EEEN conference 2014 – Helsinki
Emilie Mutombo – ULB-IGEAT

A bird's-eye view on EC environmental policy framing

Impact Assessment as discursive practice

Studying the performative effects of IA practices on EC environmental action

ULB UNIVERSITÉ LIBRE DE BRUXELLES, UNIVERSITÉ D'EUROPE

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EC-IA as procedural object

- BR and SD tool (EC, 2002; 2006; 2009):
  - Integrated ex ante policy apraisal; **But**
- Marginal environmental dimension
  - Historically (SIA mentioned only once)
  - Conceptually (EC-IA as RIA)
  - In terms of implementation (Wilkinson et al. 2004; Lee and Kirkpatrick 2006; Renda 2006; Nielsen et al. 2006; EcoLogic et al. 2007, Watson et al, 2007; Bizer, 2009 ...)
    - Issue of quantification and monetization of non economical aspects, (EcoLogic et al. 2007:61; Bizer et al. 2010:27; …)
- Structural bias:
  - Technical/methodological (quantification)
  - Conceptual (path dependency to RIA)
  - Political (priority to Lisbon and SDD obsolescence)

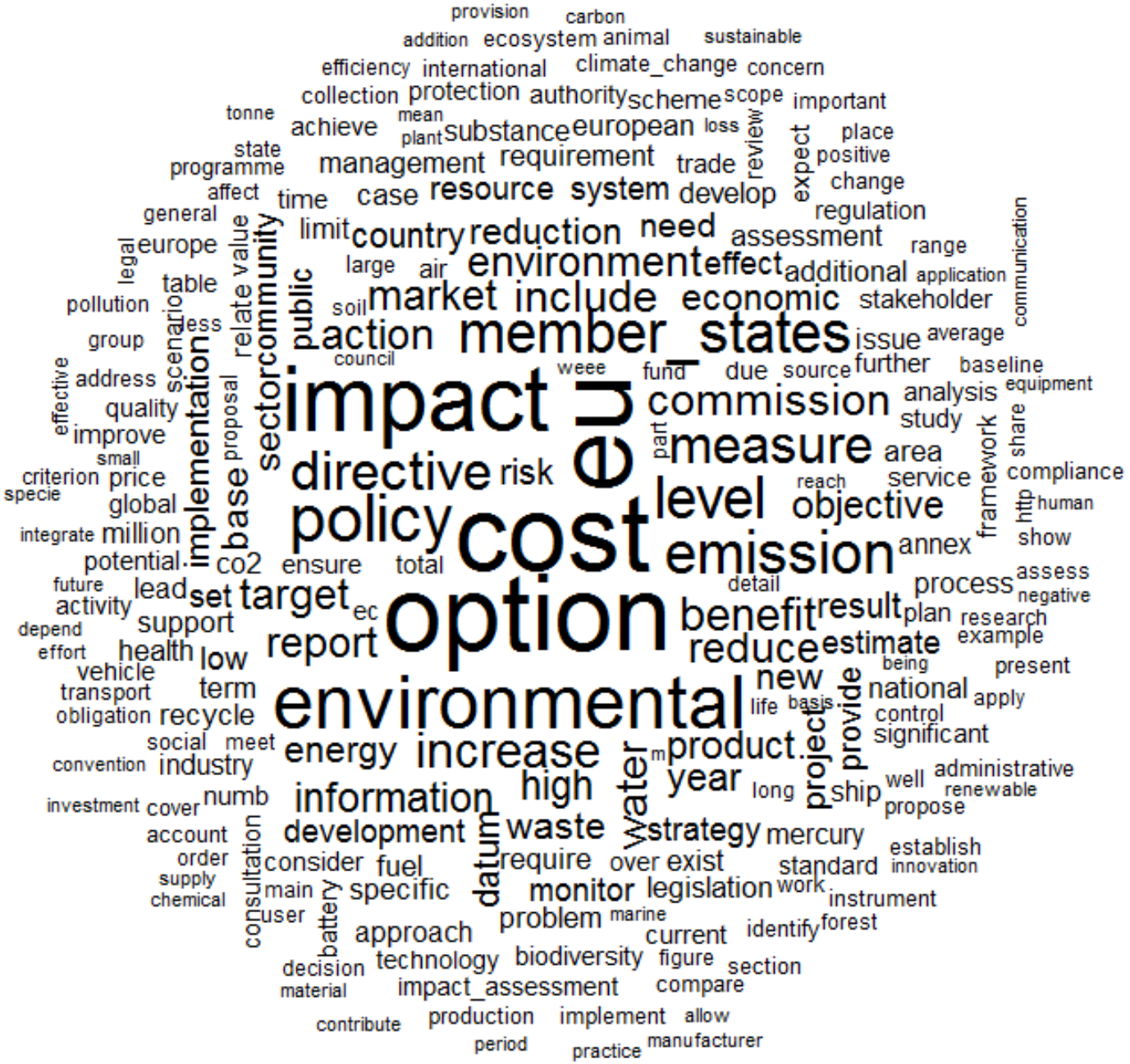
EC-IA as discursive object

- If marginal and biased treatment
  - Which frame?
  - What environmental action?

→ Discursive approach

  - *What environmental discourse are embedded in EC-IA reports?*
  - Through Discourse analysis and lexicomtery
    - DG ENV 2003-2012 EC-IA reports

      →69 reports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Lexicometry and DHC

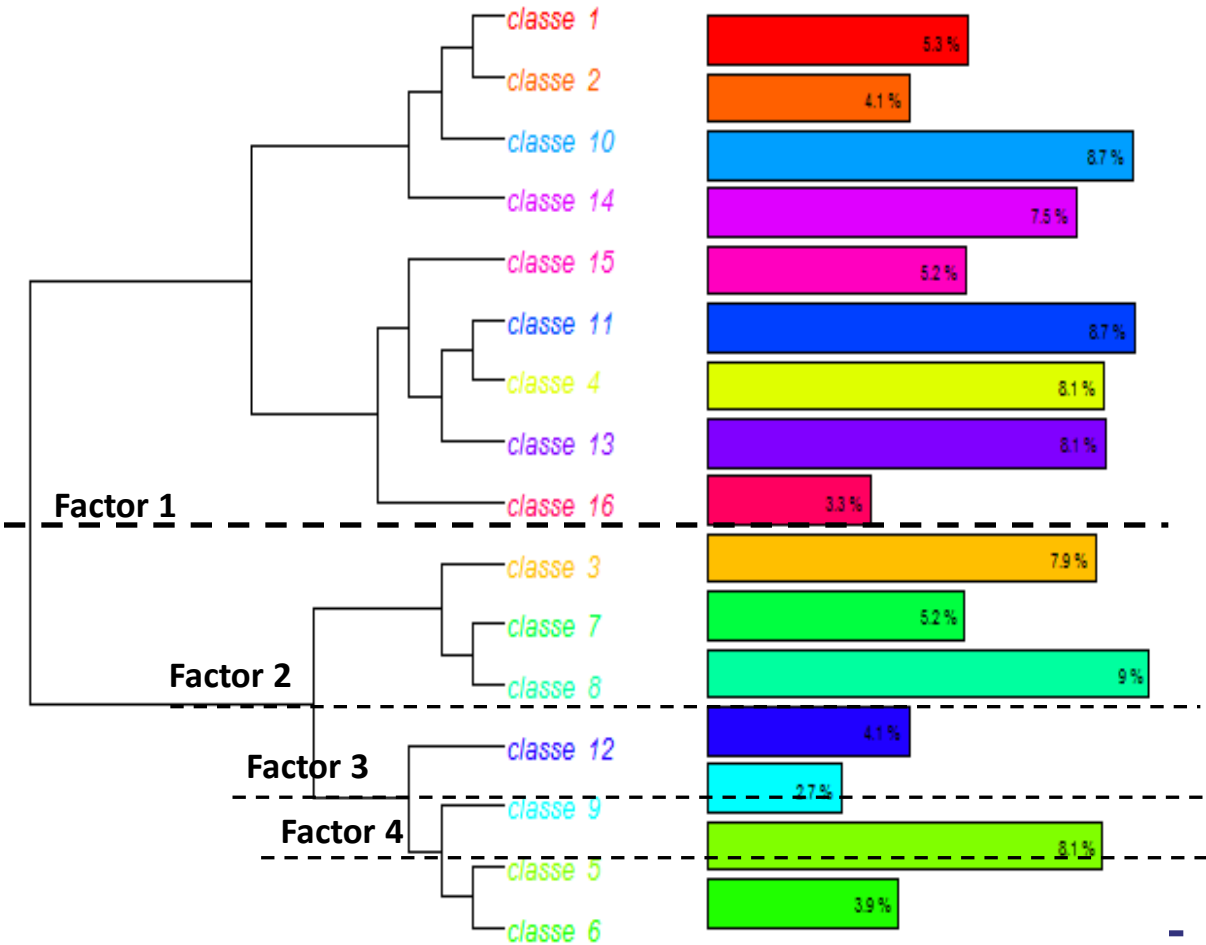
- Lexicometric software (Iramuteq/Alceste) as exploration and heuristic tool
- *Descending hierarchical class.* Reinert (1983)

