

Impact Assessment in the EU: A global sustainable development perspective

by

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Abstract

The achievement of sustainable development is a cross-cutting policy issue *par excellence* necessitating policy coordination. This is especially true considering that the European Union's (EU) Sustainable Development Strategy specifies that all EU policies must actively support the sustainable development of other countries, particularly developing countries. Therefore, in search of sustainable development the impacts of policies both inside and outside the EU have to be considered.

Achieving policy coordination represents a persistent problem for all political systems but is especially difficult for the EU due to its high degree of institutional complexity and fragmentation. In pursuit of greater policy coordination, all new policies being developed by the European Commission since 2003 have undergone a two tiered Impact Assessment (IA) process. This is intended to facilitate the flow of information among networks of interested parties so that likely trade-offs in achieving competing policy objectives can be identified. These networks are anticipated to act as a 'bottom-up' tool for coordination with little central steering from the Commission. This is in keeping with the EU's desire to operate a more networked style of governance. This research evaluates 41 of the extended impact assessments to ascertain how well they consider potential impacts of EU policies beyond its borders, particularly in developing countries.

1. Introduction

The achievement of sustainable development is quintessentially a cross-cutting policy issue necessitating policy coordination. It does not fit neatly into department policy remits and so responsibility for it has to be spread across a range of decision-making bodies. Sustainable development is now a fundamental goal of the European Union. In the process of reconciling the differences between the goals of sustainable development and the other policy objectives, not only do environmental, social and economic impacts of EU policies have to be reconciled, but the impacts of policies both inside and outside the EU's borders have to be considered. In particular, the EU's Sustainable Development Strategy recognises that all EU policies "must actively support efforts by other countries – particularly those in the developing world – to achieve development that is more sustainable" (CEC 2001a, 9).

There is little moral high ground in achieving sustainable development within the EU's own borders if it simply exports its sustainable development problems to other areas. Accordingly, the outgoing EU Environment Commissioner Margot Wallstrom recently warned that "our credibility will suffer if unsustainable trends persist or if our policies have detrimental impacts outside the EU, in particular on the development opportunities of the poorest countries" (Wallstrom 2003). These detrimental impacts are frequently inconsistent with objectives, such as integrating developing countries into the world economy and halving extreme poverty in the world by 2015, that the EU has signed up for in various international agreements, (e.g. the Johannesburg Plan of Implementation and the Millennium Development Goals) as well as in various internal EU documents (e.g. the 'external' Sustainable Development Strategy "*Towards a Global Partnership for Sustainable Development*" (CEC 2002a) and the follow up document "*The World Summit on Sustainable Development One Year On*" (CEC203a).

In contrast, the EU is an ever increasingly powerful 'global player' and has itself recognised that it is "well placed to assume a leading role in the pursuit of global sustainable development" (CEC 2002a, 6). This has been a role taken by the EU recently in the World Summit on Sustainable Development (WSSD) in Johannesburg, the Kyoto Protocol and the World Trade Organisation (WTO) discussions. As a consequence, it is inevitable that the spotlight turns on the EU's own track record on sustainable development (Burchell and Lightfoot 2004). However, comparatively little attention has been given, routinely to addressing the negative impacts that the EU has on developing countries. Instead, the EU has focused on internal EU problems, such as pollution, or on global problems such as climate change, which have truly global consequences (Coffey and Baldock 2003). However, a third type of sustainable development issue, where EU policies (e.g. the Common Agricultural policy or the Common Fisheries Policy) have impacts on third countries, also has to be addressed. Progress has to be made translating the objectives in international agreements and EU documents into more coordinated policies where EU internal goals can be reached without impacting negatively on other countries.

Achieving policy coordination represents a persistent challenge for all political systems (Jennings and Crane 1994) but a high degree of institutional complexity and

fragmentation mean that the EU “has an even greater problem than most political systems with coordination” (Peters 2001, 84). The EU currently employs three mechanisms which attempt to achieve sustainable development through greater environmental coordination. First, in 1998 the Cardiff Process was initiated when the Council of Ministers were requested to develop their own strategies to give effect to “environmental integration and sustainable development” in their sector (EC 1998, 13). Second, the EU Sustainable Development Strategy *A Sustainable Europe for a Better World: A European Union Strategy for Sustainable Development* (CEC 2001a) was developed in 2001. A third mechanism for delivering environmental coordination is now completing its second year. Since 2003 all new policy proposals from the Commission have had to go through a two tiered Impact Assessment (IA) process. This is intended to be a tool to improve the quality and coherence of the policy development process by identifying “the likely positive and negative impacts of proposed policy actions, enabling informed political judgements to be made about the proposal and identify trade-offs in achieving competing objectives” (CEC 2002b,2). The Guidelines for constructing the IAs specifies that impacts outside the EU are to be included in the analysis (CEC without year, 24).

This new IA process was introduced by the Commission June 2002 in a Communication on *Impact Assessment* (CEC 2002b). It stemmed from both a call by the Sustainable Development Strategy to introduce “mechanisms to ensure that all major policy proposals included a sustainability impact assessment” (EC 2001) and the Commission’s Communication *Simplifying and Improving the Regulatory Environment* (CEC 2001c, 7) which proposed that a “coherent method for impact analysis would be introduced for all major Commission policy proposals”. Therefore, IA replaces the requirement for all other types of impact assessment, such as business impact assessment, gender assessment and environmental assessment (CEC 2002b). It was also presented by the Commission as an “effective and valuable communication tool” as it was anticipated that the IA process would be a focus for consultation and discussion with interested parties (CEC 2002b,3). The IA system is a two-stage approach: a preliminary IA and an extended IA. The College of the Commission use the former as a basis on which to decide which major policy proposals (i.e. those presented in the Annual Policy Strategy or work programme) will be subject to an extended IA.

If the EU is serious in its aspiration to support sustainable development beyond its own borders, it could be expected that there would be evidence of the external dimension of sustainable development being considered alongside the internal EU dimension in its three coordination mechanisms to integrate sustainable development into its policies. However, both the Cardiff process and the Sustainable Development Strategy have been criticised for virtually ignoring the external dimension of EU sustainable development (Fergusson *et al* 2001; Opoku 2003; Coffey and Baldock 2003; Wilkinson *et al* 2002), as has the Lisbon process, which has been charged with reviewing the progress of these two mechanisms (Coffey and Baldock 2003). This paper focuses on the third mechanism, IA. In particular, the extended IAs produced for Commission policy proposals in 2003 and 2004 will be evaluated to determine the extent to which the impacts of EU policies beyond its own borders, specifically in developing countries, have been considered.

