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Working Paper

Gearing-up governance for sustainable development: Patterns of policy appraisal in United Kingdom central government

CSERGE Working Paper EDM, No. 06-02

Provided in Cooperation with:

The Centre for Social and Economic Research on the Global Environment (CSERGE), University of East Anglia

Suggested Citation: Russel, Duncan; Jordan, Andrew (2006) : Gearing-up governance for sustainable development: Patterns of policy appraisal in United Kingdom central government, CSERGE Working Paper EDM, No. 06-02, University of East Anglia, The Centre for Social and Economic Research on the Global Environment (CSERGE), Norwich

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Development: Patterns of Policy Appraisal in
United Kingdom Central Government**

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Acknowledgements

The support of the Economic and Social Research Council (ESRC) is gratefully acknowledged. This work was part of the interdisciplinary research programme of the ESRC Research Centre for Social and Economic Research on the Global Environment (CSERGE).

Thank you to Timothy O'Riordan and David Benson who commented on an earlier draft of this paper. Of course, any mistakes within this paper are the authors' responsibility.

ISSN 0967-8875

Abstract

The United Kingdom is an international leader in the application of environmental policy appraisal (EPA). From the late 1980s until 2004, the UK's system sought to produce *ex-ante* assessments of the potential environmental impacts of different policy options. Critics maintain that it had a very limited impact on policy making activities in Whitehall departments. However, the empirical basis for these claims and the literature about EPA in general is surprisingly limited. This paper seeks to better understand what facilitates or retards EPA by looking at its use in Whitehall. It thus allows us to draw lessons for the UK's new and more integrated appraisal regime, as well as similar systems such as that now being rolled out by the European Commission. We find that the implementation of EPA was both weak and highly sectorised, and that there is an underlying resistance to policy appraisal *per se* in Whitehall. These weaknesses urgently need to be addressed otherwise the new system of integrated appraisal will not deliver all that is expected of it.

Keywords: environmental policy integration, environmental policy appraisal, integrated appraisal, regulatory impact assessment

1. INTRODUCTION

Following the publication of the Brundtland report in the late 1980s (WCED, 1987), the traditional 'end-of-pipe' command and control approach to environmental management 'face[d] a legitimacy crisis, as it seemed to impose high costs on the economic actors without producing the desired environmental improvements' (Lenschow, 2002c: 21). Brundtland therefore, sought to popularize environmental policy integration (EPI) as an alternative strategy to achieve more sustainable forms of development by placing the environment at the heart of policy making in 'non' environmental sectors (e.g. energy and transport) (Lenschow, 2002b; 2002c; Hertin and Berkhout, 2003). EPI is now seen as a 'first order operational principal' (Lenschow, 2002b: 21) for sustainable development (Lenschow, 2002a; Hertin and Berkout, 2003). There is a rapidly emerging literature which seeks to assess the importance of EPI and identify different implementing strategies (e.g. Lenschow, 2002a; Hertin and Berkout, 2003; Lafferty and Hovden, 2003; Jacob and Volkery, 2004). Also, there are many *ad hoc* empirical accounts of the strategies and tools employed by different jurisdictions to implement EPI (e.g. Lenschow, 2002a; Jacob and Volkery, 2004), including the UK (Jordan 2002). However, there are still surprisingly few in-depth empirical studies of particular tools and strategies from which more general lessons can be abstracted.

Recently, one tool in particular has emerged as a popular means of pursuing EPI in policy making, namely (environmental) policy appraisal. The popularity of *ex-ante* policy appraisal can be seen in the UK's adoption of Regulatory Impact Assessment (RIA), which assesses the impact of regulation on business, charity or the voluntary sector (Cabinet Office, 2003, para.1.1), as well as the EU's Impact Assessment (IA) regime, which analyses the economic, environmental and social impacts of a proposal (European Commission 2003: p.7). These developments have, in turn, led to more 'fundamental questions...being asked, by theorists and practitioners, about the nature of appraisal and its role in the political process' (Owens, *et al.*, 2004: 1944). But thus far (and in marked contrast to project-level appraisal (e.g. Environmental Impact Assessment)), the use of appraisal in day-to-day policy making contexts is a relatively under-researched area. The reasons for this neglect are arguably two-fold: first, many policy appraisal regimes are comparatively new meaning there has been little opportunity for longitudinal research (e.g. the UK's RIA system and the EU's IA system date from 1997 and 2003 respectively); second, policy appraisal tends to be more opaque than other forms of appraisal, not least in the UK. Consequently, 'a better understanding of [appraisal] processes requires further research, particularly well-designed longitudinal work involving retrospective and real time studies of appraisal in practice' (Owens *et al* 2004: 1959).

This paper seeks to address this gap in the literature by examining the use of (environmental) policy appraisal in United Kingdom (UK) central government, in order to derive lessons for similar systems in other jurisdictions, as well as for the development of EPI systems more generally. Its principal focus is on *ex-ante* environmental policy appraisal (EPA), which was formally introduced, along with a raft of other EPI mechanisms and tools, in 1990 (DoE, 1990). The UK's system arguably provides a crucial case study of appraisal in general. Not only is it one of the oldest systems (it dates back to the late 1980s, thus allowing detailed longitudinal research), but it also strongly influenced the design of the government's more high-profile Regulatory Impact Assessment (RIA) system as well as the EU's system of IA.

Until recently (see below), the UK's system of EPA was a Department for Environment Food and Rural Affairs (DEFRA)¹ sponsored initiative. It was, until its demise in 2004, promoted as a tool through which all Whitehall departments should assess the potential environmental

impacts of their policy-making activities (DoE, 1991; DETR, 1998), i.e. to generate information on environment-related spillover effects on cognate sectors. In 2004, it was superseded by a more integrated and cross-government form of RIA, under the leadership of the Cabinet Office. This new form of RIA is meant to assess for regulatory as well as economic, societal and environmental impacts of new policy proposals (ENDS, 358: 48; EAC HC 1259, session 2004-2005: 4). The change was in line with the Labour government's commitment to achieve 'better regulation', notably by rationalising no less than eleven separate policy appraisal systems (see the Cabinet Office's Policy Makers' Checklist (1999b)) into a single, more integrated form of appraisal (Cabinet Office, 1999a: para. 12).

There are a number of partial, secondary and anecdotal accounts of the use of EPA in UK central government (e.g. EAC HC 92, session 1998-1999; HC 326, session 2001-2002; DETR 1997; Pearce, 1998; Young; Hanley 2001; Jordan, 2002a; Ross, 2005). These suggest that EPA struggled to have an impact across Whitehall departments irrespective of the political party in power (i.e. the Conservatives (1990-1997) and Labour (1997-2004)). In particular, it was claimed that individual departments were left to pursue EPA independently with insufficient central steering (HC 92, session 1998-1999, para. 12). Consequently, it was suggested that in spite of a number of positive reviews by the OECD (2001; 2002), very few appraisals were ever produced. Moreover, those that were failed to conform to best practice guidance (e.g. DoE, 1991; DETR, 1998) (EAC HC 426-I, session 1998-1999, para. 54; Jordan, 2002a; Ross, 2005).

