obstacles to closer coordination or integration of networks remain formidable.

Obviously there are limits to this model's explanatory power and further research is necessary to test its applicability. First, the policy networks approach does not constitute a theory. Its emphasis is on description and explanation rather than prediction. Secondly, the approach can be faulted for focusing

primarily on day-to-day, even routine decisions taken at the EC level. It may have limited use in explaining the EC's "history making decisions", i.e. the dramatic decisions taken by EC Member States to revise the Treaty of Rome via the Single European Act and the Maastricht Treaty. These history making decisions impinge on the making of environmental policy by altering the EC's legislative procedures, rebalancing the powers of different EC institutions, and expanding the EC's remit. The link between the everyday decisions and the larger, "macro" developments needs to be examined.

A related issue deserving further research is the coordination among EC, national and regional networks responsible for implementing EC policies. This paper has said little about implementation, focusing primarily on agenda-setting and policy formulation. But national and regional authorities are increasingly responsible for the success of EC policies "on the ground." Further study is needed which makes explicit how decisions are coordinated not just across different policy sectors but between levels of government as well.

NOTES

1. This paper will form part of a larger collaborative project which examines policymaking in different policy sectors within the EC. The completed study will appear under the title Decision Making in the European Union: Who Gets What From Europe, by John Peterson and Elizabeth Bomberg (Macmillan, 1995).
2. Interview with official in DG XI, 27 January 1993, Brussels.
3. Interview with Scottish MEP, 26 February 1993, East Kilbride, Scotland.
4. Interview with member of Commissioner Ioannis Paleokrassus' cabinet, 28 January 1993, Brussels.
5. Interview with official in the UK Department of Environment's Environmental Protection Unit, 11 September 1991, London.
6. The Structural Funds include the European Social Fund (ESF) the Guidance Section of the Community Agricultural Fund (FEOGA) and the European Regional Development Fund (ERDF). The ERDF is the largest; it is designed to help disadvantaged regions by supporting economic activity and financing infrastructure improvements (see Baldock and Wenning, 1990).
7. WWF European Office spokesman Tony Long, quoted in Europe Environment Fortnightly, 18 Feb 1992, Pt II, p.2.
8. Interview with two officials in DG XVI, 29 January 1993, Brussels.

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