The next section of this paper outlines the literature on policy coordination within the EU focusing particularly on the difficulties that the EU system of governance has with coordination and the role of networks in achieving greater coordination. The methods used to evaluate the inclusion of the external dimension into the IAs will be outlined in section three. The results of this analysis will be set out in section four and proceeded in section five with a discussion of whether the IAs studied adequately consider the external dimension. Finally, the conclusions in section six will discuss what actions may improve the effective functioning of this policy coordination mechanism in relation to the consideration of external impacts and coordination in the EU in general.

2. Policy Coordination in the EU

Barriers to Coordination within the EU

The EU political system has a number of unique characteristics that pose significant coordination problems. First, the multi-level nature of EU governance i.e. (local, national and EU levels) “stretches considerably coordination requirements” as coordination must operate on many different levels involving both horizontal and vertical coordination (Peters and Wright 2001, 157). Second, the constantly evolving

nature of the EU has expanded the scope, variety and depth of the EU agenda. “Coordination was clearly much easier when the agenda was restricted to customs union, parts of energy policy, competition policy, agriculture and commercial policy” (Peters and Wright 2001, 159). Third, the EU is institutionally and procedurally complex and lacks a clearly defined separation of powers and responsibilities (Kohler-Koch and Eising 1999: in Kassim 2003a). Legislative power is shared by the Council and the European Parliament and executive authority is spread between the member states and the Commission. In addition, EU policy processes are unusually open involving a multiplicity of actors, including representatives of regional and local authorities, and a host of lobbyists (Kassim 2003b). Finally, “Brussels is a highly fragmented universe” (Peters and Wright 2001, 159). Intra and inter-institutional interactions take place in a universe of permanent and ad hoc committees and subcommittees. Each institution is internally differentiated and has its own methods, procedures and culture, exercises varying degrees of power, and commands different resources (Kassim 2003b). This institutional fragmentation of the EU institutions leads to strongly pronounced sectoralisation (Kassim 2003a). Although this is also a feature of domestic policy making “the extent and nature of these problems in Brussels is of a different order” (Peters and Wright 2001, 158).

Strategies to Achieve Coordination

The literature identifies three dominant strategies to achieve coordination: hierarchy, markets and networks (Peters 1998; Peters and Pierre 2003; Peters 1997). Coordination through top down hierarchy is not in keeping with the new ethos of governance in the EU which stresses participation and decentralisation. Similarly the ‘invisible hand’ of coordination through markets is also not a viable option at EU level, at least in terms of environmental coordination. Member states continue to resist the Commission’s attempts to develop EU competence over matters of environmental taxation (i.e. coordination by the market) mainly for domestic political reasons (Lenschow 2002). Therefore, almost by default, the EU now finds its self more and more reliant on network-type solutions to Environmental Policy Integration (Schout and Jordan in press). This strategy of coordination is evident in the EU’s 2001 White Paper on European Governance (CEC 2001b). Networks are maintained voluntarily based on shared values, trust, solidarity or consensus. It has been suggested that “in relying on trust collaboration, networks are more likely to achieve

coordination between conflicting interests than either hierarchies or markets” (Peters and Pierre 2003,595). The network perspective also has the advantage of being open to the role of non-governmental organisations (NGOs) and so is in line with the recent focus on governance (Peters 2003).

Networks and Impact Assessment

The relevance of policy networks to the EU is widely recognised (Christiansen 2001; Metcalfe 2000, although see Kassim 1994). However, according to Metcalfe (2000, 828) the “effectiveness of networks depends on the ability and willingness of a variety of organisational actors, public and private, to work together”. It should be noted that coordination can be viewed, not as a dichotomy, but as a continuum. Metcalfe (1994) developed a coordination scale (Figure 1.) which incorporates different descriptions of coordination ranging from loose coordination to highly integrated coordination. Metcalfe’s scale can be used for comparing capacities for managing coordination (Metcalfe 1994). One of the lowest levels of coordination (level two) on this scale is “information exchange” (Metcalfe 1994). Since the scale is cumulative the higher levels of coordination require the existence and reliability of the lower ones (Metcalfe 1994). Thus, according to Metcalfe (2000,831) “higher levels of coordination function badly and become overloaded if there is a lack of confidence in the reliability of lower levels”.

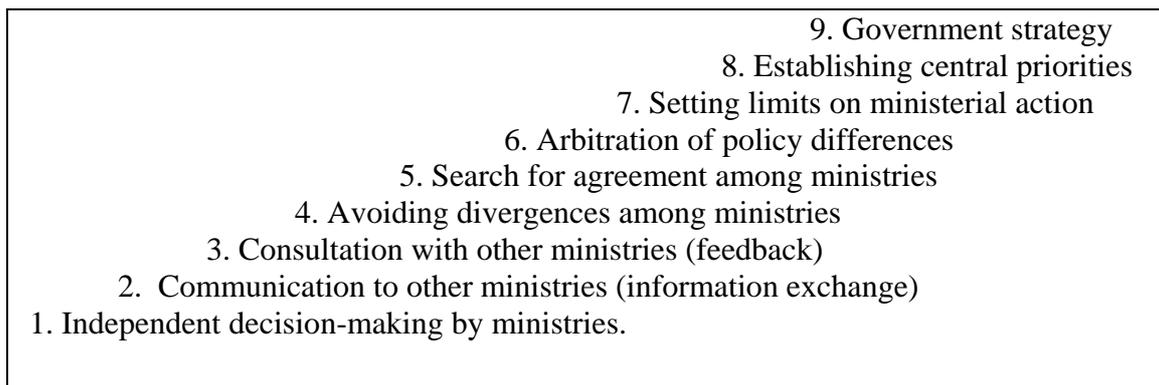


Figure 1. Metcalfe’s (1994) Policy Coordination Scale

The IA procedure is anticipated to be a tool for this type of information exchange between interested parties. Therefore, the IA procedure is an attempt by the Commission to achieve policy coordination, specifically coherence, through a network strategy. (Peters (1998) describes incoherence as “when the same clients

have different goals and requirements”).) For coordination to take place it is vital that all interested parties are at least kept updated on what issues are arising and what plans there are to deal with these issues. Without this level of cooperation then coordination cannot begin to take place as there is no platform on which to discuss and negotiate the conflicts of interest which are inevitable if policy incoherence is to be avoided.