On the face of it, these findings are rather puzzling. The UK has, after all, a relatively long history of using EPA. It is very much a lynchpin of the UK's domestic EPI system; it is also something which the UK has tried to export to other jurisdictions, most notably the EU (Jordan 2002). Unfortunately, the existing literature has not fully uncovered or sought to explain the actual patterns of EPA in the UK. A number of causes have, however, been identified. They can be regarded as proximate as they are immediately associated with the poor output and quality of EPAs. Interestingly, they are predominantly offered by environmental economists, many of whom advised on the design of EPA in the first place. Pearce (1998), for example, claims it was hampered by ignorance and 'substantial ambivalence' towards monetising the environment in some departments (Pearce, 1998: 92). He also argues that the guidance on EPA was too inflexible, being better suited to *ex-post* forms of project assessment, rather than *ex-ante* strategic policy appraisal (i.e. it tended to 'crowd out' flexible and responsive policy making) (Pearce 1998: 92-94). Meanwhile, Helm (1998: 10) somewhat mischievously claims that EPA was not used as it 'would probably not [have] support[ed] the outcomes ministers [had] chosen' beforehand. Both Helm (1998: 9) and Hanley (2001: 9) argue that there was little incentive for departments to appraise as it is inherently time consuming and expensive. Finally, the Parliamentary Environmental Audit Committee (EAC) has suggested that EPA was held back by poor leadership from the centre of government (e.g. the Prime Minister, Ministers of State, etc) (HC 426-I session 1998-1999, para. 12; HC 341, session 1999-2000, para. 21).

These accounts seem plausible, but they do not use a consistent empirical approach to: fully record and assess the actual patterns of EPA use; identify who the practitioners were and tap their perceptions about the (non) use of EPA; and more deeply investigate the putative drivers of these patterns or explore some of the potentially underlying processes, which might conceivably affect how all forms of appraisal are applied across Whitehall. This paper, on the other hand, seeks to offer a more coherent and grounded empirical understanding of the promise of and potential limits to the use of EPA in Whitehall by drawing on original empirical data collected from around thirty in-depth interviews with government officials and external experts, coupled to extensive primary and secondary documentary analysis. Elite interviewees were carefully selected for their expert knowledge on and experience (Richards, 1996) of: facilitating and auditing EPA within their department; managing the

cross-cutting implementation of EPA; scrutinising the government's EPI performance; producing appraisal guidance; or providing EPA training. The interview data is primarily supported by the content testing (Harrington and Morgensten, 2000: 5-9) of published EPA documents against specified DEFRA best practice steps (DETR, 1998). Arguably, this overall richer empirical stock of knowledge provides a better basis for drawing lessons with respect to the UK government's more integrated system of RIA, as well as similar appraisal regimes such as those in the European Commission, the Netherlands and elsewhere (see: Jacob and Volkery, 2005: 301).

The remainder of this paper unfolds as follows. Part two documents empirically the patterns of EPA use from the late 1980s until 2004. Part three provides an in-depth examination of the putative proximate and underlying causes of these patterns. Part four concludes the analysis by drawing lessons for the UK's experience with RIA as well as the design of its wider EPI system.

2. PATTERNS OF ENVIRONMENTAL POLICY APPRAISAL IN THE UNITED KINGDOM

Appraisal in theory: best practice guidance

According to the last set of best practice guidelines produced by the environment department (DETR, 1998), an EPA should have been carried out:

'...whenever a policy or programme – including any under negotiation in the EU – [was] likely to have a significant effect on the environment. An effect will be significant if it is likely to make more than a negligible effect on various aspects of the environment'. (DETR, 1998: para. 5.1)

The guidance recommended that, as a first step, a policy should have been screened to ascertain whether a full appraisal is needed (*ibid*: para 5.1). If the screening revealed that a policy was likely to have a significant and possibly irreversible effect on the environment, a full appraisal was required. This should have been undertaken at the earliest opportunity and ideally run alongside the policy as it developed (*ibid*: para. 5.5) (i.e. it should be an *ex-ante* assessment). Beyond strongly recommending that costs and benefits should be quantified, the guidance did not explain the techniques that could have been used (e.g. Cost Benefit Analysis (CBA), multi-criteria analysis, strategic environmental assessment, etc). It did, however, refer the reader to earlier best practice documents (DoE, 1991) and the Treasury's Green Book on appraisal (HMT, 2002), which detail these and other similarly 'technical-rational forms of appraisal' (Owens, *et al.*, 2004). Since EPA's introduction in 1990, the guidance consistently prescribed a set of nine generic steps, which will be used later in this paper to assess the quality of the EPAs that were prepared (see Figure 1 below). Crucially, it was the responsibility of the lead department to conduct the appraisal *not* DEFRA or the Cabinet Office (although the guidance recommended that technical experts in the environment department be consulted).

1990-1997: appraisal under the Conservatives

Having now explored the EPA ideal, how well did the reality live up to it? In 1992, the then environment minister, Michael Heseltine, boasted that 'the UK has some of the most sophisticated machinery in the world for integrating the environment and other policies' (ENDS, 209: 3). His faith in the UK's system was so strong that he even urged the European Commission to apply a similar form (Jordan, 2002a: 45).

How well grounded was his enthusiasm? Documenting the actual use of EPA under the Conservatives proved to be a much more difficult task than we had imagined. There are two reasons for this. First, until relatively recently the process was not very transparent (i.e. there was no requirement to publish EPAs, very limited parliamentary scrutiny and virtually no self reporting by departments). Second, some departments may have followed Whitehall protocol and discarded any EPAs they produced shortly before the change of administration in 1997. Thus a detailed record of the period prior to 1997 is difficult to create, hence our reliance on secondary accounts.

There is plenty of evidence to suggest that the EPA regime, along with many of the other EPI initiatives set up by the 1990 White Paper, was not very well implemented (e.g. see: ENDS, 200: 15-17; CPRE, 1996; Jordan, 2002a; Ross, 2003, DETR, 1997). Answers to parliamentary questions revealed that no department could give evidence of having conducted a single EPA (Young, 2000: 252). A DEFRA-commissioned report on EPA observed that departments were conducting policy appraisals 'according to the spirit, if not the letter' of EPA guidance, but it found plenty of room for 'more comprehensive systematic consideration of the environmental impacts of policy' (DETR, 1997: 32). Both Pearce (1998:

93) and Hanley (2001: 105-107) suggest that a number of environmental policies had been informed by cost-benefit studies between 1990 and 1997. Unfortunately, we could not obtain any of these to assess their quality. The other possible environmental appraisals appear to be either *ex-post* assessments linked to projects and programmes or are small parts of larger policies. Thus they are probably not strategic or policy orientated enough to be viewed as EPAs.

1997-2004: appraisal under Labour

Shortly after being elected in 1997, the Labour Prime Minister Tony Blair pledged at a high-profile UN conference (Rio+5) to 'make the process of government green'. He added that:

'The environment must be integrated into all our decisions, regardless of sector. [It] must be in at the start, not bolted on later'.

This injection of Prime Ministerial support was followed by a strengthening of the processes set-up by the Conservatives. Critically, in relation to EPA, a new special cross-departmental Sustainable Development Unit located in DEFRA was created, which amongst other things, championed EPA across Whitehall (Jordan, 2002a: 46). In addition, a newly formed Parliamentary Environmental Audit Committee (EAC), was established to scrutinise the governments' performance on sustainable development (Jordan, 2002a: 46). It targeted EPA in its early investigations. Furthermore, the guidance on EPA was reviewed, and supplemented with new advice (DETR, 1998). Finally, a cross-departmental reporting process by so-called departmental Green Ministers was established to provide annual accounts of the government's progress on EPI and EPA; a commitment was also made to publish EPAs (The Green Ministers' Committee, 2000: 29). Together, these changes have helped to shed much more light on the implementation of EPA, making it easier for us to scrutinize the process.