i.e. classification based on lexical proximity

- Study of the 'lexical worlds'
- Not a matter of numbering occurrences. But of *relations among words*.

16 Classes – 4 significant oppositions

- 16 Classes: covering btw. 2,7% and 9% of text segments
- Divided along 4 significant factors (15%, 11%,10%, 9% of inertia)



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3518	****
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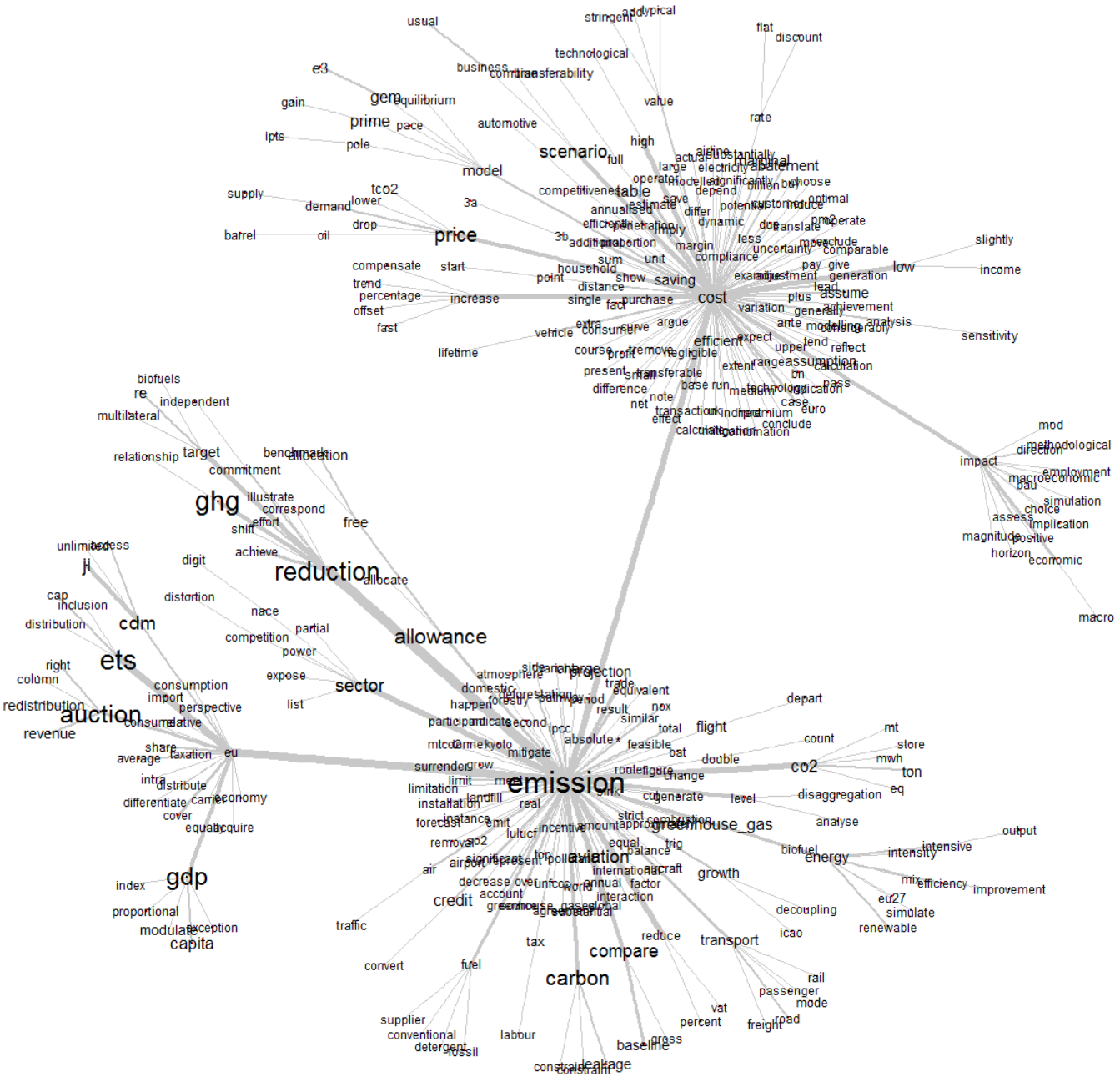
3520	306
3521	268
3522	627
3523	173
3524	213
3525	175
3526	304
3527	354
3528	157
3529	317
3530	136
3531	480
3532	311
3533	106
3534	334
3535	76
3536	157
3537	886
3538	108
3539	53
3540	74
3541	262
3542	54
3543	235
3544	91
3545	144
3546	91
3547	71
3548	44