It is clear that IA is also a ‘bottom-up’ tool which aims to join interested parties together in a network with minimal hierarchical control from the Commission itself. Schout and Jordan (in press, 3) suggest that “so far the governance debate in the EU has been based on the – often implicit – ideological assumption that networks are essentially self-steering”. However, EU governance with its trans-national and supra-national characteristics is a “too difficult a challenge for the EU to rely entirely on an arms-lengths approach to network management” (Schout and Jordan (in press, 3) especially in the case of complex cross-cutting policy challenges such as sustainable development.

3. Methods of Analysis

This research employs a content test approach which is an ex-ante test (made before the proposed policies have been carried out) of the material contained in the assessment. In addition, this study employs an extensive approach, as employed in content tests of Strategic Environmental Assessments by Fischer (2002), Regulatory Impact Assessments by Hahn *et al* (2000) and Environmental Impact Assessments by Lee *et al* (1999). Essentially this involves the use of a check list (set of criteria) to determine whether the impact assessments contain certain items or not. The advantage of this extensive approach is that it is more reproducible than a detailed critique by experts but it cannot identify some critical issues relating to quality (Hahn *et al* 2000).

The IA Guidelines explicitly identify ‘external impacts’ of policies as needing consideration in an example of the reporting format that should be followed by all extended IAs (CEC without year, 24). To evaluate the extent to which the IAs have complied with this requirement, an evaluation framework was developed (Figure 2.).

Criteria 1-7 were based on the ‘best practice’ instructions for IA content given in the IA Guidelines, such as “ *Problem Identification*: has the consideration of the initial issue or problem in the policy area taken into account any relevant external considerations?”. Criteria 8 and 9 were based on similar criteria used by Fergusson *et al* (2001) in an evaluation of Cardiff Strategies, such as checking the consideration of relevant international agreements. The scoring method used for the criteria is presented in Figure 3. It is hoped that by explaining the content criteria and scoring method, and also presenting the main findings qualitatively, that the inevitable level of subjectivity in this research will be reduced. All 21 extended IAs for 2003 and all 20 extended IAs available in English on the Commission website¹ in 2004 (up to the end of October 2004) were analysed.

1. *Problem Identification*: has the consideration of the initial issue or problem in the policy area taken into account any relevant external considerations?
2. *Objectives of the proposal*: does the objective of the policy take into account external considerations?
3. *Policy option*: has an adequate range of policies been considered including those which would ameliorate any deleterious external impacts?
4. *Policy impacts*: have the external social, economic and environmental impacts on countries outside of the EU been considered?
5. *Monitoring*: do the plans for monitoring the potential impacts of the policy include monitoring any external impacts?
6. *Stakeholder consultation*: have developing countries, development NGOs or DG DEvelopment been consulted where this would be relevant? Where any views obtained taken into account in the policy proposal?
7. *Preferred policy choice*: did consideration of any external impacts contribute to the final choice of preferred policy?
8. *Reference to international policy agenda*: were relevant international agreements considered, such as the Kyoto Protocol and the Johannesburg Plan of Implementation.
9. *Reference to EU external dimension documents*: were relevant documents that discuss the EU’s position on external impacts and goals considered.

Figure 2. Criteria used for the evaluation of Extended Impact Assessments

¹ In August 2004 the Commission launched a new IA website where all IA extended reports can be downloaded at: http://europa.eu.int/comm/secretariat_general/impact/practice.htm [accessed on 13/11/04]

0. *No mention*: the criterion has not been addressed at all i.e. the external dimension has not even been mentioned.
1. *Little attention*: the criterion has been mentioned in passing only. The majority of issues remain untouched.
2. *Unsatisfactory*: the criterion has been addressed to some extent but in an unsatisfactory manner i.e. using selective logic or entirely ignoring many significant issues.
3. *Satisfactory*: the criterion has been well addressed, i.e. using sound logic and most significant areas discussed, but there are still some omissions or inadequacies.
4. *Good*: the criteria has been addressed well and extensively with no important tasks left incomplete.

Figure 3. Scoring Allocation for Evaluation Criteria

4. Evaluation of Extended Impact Assessments

In general, the level of consideration of the external dimension was extremely low (Figure 4.). Eighteen of the 41 IAs² did not make any reference at all to the external dimension. Another 13 IAs³ only made minimal references to the external dimension with scores of five or below. In the majority of cases it is unlikely that their corresponding policies actually had significant external impacts, though only four of the IAs⁴ explicitly explained this (in at least one case this claim was questionable⁵). In contrast, there were three IAs⁶ with extremely high scores but these IAs were for policies entirely focused on countries outside the EU by the nature of the policy proposal and so necessarily considered the external dimension by default. The seven remaining IAs were for more internally focused policies but which still had significant

² Sex Discrimination (CEC 2003b), Unfair Commercial Practices (CEC 2003c), Electricity Supply (CEC 2003d), Safe and Intelligent Vehicles (CEC 2003e), Ground Water (CEC 2003f), Digital Broadcasting (CEC 2003g), Employment Strategy (CEC 2003h), Internal Market (CEC 2004a), Equal Opportunities (CEC 2004b), Environmental Standards (CEC 2004c), Fisheries Agency (CEC 2004d), eEurope (CEC 2004e), Capital Adequacy (CEC 2004f), Media (CEC 2004g), Digital TV (CEC 2004h), Agricultural Fund (CEC 2004i), Financing Natura (CEC 2004j), Reinsurance (CEC 2004k).

³ Batteries (CEC 2003i), Sole Stocks (CEC 2003j), Hake Stocks (CEC 2003k), Immigration (CEC 2003l), Energy Networks (CEC 2003m), Transport Network (CEC 2003n), Design Protection (CEC 2004l), Culture (CEC 2004m), Environmental Health (CEC 2004n), INSPIRE (CEC 2004o), Community Rail (CEC 2004p), Criminal Proceedings (CEC 2004q), Refugee Fund (CEC 2004r).

⁴ Batteries (CEC 2003i), Sole Stocks (CEC 2003j), Hake Stocks (CEC 2003k), Immigration (CEC 2003l).

⁵ Immigration (CEC 2003l).

⁶ (Human Rights) (CEC 2003o), (Mediterranean) (CEC 2003p), Importing Timber (CEC2004s).

external impacts. These achieved scores of between six and 19 and will be discussed in more detail below.