The formal systems and documentation used by departments to support the production of EPAs until 2004 are outlined in Table 1. The majority of departments had no internal procedure to routinely screen policies for environmental impacts, and only three made this mandatory. This is despite Green Ministers (1999: para. 3.5) having declared that 'all new policy proposals had to be screened for environmental impacts'. Table 1 also demonstrates that there was no single consistent body of guidance. Rather, departments developed their own guidance based on that published by DEFRA (DoE, 1991; DETR, 1998). This situation neatly demonstrates the presence of sectorised thinking and acting, which is of course the very thing that EPI tries to overcome.

Table 1 reveals that the majority of departments had a preference for conducting EPAs internally, with only six indicating that they would consider employing consultants. Of these, only the Departments for Transport, Trade and Industry, and Defence had actually conducted EPAs; the rest produced none whatsoever. In all, we were only able to uncover two externally produced EPAs.²

Although most departmental officials told us that they preferred to conduct appraisals internally, Table 2 illustrates that many departments did not have systems of internal training in place to support this. In their first report on the implementation of EPI in the UK, the EAC argued that DEFRA's EPA guidance (DETR, 1998) 'need[ed] to be reinforced by the training of the staff concerned' (EAC HC 517-I, session 1997-1998: para. 95) and expressed its disappointment that this was not already commonplace. All the officials that we interviewed said they had heard about EPA training courses run by the National School of Government. But between 2001 and 2003, only 14 people had attended, only eight of whom were from central government departments.³

Table 1: Departmental environmental policy appraisal systems and guidance in 2004 (based on interview data unless otherwise stated)

Department	Mandatory Screening Requirement	Guidance Used		Conducted Internally/ Externally	Training Provided
		Screening	Full Appraisal		
Customs and Excise	-	-	-	-	Seminar given to policy makers ¹
DEFRA	Yes	Internal screening table	Official guidance (DoE 1991; DETR 1998). IPA ²	Internally	None
Department of Trade and Industry	No	Formal minuting of meetings ⁵	Internal qualitative	Internally but externally when lack expertise	None
The department for Transport	Semi mandatory	Internal IPA ²	Internal IPA ²	Both	Power Point Demonstration on IPA (and courses on policy appraisal and evaluation ¹)
Inland Revenue	Yes	Internal IPA ²	Internal IPA ²	Internally	In development ¹
The Ministry of Defence	No	Internal	IPA ² pilot	Both	RAF course
The Treasury	N/A ⁴	N/A ⁴	N/A ⁴	N/A ⁴	N/A ⁴
Cabinet Office	No	None	None in place	N/A	None
Department of Culture, Media and Sport	No	None	Provided by Consultants	Externally by Consultants	By consultants
Department for Education and Skills	-	-	-	-	Sustainable development training
The Department for International Development	Yes for every intervention over £1 million	Internal screening note ⁵		Externally by Consultants	Internal Course
Department of Health	No	Internal 10 point checklist. IPA ² piloted in some areas.	Internal (developed using DETR 1998 guidance). IPA ² pilot.	Internally	No formal training but guidance available to all staff via Intranet.
Department of Works and Pensions	No	DETR 1998 ⁵	DETR 1998 ⁵	Externally	Internal ⁶
Foreign and Commonwealth Office	-	Internal ¹	Internal ¹	-	-
Home Office	No	Internal, policy maker's checklist	None	Internally	None
Lord Chancellors Department	-	-	-	-	-
Crown Prosecution Service	No	None	IPA ² made available to senior policy makers	Internally	None

The Departments shaded in grey are those who had conducted and published EPAs (see Table 2)

¹ Based on information submitted for the first Sustainable Development in Government Report (DEFRA, 2002: Ch. 2, part 2).

² IPA = Integrated Policy Appraisal toolkit (Developed by the Department of Transport, DEFRA and the Department of Health), which was being piloted at the time of research and was subsequently abandoned in favour of integrated RIA.

⁴ Customs and Excise conducted EPAs for the Treasury.

⁵ New guidance was being developed.

⁶ With help from the civil service college.

Even though most departments had some system in place to facilitate the production of EPAs, Table 2 demonstrates that the vast majority of EPAs were produced by DEFRA, the main advocate of EPI and EPA. In other words, neither EPI nor EPA appeared to have succeeded in making inroads into cognate sectors. To put the 62 EPAs conducted under Labour (see Table 2) into context, EPA production appears low compared to the quantity of RIAs conducted over a similar period (see above for a description of RIA). As Table 3 illustrates, between January 1997 and December 2004, 631 RIAs were submitted to the Cabinet Office's Better Regulation Executive – i.e. ten times more than the number of EPAs produced. Furthermore, unlike EPA, the RIAs were spread more evenly across all Whitehall departments rather than just a select few, although clearly, as would be expected, more were produced by the bigger departments. Therefore, while the onus for producing both RIAs and EPAs was on the team responsible for developing a specific policy, officials seemed more likely to engage with the Cabinet Office-backed initiative.

Table 2: Number of published environmental policy appraisals identified, under the Labour government: May 1997 – Dec 2004*

Department	Number of EPAs
DEFRA, Dept. for Transport and the Office of the Deputy Prime Minister	48
Department of Trade and Industry	6
The Treasury	3
Inland Revenue	3
Joint DEFRA, Treasury and Customs and Excise	1
Ministry of Defence	1
Total	62

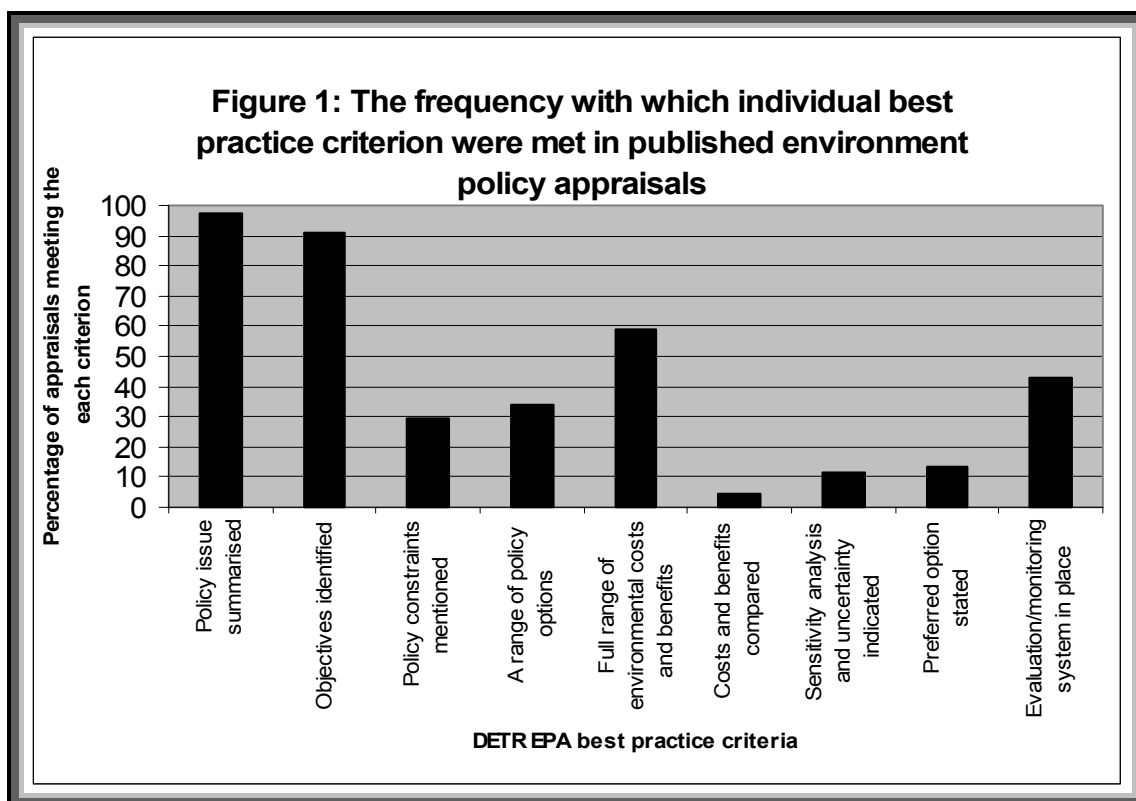
*This is not a necessarily complete record, as it merely represents those provided on a list from DEFRA and others that were uncovered during this research.

Table: 3 The number of Regulatory Impact Assessments conducted between Jan 1999- Dec 2000 and the number reported to the Regulatory Impact Unit between Jan 2001 – Dec 2003

Department	Number of RIAs Conducted Jan 1999- Dec 2000 ¹	Number of RIAs reported to the RIU Jan 2001 – Dec 2004 ²
DEFRA, Dept. for Transport and Office of the Deputy Prime Minister	94	134
Dept. of Trade and Industry	85	91
Inland Revenue	14	36
Home Office	23	23
Dept. of Health	20	31
The Treasury	5	14
Dept. of Works and Pensions	9	12
Dept. for Education and Skills	6	11
Customs and Excise	2	11
Lord Chancellors Dept.	1	6
Dept. of Culture, Media and Sport	0	2
Cabinet Office	0	1
Total	259	372

¹ Source: Appendix 4 of the National Audit Office Better Regulation Report (2001)
² Source: The Better Regulation Executive, Cabinet Office

If the number of EPAs produced was disappointingly low, what about their quality? The following analysis was carried out on 46 of the 62 EPAs displayed in Table 2. Figure 1 presents the frequency with which the individual DEFRA best practice criteria were met, as outlined in best practice guidance (DETR, 1998). Crucially, none of the analysed appraisals appeared to meet all 9 criteria; the average was just 3.8 per EPA. Only a strategic environmental assessment of the Ministry of Defence's Strategic Defence Review came close to meeting all of the criteria. As Figure 1 demonstrates, the criteria which were the easiest to fulfil, such as, 'outlining the policy issue' and 'stating the aims and objectives', were the most frequently met. Importantly, 40% of the analysed EPAs failed to identify a full range of environmental costs and benefits and even fewer systematically compared costs *and* benefits, which is a fundamental aspect of an EPA. An example of a key, environmentally impacting policy area is energy. The five energy related EPAs that we analysed⁴ tended to be strong on summarising the policy issue, outlining the objectives and identifying an extensive range of environmental impacts, but were weak on fulfilling the rest.



Given that the ultimate purpose of EPA is to assess different policy options, the fact that the majority of EPAs analysed assessed only one option, suggests that many were conducted in a somewhat perfunctory manner. The EAC also noted this shortcoming, commenting that 'the government is blurring the distinction between options appraisal and impact assessment (which is likely to be much more about defending decisions)' (EAC, HC 341, session 1999-2000, para. 32). This assertion is confirmed by Figure 2, which demonstrates that the vast majority of EPAs were undertaken in the later stages of the policy cycle, i.e. they did not drive the development of the policy in a manner consistent with EPI. Thus, to paraphrase the EAC (HC 426-I session 1998-1999 para. 54), the majority of the EPAs sampled appeared to be little more than after-the-event justifications that 'green proofed' pre-determined policies (i.e. they were *ex-post* assessments).

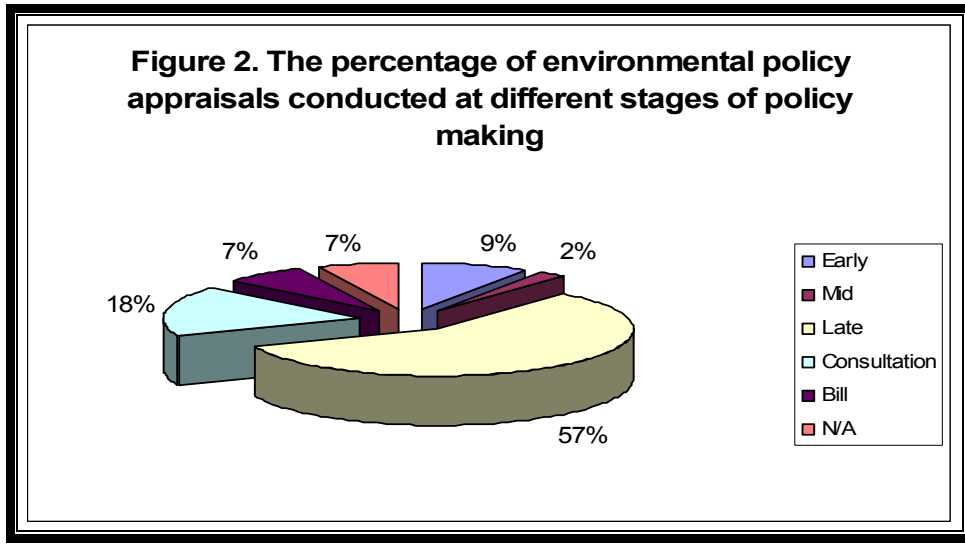
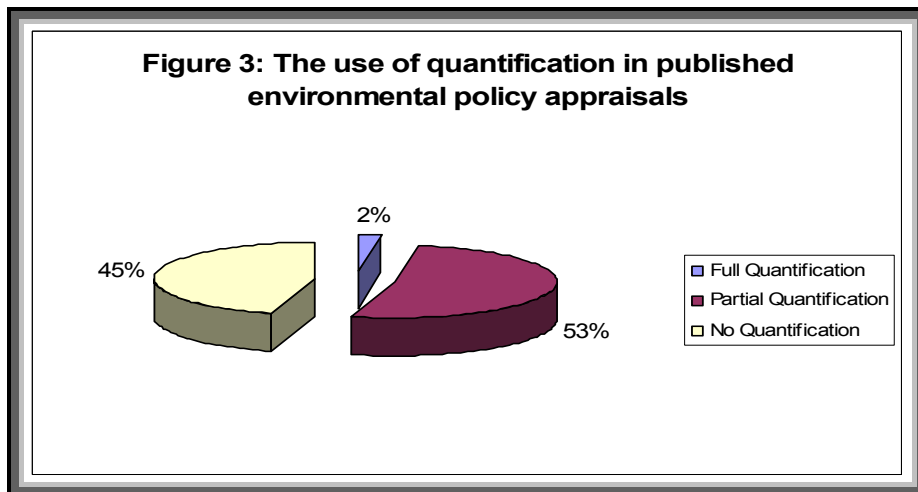


Figure 3 seems to empirically confirm Pearce's (1998: 94) claim that in general civil servants are unwilling or unable to quantify environmental costs and benefits in appraisal processes, despite official appraisal guidance being highly weighted in favour of quantification (e.g. DoE, 1991; DETR, 1998; HMT, 2002). The only fully quantified EPA uncovered was a CBA on DEFRA's implementation of the EU Solvent Emissions Directive conducted by the consultancy Entec. The vast majority showing some evidence of partial quantification consisted mainly of qualitative descriptions, interspersed with some limited numerical data. For example, an EPA on the UK's Emissions Trading Scheme listed as one of its benefits 'savings of around 0.7 [million tonnes of carbon], with the savings increasing to a least 2 [million tonnes of carbon] ... [in any future] expansion of the scheme' (DEFRA, 2001: para. 18).