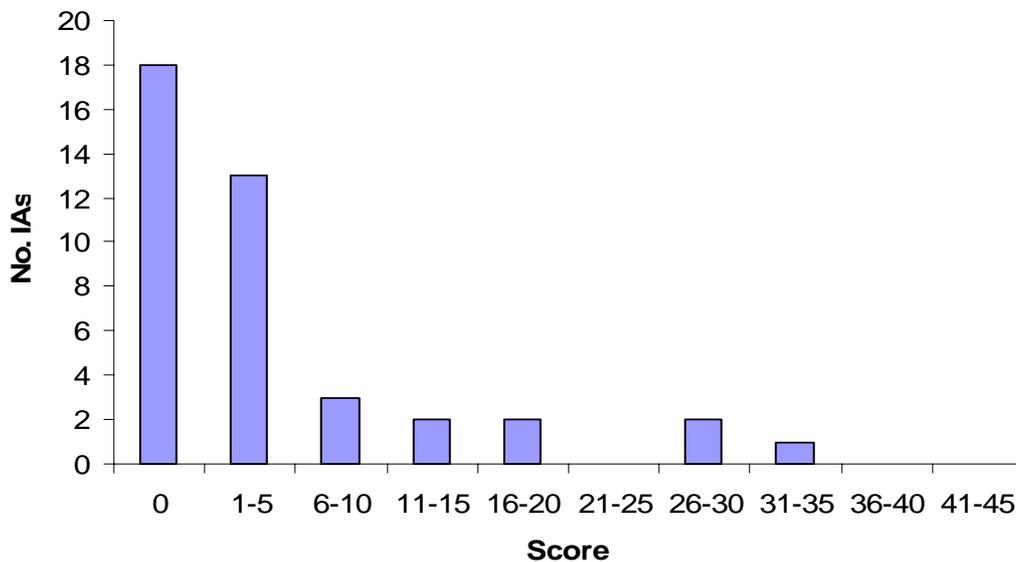


Figure 4. The Distribution of Scores for the Extended IAs

Sugar

Of the more ‘internally’ focused EU policies, but which also had a significant external dimension, the IA of the reform of the Sugar Regime (Sugar) (CEC 2003q) showed evidence of the most consideration of this dimension although, even this IA did not score an average satisfactory score of 27 (total score of 19; Figure 5.). The problem identification criticises the state of play of the current sugar regime for distorting the global sugar market by subsidising the export of surplus EU sugar production (CEC 2003q,12). It also recognising that only a few African Caribbean and Pacific (ACP) countries are benefiting from zero-duty and guaranteed-price quotas to the EU under the Sugar Protocol (CEC 2003q,10). In contrast, the objectives of the policy options are “directly inspired by the objectives in the most recent reforms of the Common Agricultural Policy”, which is notoriously inward looking (CEC 2003q,14). Therefore, the objectives of the policy proposals do not consider reducing the negative impact on developing countries. Instead, the objectives are aimed at making the “sector competitive and able to stand up to international competition” (CEC 2003q,14). Thus constrained by existing policy, only the priorities of the lead Directorate General (DG), Agriculture, set the agenda.

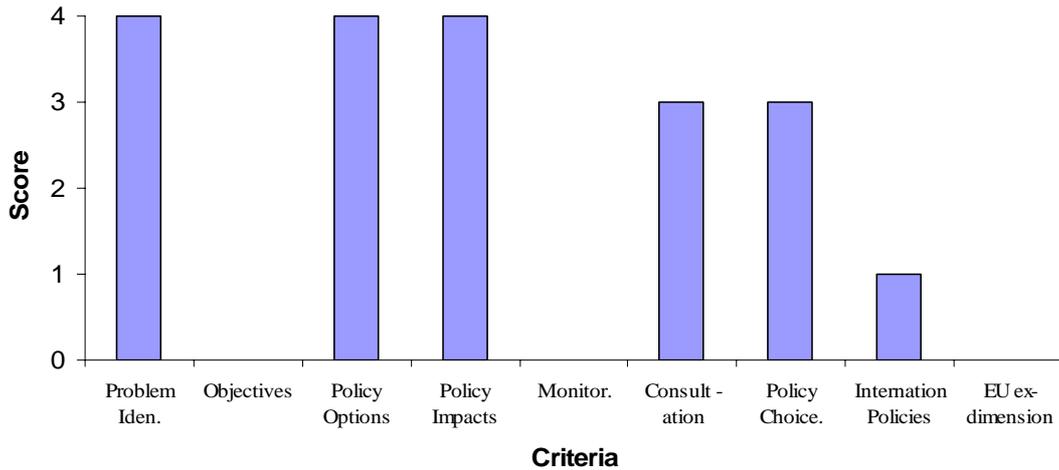


Figure 5. ‘Sugar’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

Four policy options were assessed, ranging from maintaining the *status quo* to the liberalisation of the sugar regime through to the abolition of domestic price support for sugar beet and ending production quotas and quantitative and tariff restrictions on trade. Therefore, policy options that would normally be assumed to benefit developing countries (reduction or elimination of subsidies and trade restrictions) were assessed. The impacts of the all the options on non-EU countries were identified including the negative impact on the revenue of the ACP countries, which currently get guaranteed-price quotas. However, although the IA admits the potential positive impact of liberalisation on the economy of non ACP developing countries (which includes Brazil), it does not fully explore these impacts

This IA was developed with wide consultation. The steering group alone comprised of 14 DGs or other groups. Fair trade NGOs and ACP countries were well represented. However, non-ACP countries were not involved further leaving the impression that this element of external impact had not been fully explored. The policy choices were measured both against the stated objectives, which did not contain any consideration for the external impact but also the contributions of consulted parties included ACP countries and development NGOs.

Kyoto

This IA examines policy proposals to link Kyoto project-based mechanisms i.e. Clean Development Mechanisms (CDM) and Joint Implementation (JI) to the community's emissions trading scheme. This is a scheme where countries can supplement their domestic action to reduce greenhouse gas emissions with schemes with third countries to contribute to their compliance with part of their emissions target. The IA sets out the problem of climate change in general global terms also noting that poor people will be the most affected (total score of 18; Figure 6.). However, the specific heightened severity of the impacts of climate change anticipated in developing countries is not discussed.