3. EXPLAINING THE PATTERNS OF APPRAISAL

In this section we outline some of the factors that our interviewees thought had affected the implementation of EPA. In doing so, we try to better explore some the putative proximate causes outlined above. On the whole, Table 4 demonstrates that perceptions surrounding the barriers to EPA's success in Whitehall were generally not associated with a particular group of interviewees but tended to be spread across affiliations, i.e. they were not specific to particular sectors or backgrounds. The remainder of this section looks in detail at the issues outlined in Table 4.

Table 4: Interviewees' perception on the drivers of EPA's poor implementation

Affiliation of Interviewee	Low awareness/ lack of expertise	Problems with the guidance and techniques	Limited senior official support within a department	Lack of resources	Not part of a department's core work	Too many appraisal requirements	Complexities of policy making
(2) ¹ Academic economists	XX ²	XX					
(3) Former central government economists	XXX	XXX	X		X		X
(2) Central government economists	XX	X		X		X	X
(2) EAC and civil service college	X	XX	XX	X	X	X	
Sustainable development Unit	X			X		X	
Dept. Culture, Media and Sports	X			X			
Home Office			X	X	X		
Dept. Trade and Industry		X					X
Dept. Works and Pensions			X (but not in their dept.)		X		
DEFRA		X				X	X
Dept. for International Development		X					
Dept. for Transport		X				X	
Dept. for Health		X	X	X	X		
The Treasury		X			X		X
(3) Ministry of Defence and Defence Estates			X	X	X		
Crown Prosecution Service	X				X		
Cabinet Office	X	X	X	X	X		
Inland Revenue			X	X	X		
NB: Areas shaded in grey represent departmental perceptions on the factors affecting EPA in their departments							
¹ The number in brackets represents the number of interviewees associated with the particular affiliation. Where there is no number only one interviewee is represented.							
² The number of 'X's' represents the number of interviewees within each affiliation expressing the associated view point.							

Proximate causes

In accordance with Pearce's (1998: 92) view that ignorance was a significant cause of low EPA uptake, the issues of *low awareness and lack of expertise* were flagged by twelve of our interviewees (see Table 4). An interviewee from the Sustainable Development Unit and two former central government economists believed that policy makers have too limited an awareness of wider policy issues (i.e. they are too sectoral in their outlook), and this makes it difficult for them to apply a cross-cutting tool such as EPA. Then again, training on EPA was theoretically available, but not taken up (see above).

In agreement with Pearce (1998: 91-92), our empirical evidence suggests that *poor guidance and ambivalence towards quantification* might have been hampering EPA (see Table 4). However, in contrast to Pearce's claims (1998: 91), the empirical data does not suggest that guidance was unsuitable because it was geared more towards projects than policy making. Rather, the problem was that guidance was seen to advocate unpopular appraisal methodologies.

As discussed earlier, DEFRA's best practice guidance (DETR, 1998) promoted the use of highly quantified technical-rational appraisal techniques such as CBA. This guidance was generally seen (at least by our interviewees) to be inappropriate because of its excessive focus on quantification and technical detail. Commenting on the guidance, an interviewee from the Environment Agency remarked that:

'the guidance that we've got... [is] very heavy on technique, very heavy on words... [because] it's designed by people who know about the subject, not people who know about how somebody sitting down at a desk, developing a policy, actually works'.

These reflections tie in with the observations made by Owens *et al* (2004: 1952), who argue that there needs to be a reassessment of suitability of using highly 'technical-rational' appraisal techniques to aid strategic policy making. This is not to say that there were no consultations during the writing of the guidance documents. For instance, two eminent economists involved in the production of recent appraisal guidance, confirmed that regular meetings had taken place with the heads of policy units but, crucially, *not* the very desk officers who are expected to apply it. In short, better training is not necessarily conducive to better appraisal; there appears to be a significant communication gap between those writing and applying EPA guidance.

As Table 3 demonstrates, 15 out of the 27 interviewees believed that the implementation of EPA floundered because of a *lack of high-level leadership*. This concept, however, appears to consist of two distinct elements: poor leadership by political actors and institutions (i.e. the Prime Minister, Ministers and the Cabinet), which chimes with the EAC's views (HC 426-I, session 1998-1999, para. 12; EAC HC 341, session 1999-2000, para. 21); and a paucity of leadership by senior departmental officials.⁵

Both Hanley's (2001: 109) and Helm's (1998: 9) claim that EPA is disliked because it is time-consuming and expensive resonates powerfully with the views of eight of our interviewees (see Table 3), who indicated that a *lack of resources* had hampered their attempts to champion EPA within their respective departments. This issue was also highlighted by the EAC (HC 961, session 2002-2003: 13-14), which noted that, while there are 137 Whitehall staff involved in sustainable development, 93 of them work in just three departments, namely international development, foreign affairs and DEFRA. Our interviews revealed that in the majority of departments, there were only one or two officials working on EPI-related issues such as championing and supporting appraisal issues, with some limited (mostly junior)

ministerial support. Often their work is amalgamated with more routine housekeeping issues such as recycling office paper.

Other proximate causes?

Our research also identifies other possible proximate barriers which are not examined in the existing literature. For instance, ten interviewees believed that EPA was being sidelined because it was *not deemed to be core departmental work* (see Table 3). One official told us that EPA 'doesn't happen [because] most of our policy makers see it as totally irrelevant to the core business of the department'. There are at least three relevant schools of thought which suggest slightly different underlying drivers of what might shape policy makers' perceptions of their department's core business: those which propose they are shaped by the actions of self-interested senior bureaucrats pursuing prestigious policy projects (Dunleavy, 1991); those that emphasize the power of culturally defined values resulting from repeated interactions within a department (Powell and DiMaggio, 1991) (popularly known as 'the departmental view'); and those that see them as the product of external pressures, namely powerful actors operating in policy networks (Rhodes, 1997). From our empirical data, however, it is difficult to ascertain which of these perspectives, if any, are able to account for the sectorised patterns of EPA. Future research, though, might fruitfully investigate their relative explanatory power.

Table 3 indicates also that five interviewees believed that there were simply *too many appraisal requirements* - at least ten others as of 1999 (see: Cabinet Office, 1999b). Therefore, because of limited time and resources, policy makers tended to 'cherry pick' those appraisal requirements and systems that fitted with and sustained their core work. However, with the emergence of more integrated forms of RIA (see above), this issue may no longer be so pertinent.