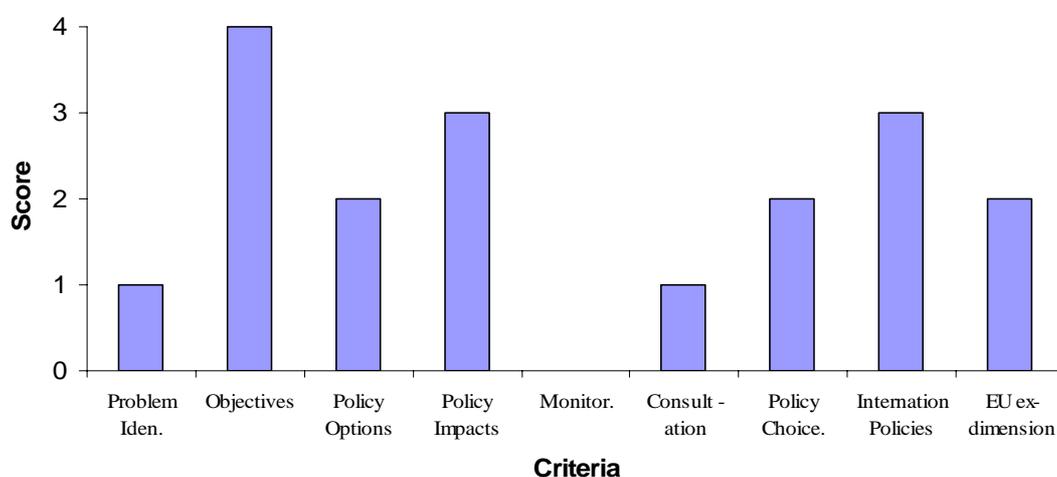


Figure 6. 'Kyoto' Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the 'external dimension' (maximum: 4, satisfactory: 3).

In contrast, the objectives show good consideration for the external dimension as they include “contributing to global sustainable development by reducing global emissions of greenhouse gases” (CEC 2003r,12) and also the “transfer of climate friendly technologies and enhancement of capacity on climate change mitigation and adaptation” (CEC 2003r,12). One of the more ‘specific objectives’ is to “encourage environmental policy integration and promote the EU Sustainable Development Strategy into external EC policies” (CEC 2003r,13). However, the policy options are firmly geared to reducing the economic cost for the EU of complying with Kyoto targets rather than maximising the effective transfer of climate change technologies and helping developing countries adapt to climate change. This is particularly evident when the IA itself admits that these schemes will be concentrated in certain areas such

as Russia and the Ukraine while other geographical areas, such as Africa, are being neglected (CEC 2003r,27).

Only positive impacts on non-EU countries were anticipated including “the transfer of clean technologies supporting sustainable development objectives for the benefit of third countries” (CEC 2003r,17). More broadly, the IA claims that the “proposal should positively contribute to the greening of Foreign Direct Investment and create synergies with other objectives such as poverty alleviation and the promotion of access to affordable clean energy” (CEC 2003r,17). Other positive impacts include creating employment in host countries and cleaner air and decreased negative health impacts (CEC 2003r,26).

The preferred policy choice involves modifying an EC Directive so that CDM and JI are linked to the Community emissions allowance trading scheme. This is an improvement on the ‘no-change’ option for developing countries as it will encourage the transfer of technology etc, but only to limited areas of the globe. It appears that the policy choice was calculated on what was best for the EU and not on consideration of the external dimension. The only consultation linked to developing countries is with DG development and did not include developing countries or relevant NGOs.

Tobacco

The IA on the reform of the Tobacco Regime entirely ignores the external impacts of this policy on the economies of non-EU tobacco growing countries (total score of 13; Figure 7.). Instead it sets out the issues which the policy aims to address by focusing on the future livelihoods of affected tobacco farmers in Greece and Italy and also on how to accommodate tobacco within the framework of a reformed Common Agricultural Policy.

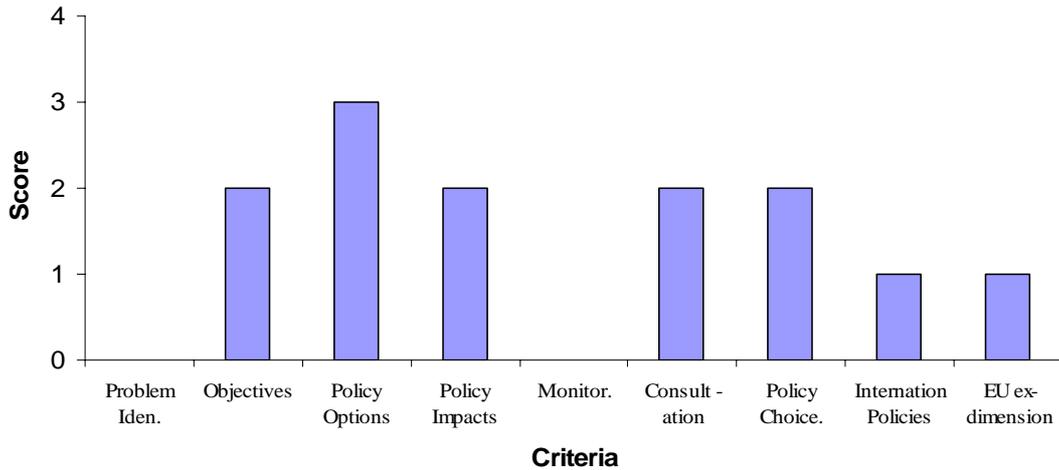


Figure 7. ‘Tobacco’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

While the IA touches on objectives that included some element of the external dimension, this is done in a vague and abstract manner. In particular, it is explained that the objectives of reforming the tobacco regime is in part “to increase global coherence between the main policies of the Union” (CEC 2003s,20). This coherence is stated as being mainly between the Common Agricultural Policy and the Public Health Policy but a later section also discusses “coherence with sustainable development objectives” (CEC 2003s,21) which it later notes have an internal and an external element (CEC 2003s22).

Two of the three policy options given would be beneficial to developing countries in terms of reducing global trade distortion for their tobacco exports. An option to decouple subsidies from production and make them non-crop specific would allow a reduction of tobacco production. Another option would gradually phase out subsidies altogether making a completely level playing field for tobacco exports from non-EU countries including some developing countries. However, in terms of potential impacts the IA perversely states that abolishing subsidies would lead to the modernisation of the EU tobacco production and “as a consequence, restrain the scope for further imports of these varieties” (CEC 2003s,32). The IA then goes on to inform us that 90% of the estimated 100 million people employed by the tobacco sector are in developing countries. Presumably the intention of this statement is to imply that full

liberalisation of the tobacco regime in the EU would risk the unemployment and impoverishment of 90 million people in developing countries.

There was a general lack of consultation from developing countries and NGOs, although DG Development was present in the steering group. In fact, the preferred policy choice (option two) was of some benefit to developing countries as it involved measures to reduce trade distortion but it may well have been the total trade liberalisation option that was most advantageous for them.