Finally, Table 3 indicates that five of the policy makers suggested that the implementation of EPA was hindered by *the innate complexities of policy making*. There are two main aspects to this point. Firstly, DEFRA suggested that EPA should have run alongside and hence continually informed the development of policy in a very classical instrumental style (see, Ham and Hill, 1993: 81). However, our interviewees suggested that the everyday reality of policy making is much more complicated than this, i.e. it is non-linear and less clear cut. Our interviewees suggested a number of reasons for this, including the existence of pre-defined agendas, manifesto commitments, tradeoffs with other departments, pressure from outside groups and sudden 'bright ideas' from ministers. These perceptions resonate powerfully with the work of policy theorists such as Kingdon (1994), Rhodes (1997) and Sabatier (1998), who all suggest that policy evolves in a much more recursive and iterative manner. Again, future research might look at the issue of (non) appraisal from these some or more of these alternative perspectives.

Secondly, particular problems were seen to be associated with the way in which the EU impacts upon UK environmental policy making. About 80% of UK environmental legislation is thought to arise from the EU (Jordan, 2002a: 41), and as noted above, DEFRA's EPA guidance (DETR, 1998: para. 5) states that all policies with potentially significant environmental impacts, 'including those under negotiation in the EU', should be appraised'. Thus, if EPA were being properly applied according to the best practice guidance prescriptions, one would have expected a significant number of EPAs on policies stemming from the EU. However, only 26% of EPAs published between 1997 and 2004 concerned EU proposals. Why, though, were so few EU-related-policies appraised?

When interviewed, David Pearce claimed that:

'...a lot of what goes wrong [with appraisal], I think goes wrong in Brussels, and that compromises...the assessment procedures here because we end up having to do assessments on things we've already agreed to, and which it would be embarrassing to then discover do not pass a cost-benefit test'.

Reflecting arguments he made in a recent paper (Pearce, 2004, pp.133-134), Pearce seems to suggest that until the recent introduction of IA at EU level, the Commission did not routinely appraise its proposals. What is clear, is that, in accordance with views recently expressed by the National Audit Office (NAO), the UK handled the appraisal of EU directives rather inconsistently (NAO, 2004: 19). Whether or not this was part of a ploy to get EU legislation implemented that would not have satisfied the UK Cabinet (Jordan, 2002b: 25), is not for us say.

Proximate or underlying causes?

Having outlined the possible proximate causes of the poor implementation of EPA, it is useful to assess whether they are indeed proximate, or whether they go beyond EPA and hence might be more fundamental. One way of doing this is to compare EPA practice with the old form of RIA over a similar timeframe. RIA is a useful benchmark as it is hierarchically enforced by the Cabinet Office. By contrast, EPA was led by DEFRA which is a more peripheral line department. Therefore, comparing the two should provide a basis for determining whether the problems associated with EPA are specific to the low profile status of the environment or have something to do with appraisal *per se*.

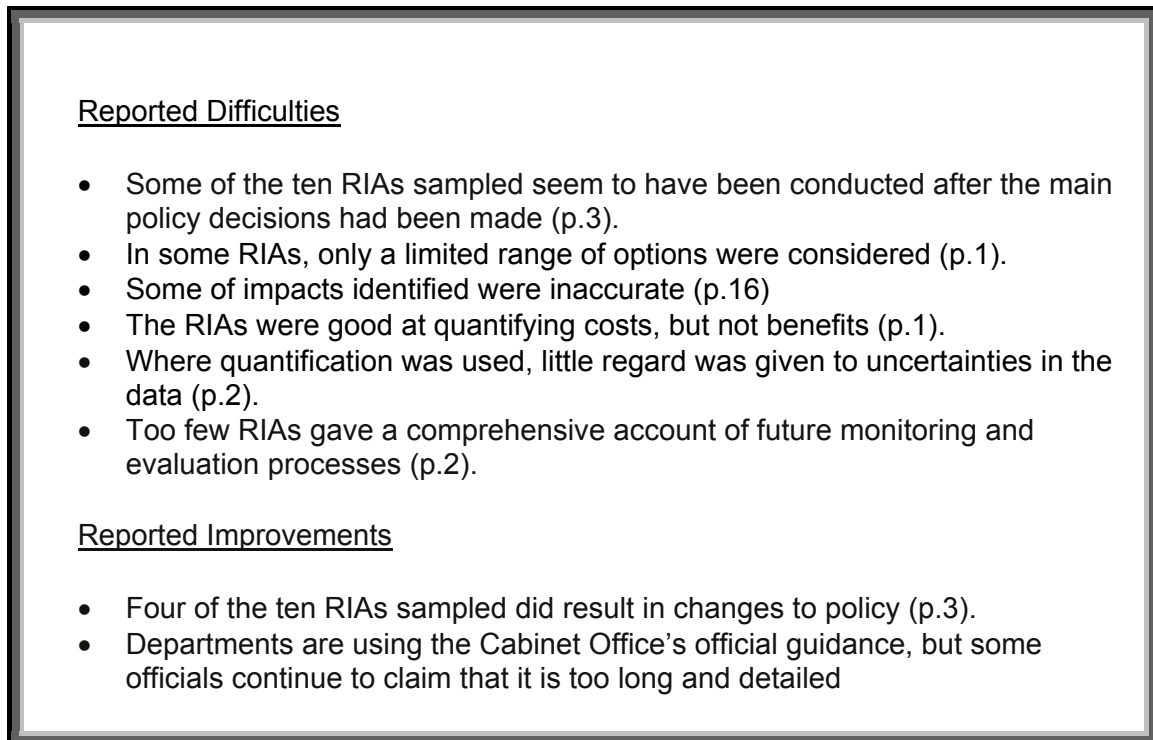
We have already noted that far more RIAs were produced than EPAs. Thus RIA appears to have been much more deeply integrated into departmental thinking (see Tables 1 and 2). The relatively low output of EPA relative to RIA possibly reflects a specific opposition to its environmental focus. However, in spite of the greater number of old-style RIAs produced, concerns have also been repeatedly voiced about their quality, amongst others by the NAO (NAO, 2001; 2004). These are strikingly similar to those levelled at EPA. For instance, the NAO (2001: 5-6; 2004: 6, 7, 30-32) observed that the quantification of costs in RIAs tended to be good, but the quantification of benefits was poor. This made it difficult to assess the relative merits of different options (NAO, 2004: 7). Moreover, the NAO suggested that some RIAs were also used as *ex-post* justifications for pre-determined policies rather than *ex-ante* options assessments. For example, the NAO (2004: 5, 17, 19) reported that there was a paucity of options appraisal; industry in particular complained that decisions had already been made before they are consulted. The NAO (2001: 6) also noted that, there was a lack of expertise and experience amongst officials with regard to RIA and a plethora of different guidance, tailored to meet the sectoral needs of specific departments (*ibid*: 30). The similarities with EPA are, therefore, very strong

What possibly explains these shared difficulties? Like EPA, the RIA guidance (Cabinet Office, 2003) also promotes the application of highly quantified technical-rational methods of appraisal (e.g. CBA), as summarised in the Treasury's Green Book (2002). Questions need to be asked about whether such techniques really suit the needs of policy makers, given the apparently widespread levels of mistrust about quantification and the complex, non-linear nature of policy making, which we and others have revealed. As Owens *et al* (2004: 1952) comment, 'the technical-rational model of appraisal has been subject to a trenchant critique, and practices grounded in it have sometimes lost legitimacy to the extent that it has become a political necessity to replace them'. This brings us neatly to the future, notably the prospects for more integrated forms of RIA. Will they mark a break with the past or do they risk being hamstrung by the same problems encountered by EPA?