Youth

The IA for the proposal to create a “Youth in Action” programme sets out the problem identification mostly in terms of the EU but it does include an example of the positive role the youth play in the Euro-Med partnership in dialogue between peoples and cultures in this region (total score 15: Figure 8.). The objectives also have some limited level of inclusion of the external dimension as they mention voluntary activities at European and international level and dialogue and mutual understanding between young Europeans and young people in neighbouring countries. One of the ‘operational objectives’ also includes a ‘Youth of the World’ action to support projects with partner countries” (CEC2004t,19). The policy impacts more poorly consider the external dimension with only brief mention of the European Voluntary Service being “a concrete means to allow the Union to show its solidarity with some of the world’s regions” (CEC2004t, 30).

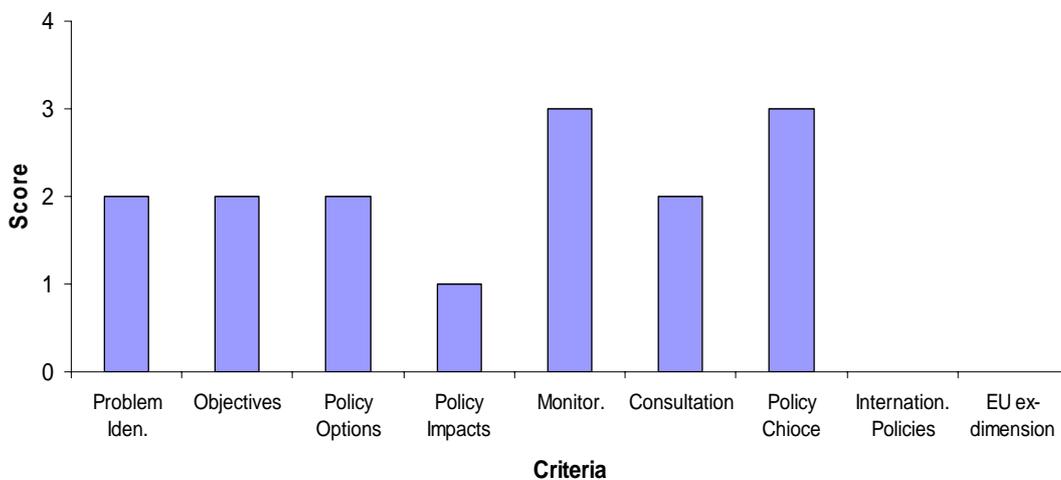


Figure 8. ‘Youth in Action’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

The monitoring for the impacts of the proposal include three indicators for the external dimension. Consultation for this IA included a working group and external evaluation on cooperation with third countries including NGOs and National agencies but no explicit representation from developing partner countries. The policy choice includes a provision the same type of activities as within the Union for neighbouring countries and targeted activities in the rest of the world (CEC 2004t,14).

Tourism

Although this IA states that its overall objective is to “promote further progress towards the sustainability of tourism in Europe and world-wide”, the IA is almost entirely focused on European based tourist destinations (CEC 2003t,2). It, therefore, ignores the impact of European tourists and tour operators on the sustainable development of countries outside the EU in its problem formulation and objectives (Total score 9; Figure 9).

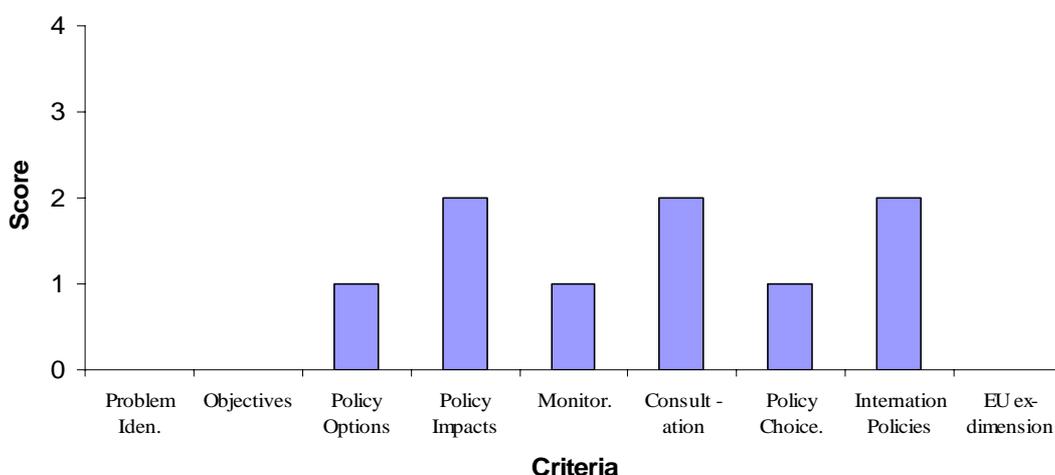


Figure 9. ‘Tourism’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

Of the four policy options offered, even the “comprehensive community policy” option missed the opportunity to address the impact of European tourists and operators outside of Europe. In terms of policy impacts, again it is stressed that the “measures to be taken.....are intended to bring equal benefits across Europe and, as far as possible world-wide” but it is difficult to see how this will occur without any

actions to control the impact of external tourism activities (CEC 2003t,25) except perhaps the sustainable tourism education proposed in all policy proposals.

Consultation included key international organisations including the WTO, World Travel and Tourism Agency, International Ecotourism Club, International Friends of Nature but not any representatives of tourism in developing countries. Within its narrow scope, the IA does take into account the international context for sustainable tourism by noting the most important objective/messages of the WSSD Plan of Implementation and the Global Code of Ethics for Tourism (COM 2003t, 12).

REACH

The IA on the Registration, Evaluation, Authorisation and Restrictions of Chemicals (REACH) initiative initially appears to have little impact on non-EU countries, least of all developing countries, and there are no references to developing countries in the IA problem identification, objectives and policy options (total score 6; Figure 10).