4. LEARNING LESSONS FOR MORE INTEGRATED FORMS OF APPRAISAL

Figure 4 details some of the principal findings of the latest NAO report (2005) on RIA, which examined a sample of 10 assessments conducted between 2003 and 2004 (i.e. the period of transition towards integrated RIA). Compared to their previous surveys of RIA (see above), the NAO observed an overall improvement in the quality and impact of the appraisals produced. Also, unlike the experience with EPA, and previously with RIA, it appears that official best practice guidance (Cabinet Office, 2003) is now being more consistently applied. Moreover, a number of RIAs led to some policy proposals being heavily modified or terminated altogether. Nonetheless (and in line with our findings), it still appears that many RIAs are: *ex-post* assessments conducted after the main policy direction had been decided; limited in the scope of policy options considered; poor at quantifying benefits; and not good at highlighting uncertainties in the data. In other words (and notwithstanding some recent improvements), policy appraisal seems to suffer the same problems, irrespective of the type used.

Figure 4: Key findings from the National Audit Office's review of regulatory impact assessments (NAO, 2005)



Significantly, unlike EPA, the new system of RIA does benefit from significant and enduring Prime Ministerial backing. Following an announcement in the 2004 Budget, a Panel for Regulatory Accountability, chaired by the Prime Minister, was established to ensure continued political leadership. EPA always lacked equivalent high-level backing from the Cabinet and the Cabinet Office. The panel scrutinises any proposed regulation that imposes potentially high costs on businesses, and 'signs off' proposals that have been subjected to a comprehensive RIA (NAO, 2005: 12). According to the NAO, the panel has already rejected and delayed some proposals 'where it considered that departments had not properly analysed or justified extra burdens on businesses' (*ibid*: 12). Again, EPA never received such high level support. On the other hand, there is a price to pay for the increased level of central leadership, in the sense that the new RIA system is still primarily focused on regulatory burdens imposed on business, and not sustainability issues (especially

environment and society) in the wider meaning. An analysis of 9 of the 10 RIAs in the NAO's report seems to confirm this,⁶ in that only one⁷ demonstrated that environmental impacts had been considered (and these were deemed to be too minimal to warrant detailed analysis).⁸ However, more research is required as the 9 RIAs examined only represent a small proportion of the 464 RIAs produced between 2003 and 2004.

5. CONCLUSIONS

Despite the UK supposedly being in the vanguard of states applying policy appraisal to pursue EPI (and ultimately sustainability), our more detailed empirical investigation of the UK system of EPA reveals a number of significant gaps between promise and reality. In particular, the support mechanisms developed within each department were highly sectorised, few EPAs were ever produced, and those that were, fell a long way short of DEFRA's best practice criteria (DETR, 1998). Moreover, even the officials in DEFRA failed to implement EPA satisfactorily. Consequently, there was unlikely to have been much sufficiently high quality information generated on the environmental spillover effects produced by sectoral policies. Good information flows between departments in the course of daily policy making is a necessary condition for EPI (Shout and Jordan, 2005: 215). Without them, DEFRA will struggle to have a sufficiently early warning of environmentally damaging proposals in cognate sectors, and thus pursue EPI.

Crucially, while we started out by examining EPA as a potentially strong tool for implementing EPI, we have uncovered a number of more systematic issues which deserve more detailed research, as they are still not adequately addressed in the public policy or appraisal literatures. One of these is the more widespread failure of policy appraisal systems to take root in Whitehall. Here, we noted: a lack of expertise; an ambivalence towards quantification; and the more general unsuitability of rigid technical-rational systems to everyday policy making situations. These findings are significant given the UK government's focus on better and more evidence-based policy making (e.g. see Cabinet Office, 1999a), as well as very similar trends in the EU.

What, though, are the wider implications of these findings, particularly with regard to improving appraisal regimes such as RIA and IA? First, the UK's experience with EPA suggests that it is essential that both policy officials and more senior policy makers attend training courses. This is the necessary to understand the wider implications of policy making (i.e. beyond a department's sectoral interests) as well as improving expertise amongst officials. Second, sustained and active political leadership from the centre of government (e.g. the Prime Minister, Ministers of State, the Cabinet, etc) and from senior departmental officials is another necessary condition for ensuring better policy appraisal. As Peters (1997: 52) observes, such leadership is absolutely vital to the success of complicated cross-cutting initiatives such as EPI, sustainability and better regulation, in a policy world very much dominated by strong departments chasing their narrowly conceived interests. Third, it is important that an appropriate level of resourcing (e.g. human, finance and expertise) is given to departments to help them to appraise. The case of EPA demonstrated that where resourcing is low, officials struggle to promote EPA within their respective departments. Finally, it is also vital that those advocating appraisal do more to consider the needs of users. The more technical-rational techniques of appraisal (e.g. CBA), which assume that policy making is largely linear, fail to take account of the more messy everyday reality of policy making in Whitehall. There is, therefore, an especially urgent need to bridge the gap in communication between those writing guidance or developing appraisal techniques and those who are enjoined or forced to use them.

There are also more specific issues that need to be addressed with regard to how well the UK's more integrated system of RIA picks up environmental and, for that matter, other 'sectoral' impacts. While incorporating EPA into RIA means that policy appraisal in the UK has been rationalised and given stronger Prime Ministerial backing, it does not necessarily ensure that the environment is given a stronger hearing in the policy process. On the contrary, there is a danger integrated forms of appraisal might squeeze out environmental concerns, making it harder not easier to identify more sustainable courses of action. The EAC is so concerned about this possibility that it recently recommended that the government

'considers restructuring the present RIA procedures by inserting a new higher tier...[to] separately identify economic, environmental and social impacts' (HC 261, session 2004-2005, para. 55). Indeed, we have demonstrated that coverage of environmental impacts in the RIA scheme is rather limited. Crucially, the primary focus of the new RIA system is on reducing the regulatory burden on business. Thus, there is a real danger of RIA becoming nothing more than a superficial 'tick box' activity, through which individual departments pick and mix from the various elements of RIA to suit their sectoral interests.

Throughout this paper we have endeavoured to identify a number of different important directions in which future research may now head in this important area of public policy making. Firstly, additional research is needed to provide a more detailed account of some of the underlying difficulties that appear to plague appraisal in Whitehall. Second, there is a need to examine how communication can be improved between the writers and the users of guidance. For instance, what potential roles could psychology, facilitation, etc, play in bridging the apparent communication gap between these two groups? Finally, further research is needed to investigate whether the limited coverage of environmental issues in the latest *tranche* of RIAs is common to a much larger set of RIAs conducted over a longer time period. If this were the case, the UK's reputation for developing strong and effective forms of governance to support the implementation of EPI and sustainability at the level of daily policy making, may need to be radically re-interpreted.