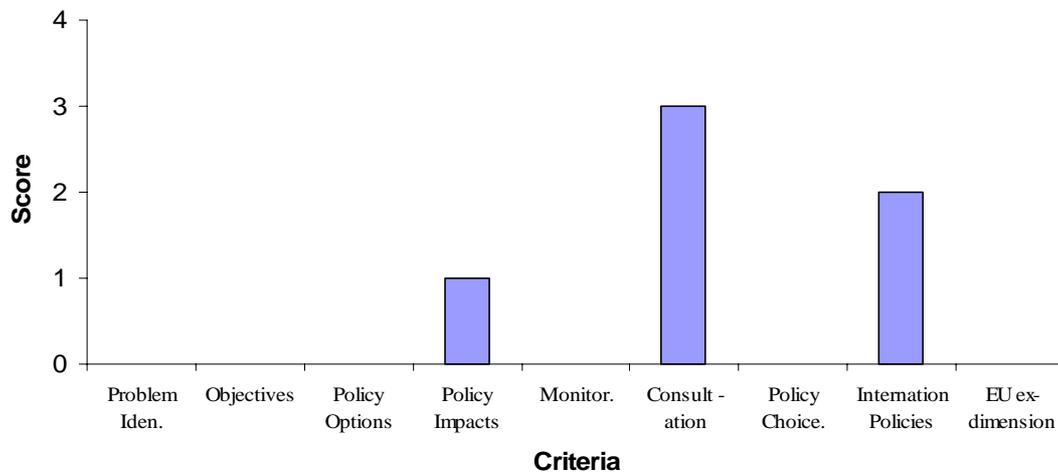


Figure 10. ‘REACH’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

However, in terms of impacts, it is noted that “importers will have to fulfil the same obligations as EU producers” (CEC 2003u,12). Therefore, this policy will have an impact on the export of chemicals to the EU from non-EU countries. However, the only discussion in the IA of this area is focused on how EU exports will remain competitive (CEC 2003u,22). In addition, the IA identifies an aspiration of REACH in “establishing itself as a new international standard” (CEC 2003u,23) in the context of

the outcome of the WSSD. This may explain the extensive consultation that was carried out, including written contributions from authorities and governments of many developing countries such as Chile, Mexico, Thailand and also some international organisations such as OECD.

Life Long Learning

The IA on the proposal for an integrated action programme in the field of life long learning briefly mentions in its problem identification that the programme has potential to involve partners outside the Union (total score 9; Figure 11). However the external dimension is not included in the objectives or the policy options.

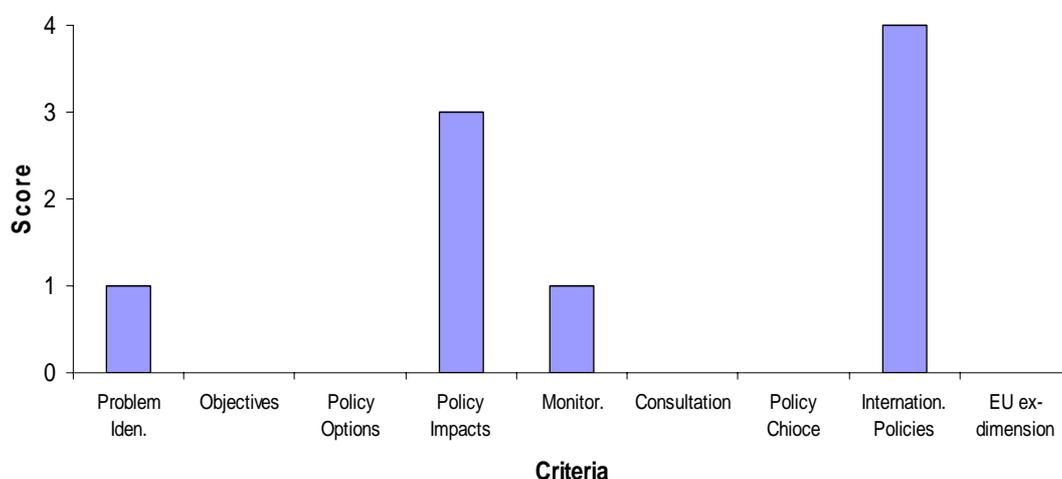


Figure 11. ‘Life Long Learning’ Extended Impact Assessment Evaluation Scores for each Criteria: assessing the inclusion of the ‘external dimension’ (maximum: 4, satisfactory: 3).

There is a section on the impacts outside the EU which states that “although the new integrated programme is a community initiative its impacts are to be felt outside the limits of the EU” (CEC 2004u,25) as there may be opportunities to cooperate with third countries and international organisations. In particular, the Jean Monnet Action has been open to universities around the world since 2001 and is currently active in 50 countries. The IA places the proposal well in the international policy agenda with a section on external coherence which includes paragraphs on related programmes by the Organisation for Economic Cooperation and Development (OECD), United Nations Educational, Scientific and Cultural Organisation (UNESCO) and the Council of Europe.

5. Do the IAs Adequately Consider the External Dimension?

The Content of the IAs

The limited consideration of the external dimension of the policy proposals in the content of the IAs studied indicates that the process is not leading to an adequate level of information flow among networks. Therefore coordination cannot be achieved in terms of the external dimension of internal EU policies. A fundamental limitation in the consideration of the external dimension in the IAs was evident right from the start. Although some IAs included a reference to external impacts in their section on possible impacts, as instructed in the IA guidelines, the majority did not include the external dimension in their introductory section which set out the problem to be tackled by the policy proposal. This therefore limited the scope of thinking in the IAs.

There was also a lack of explicit consultation in the IAs with developing countries, development NGOs or DG Development. Since the IA process is intended to facilitate information flow between actors in networks, then consultation is vital element of the process. If consultation does not take place and IAs only involve a limited number of actors within a potential network then information flow will not occur. Cross-sectoral spillovers of policy impacts and the inevitable tradeoffs that will have to be made will either not be recognised or entirely ignored because they do not suit the preferences of the DG in charge of the policy proposal.

The poor quality of the consideration of the external dimension of the IAs studied is consistent with many other aspects of the content of the IAs. In a more general analysis of all the IAs produced in 2003, Wilkinson *et al* (2004) found that none followed fully the Commission's IA Guidelines. In addition, it was found that policy options "almost always fell within the competence of responsible DGs so that options tended to reflect only incremental changes in intensity or timescale from 'business as usual'" (Wilkinson *et al* 2004,18). The report also found the range of impacts considered was limited with the most attention given to economic impacts and little attention to issues of sustainable development. When sustainable development considerations in general are being over looked, as also occurred in the Cardiff

process and the Lisbon process, it is not surprising that consideration of sustainable development outside of the EU is almost entirely absent.

The IA System

Beyond the evident lack of consideration of the external dimension of the IAs themselves, there are weaknesses in the whole IA system. These inhibit its ability to facilitate the flow of information and therefore actors are not linked within networks. First, the system lacks transparency. A list of extended IAs to be undertaken in 2003 and 2004 and the actual IAs themselves only appeared centrally on a Commission Secretariat General website in August 2004. Although some IAs appeared on individual DG websites before this date, most were highly inaccessible. This lack of transparency has been described as being ironic “in view of the fact that one of the reasons for introducing the system was to increase public and stakeholder support for, and participation in, development of Community policies” (Wilkinson *et al* 2004,9).

Second, more than just neglecting the external impact of sustainable development in the actual extended IAs, the whole IA system may be neglecting sustainable development issues. Of the 580 policy proposals listed in the Commission’s 2003 Work Programme, only 43 were formally identified as requiring an extended IA. Similarly, of the more modest 273 policy proposals listed for the 2004 Work Programme only 41 were identified. Therefore, it seems that, however poorly the IAs produced considered the external dimension of sustainable development, it is more consideration than those proposals that did not even have an extended IA. In addition, of the 43 proposals identified in 2003 for extended IAs, only 16 were completed and five additional proposals not originally selected were in fact subject to one. Although the Commission have set out criteria for selecting proposals for IAs, according to Wilkinson *et al* (2004) the list in the 2003 Work Programme was constructed by political bargaining rather than the application of any clear criteria. In addition, Wilkinson *et al* (2004, 10) found that the process of IA appeared “to be generally regarded within the Commission as burdensome, and most DGs therefore have been reluctant to ‘volunteer’ their measures”. Information flow will not be facilitated by the IA process if political bargaining can allow proposals to by-pass the process when this is deemed helpful by certain DGs.

Theoretical Analysis and Reflections

It is evident from the content of the IAs, and a brief consideration of the IA system as a whole, that the IAs are not leading to the level of information exchange within networks that is required to achieve even a low level of coordination on Metcalfe's (1994) coordination scale (Figure 1). A successful IA procedure should entail thorough consultation and consideration of all possible perspectives from different sectors of the Commission and outside actors of a problem and solution in terms of policy proposals, including the external dimension. According to Metcalfe's coordination scale, this situation would bring EU policy coordination, in terms of policy development, up to level two (information exchange) with the aim of creating a debate in which higher levels such as consultation or feedback (level three and four) can be negotiated. Since this scale is cumulative, achieving a higher level of coordination without having reached this low threshold is not possible. It is interesting to note that the EU at present is pursuing coordination both through low level mechanisms in the form of information exchange (e.g. IA) and also high level mechanisms in the form of government strategies (level nine) (e.g. the Sustainable Development Strategy) and establishing central priorities (level eight) (e.g. Commission texts (e.g. the 'external' Sustainable Development Strategy), post Rio commitments and even the EU Treaties). These ambitious mission statements remain hard to realise as they are not obviously linked to daily policy making i.e. implementation mechanisms. However, as yet there has been little attention focused on trying to connect these high level coordination ambitions with the low level coordination mechanisms.

Are Self-Steering Networks a Viable Tool?

The view of the Secretariat General is that quality control can be adequately ensured through inter service consultation and that other DGs will not accept an inadequate assessment i.e. that the networks will be self-steering. However, the extent of involvement of other DGs and the fact that the two very short IAs on fish stock recovery (9 and 14 pages) which ignored most of the Commission guidelines were nevertheless adopted by the Commission (Wilkinson *et al* 2004) seem to refute this. This insight supports the assertion made by Schout and Jordan (in press) that the Commission's preference for voluntary coordination through self-steering networks is not an adequate solution to the EU's policy coordination problems. The lack of actor

participation and information exchange evident in the IAs indicates that the IA process is not facilitating the effective coordination through self-organisation of networks within the EU. The IAs are, on the whole, being constructed within the same sectoral boundaries that characterises the Commission and have led to the present state of policy incoherence.

6. Conclusions

It is important that the IA process is improved in light of the first two years of practice (although it should be noted that there does not appear to be any recognisable framework, such as a review mechanisms, put in place to facilitate this). Specific measures to improve the IA system could include: updating the guidelines with more explicit instructions to consider the external dimension in all sections of the IA; the clarification of which aspects of the guidelines are mandatory and which are discretionary; the allocation of resources for undertaking the IAs; the clear application of selection criteria for choosing policy proposals to under go an extended IA; and also the thorough consultation of all interested parties including DGs and outside actors (especially NGOs).

On a more fundamental level, it is evident that networks may require considerably more central steering than the EU currently has anticipated. Schout and Jordan (in press) point out that effective networks require leadership, or network management (from the Commission), as a compliment to self-organisation. “This is not to say that networks are unimportant, only that in the EU they retain a strongly sectoral focus” (Schout and Jordan (in press)). Therefore, central network management will be required to compliment the bottom-up network approach to coordination. It can not be assumed that the strong sectorisation of the Commission will be overcome voluntarily without some central driving force coming from the Secretariat General and perhaps a role for DGs Environment and Development. This will include a formal mechanism for ensuring quality control of the IAs and the construction of an institutional framework within which ‘learning by doing’ can take place in practice.

On a higher level of analysis, it is evident that delivering sustainable policies within the EU is obviously more than just an issue for the Commission to address (i.e. the

focus of IAs). In fact, the IA system should be viewed as a forward thinking initiative by the Commission. While many different forms of IA have been introduced around the world, there are currently few examples that attempt to fully address sustainable development considerations in a comprehensive way. Even if the Commission was well resourced and motivated enough to collaborate in better coordination and produced more sustainable proposals (horizontal coordination), the sectoral ministers in the Council would then have to continue to defend integration during subsequent political negotiations, as would the European Parliament and the member states in which the policies would be implemented (vertical coordination). Therefore, to insure EU policy coherence it is necessary to have simultaneous horizontal and vertical pressure (Schout and Jordan in press).

Finally, it must be remembered that coordination through policy assessment is just one type of mechanism that can be employed. It could be argued that the Commission is currently relying too heavily on IA which is not able to deliver an adequate level of coordination on its own. This is both because it is being underutilised by networks within and outside the Commission (and hence is not operating effectively) and also because it alone cannot effectively tackle such as mammoth a wide ranging task. Even if IAs were operating effectively there would be a need for higher level mechanisms for the IAs to feed into both within the Commission, specifically at the College of Commissioners level, and also within the Council and the Parliament.

Peters (1997) describes an array of coordination mechanisms that governments can use to achieve coordination including the allocation of a coordinating role for the core executive and intra and inter department (DG) committees and establishing ministerial (Commissioners) posts and central agencies with a coordinating portfolio. In fact, policy appraisal approaches in general may not even be an efficient solution as similar Environmental Policy Appraisal systems introduced in EU member states such as Britain and the Netherlands and also within the EU itself have not lead to the level of coordination anticipated (Russell and Jordan 2003; Pearce 1998). Therefore, IAs are only one possible part of the large and complex solution to policy coordination required by the EU. It is clear that environmental coordination imposes a collective responsibility across many actors and institutions (Jordan *et al* 2004).

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