References

- Cabinet Office (1999a) *Modernising Government*. HMSO: London
- Cabinet Office (1999b) *Policy Makers' Checklist: Using Impact Assessment and Appraisal - a Toolkit*. HMSO: London
- Cabinet Office (2003) *Regulatory Impact Assessment Guidance*. HMSO: London
- DEFRA (2001) *UK Emissions Trading Scheme: Regulatory and Environmental Impact Assessment*. HMSO: London
- DEFRA (2002) *Sustainable Development in Government: Green Ministers First Report*. DEFRA: London
- DETR (1997) *Experience with the 'Policy Appraisal and the Environment' Initiative*. HMSO: London
- DETR (1998) *Policy Appraisal and the Environment: Policy Guidance*. HMSO: London
- DoE (1990) *This Common Inheritance*. London: HMSO.
- DoE (1991) *Policy Appraisal and the Environment*. London: HMSO.
- Dowding, K.M. (1995) *The Civil Service*. London: Routledge.
- Dunleavy, P. (1991) *Democracy, Bureaucracy and Public Choice: Economic Explanations and Public Choice*. Hemel Hempstead: Harvester Wheatsheaf.
- European Commission (2003) *Impact Assessment in the Commission: Internal Guidelines on the New Impact Assessment Procedure Developed for the Commission Services*. EU: Brussels
- Ham, C., and Hill, M. (1993) *The Policy Process in the Modern Capitalist State*. Hemel Hempstead: Harvester Wheatsheaf.
- Hanley, N. (2001) Cost-Benefit Analysis and Environmental Policy Making. *Environment and Planning C*. 19: 103-118.
- Harrington, W., and Morgensten, R.D. (2000) Evaluating Regulatory Impact Analysis, *Paper Presented to the OECD Expert Meeting on Regulatory Performance: Ex-Post Evaluation of Regulatory Policies*. OECD: Paris.
- Helm, D. (1998) The Assessment: Environmental Policy-Objectives, Instruments, and Institutions. *Oxford Review of Economic Policy*. 14(4): 1-19.
- Hertin, J., and Berkout, F. (2003) Analysing Institutional Strategies for Environmental Policy Integration: The Case of EU Enterprise Policy. *Journal of Environmental Policy and Planning*. 5(1): 39-56.
- HMT (2002) *Green Book: Appraisal and Evaluation in Central Government*. HMSO: London
- Jacob, K., and Volkery, A. (2004) Institutions and Instruments for Government Self Regulation: Environmental Policy Integration in a Cross-Country Perspective. *Journal of Comparative Policy Analysis*. 6(3): 291-309.
- Jordan, A. (2002a) Efficient Hardware and Light Green Software: Environmental Policy Integration in the UK. In Lenschow (Ed.), A., *Environmental Policy Integration: Greening Sectoral Policies in Europe*. 35-56. London: Earthscan.
- Jordan, A. (2002b) *The Europeanization of British Environmental Policy*. Basingstoke: Palgrave MacMillan.
- Lafferty, W.M., and Hovden, E. (2003) Environmental Policy Integration: Towards an Analytical Framework. *Environmental Politics*. 12(3): 1-22.

- Lenschow, A., Ed (2002a) *Environmental Policy Integration: Greening Sectoral Policies in Europe*. London: Earthscan.
- Lenschow, A. (2002b) Greening the European Union: An Introduction. In Lenschow, A. (Ed.), *Environmental Policy Integration: Greening Sectoral Policies in Europe*. 3-21. London: Earthscan.
- Lenschow, A. (2002c) New Regulatory Approaches in 'Greening' EU Policies. *European Law Journal*. 8(1): 19-37.
- NAO (2001) *Better Regulation: Making Good Use of Regulatory Impact Assessments: HC 329 session 2001-2002: 15th November 2001*. The National Audit Office: London
- NAO (2004) *Evaluation of Regulatory Impact Assessments Compendium Report 2003-2004 - HC 358 session 2003-2004: 4th March 2004*. HMSO: London
- NAO (2005) *Evaluation of Regulatory Impact Assessments Compendium Report 2004-05. Report by the Comptroller and Auditor General, HC 341 session 2004-2005*. HMSO: London
- OECD (2001) *Sustainable Development: Critical Issues*. Paris: OECD.
- OECD (2002) *Environmental Performance Reviews: UK*. Paris: OECD.
- Owens, S., Rayner, T., and Bina, O. (2004) New Agendas for Appraisal: Reflections on Theory Practice and Research. *Environment and Planning A*. 36: 1943-1959.
- Pearce, D.W. (1998) Cost-Benefit Analysis and Environmental Appraisal. *Oxford Review of Economic Policy*. 14(4): 84-100.
- Pearce, D.W. (2004) Does European Union Policy Pass a Cost Benefit Test? *World Economics*. 5(3): 115-137.
- Peters, B.G. (1997) *Managing Horizontal Government: The Politics of Coordination*. Canadian Centre for Management Development: Ottawa
- Powell, W.W., and DiMaggio, P.J., Eds (1991) *The New Institutionalism in Organisational Analysis*. London: University of Chicago Press.
- Rhodes, R.A.W. (1997) *Understanding Governance: Policy Networks, Governance, Reflexivity and Accountability*. Buckingham: Open University Press.
- Richards, D. (1996) Elite Interviewing: Approaches and Pitfalls. *Politics*. 16(3): 199-204.
- Sabatier, P.A. (1998) The Advocacy Coalition Framework: Revisions and Relevance for Europe. *Journal of Public Policy*. 5(1): 98-130.
- Schout, A., and Jordan, A. (2005) Coordinated European Governance: Self-Organizing or Centrally Steered? *Public Administration*. 83(1): 201-220.
- The Green Ministers' Committee (1999) *Greening Government: First Annual Report*. HMSO: London
- The Green Ministers' Committee (2000) *Greening Government: Second Annual Report*. HMSO: London
- The World Commission on Environment and Development (WCED) (1987) *Our Common Future*. Oxford University Press: Oxford and New York
- Young, S.C. (2000) The United Kingdom: From Political Containment to Integrated Thinking. In Lafferty, W.M. and Meadowcroft, J. (Eds.), *Implementing Sustainable Development Strategies and Initiatives in High Consumption Societies*. 245-272. Oxford: Oxford University Press.

¹ Over the past ten years, the environment department has undergone three structural changes. Up until 1997 it was called the Department of the Environment (DoE); from 1997 until 2001 it was named the Department of the Environment Transport and the Regions; and since 2001 it has been called DEFRA.

² The first was a CBA on DEFRA's implementation of the EC Solvent Emissions Directive (1999) compiled by Entec. The other was a strategic environmental assessment of the Ministry of Defence's Strategic Defence Review (2002) produced by Entec, Land Use Consultants and Rural Planning Services.

³ The Ministry of Defence, the Home Office, Customs & Excise, Department of Health, the Cabinet Office, and three from the Inland Revenue

⁴ EPAs by the Department of Trade and Industry on: The Review of Energy Sources for Power Generation (1998); New Electricity Trading Arrangements (1999); The Coal Subsidy Scheme (2000); Modernising the Framework for Gas and Electricity Generation (2000); and Our Energy Future, Creating a Low Carbon Economy (2004)

⁵ Interviewees from the Inland Revenue, the Cabinet Office, the Ministry of Defence, the Department of Health, the Department of Work and Pensions, the Home Office, the Civil Service College, and the EAC, as well as a former central government economist.

⁶ We were unable to obtain the Office of the Deputy Prime Minister's RIA for the High Hedge Bill.

⁷ An RIA on the Local Government Act 2003 (Small Business Relief) by the Office of the Deputy Prime Minister.

⁸ It could be argued that many of the proposals in the RIA sample were unlikely to have any significant environmental impacts, but there was little evidence within the documents that the environment was considered at all (i.e. a statement saying that the proposal had no significant environmental impacts).