profiles



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The first lexical group: **Dealing with living beings through evidence-base regulation and green markets requires funds and coherent strategies**	**The second lexical group:** **Costs of impacts from and fight-measures against GHG and other (hazardous) pollutants due to human activities**
1.1: Allocation of funds for coherent and integrated strategies across sectors and institutional levels (25.63%)	***2.1: Cost due to impact of anthropic activities on ecosystems and human health (22,14%)***
Class 14 (7.53%): Mobilization and allocation of financial resources: R&D for technological eco-innovation, environmental earmarking and solidarity	Class 3 (7.9%): Waste treatment and recycling through a cost perspective and as a (eu) market issue
Class 10 (8.65%): environment as coherent and integrated, strategic and effective policy approaches	Class 7 (5.24%) : Estimation of costs of damages on ecosystems, human health and activities
Class 1 (5.34%): local and sectoral levels of implementation and needed specific knowledge base	Class 8 (9%): Impacts on ecosystems, human health and activities by dissemination of pollutants through water, soil and air
Class 2 (4.11%): social and economic dimensions of environmental policies through e.g. ecosystem services	
1.2 Dealing with living beings through evidence-based regulation and green markets (33.38%)	***2.2: GHG emissions reduction: market, technology, standards and costs (18.82%)***
Class 16 (3.32%): Trading the living: avoiding unnecessary harm to animal welfare and illegal import and use of genetic resource and timber	Class 12 (4.13%): Limitations on emissions of pollutants from diverse types of fuels
Class 15 (5.25%): Consultation and collaborations: interested parties are heard	Class 9 (2.74%): Best calculations options for setting emission performance standards w/r to targets and car industry
Class 13 (8.1%): Environmental performance standards	Class 5 (8.05%): Carbon markets and the costs of GHG emissions reduction measures
Class 11 (8.7%): Environmental policy as information collect and database harmonization	Class 6 (3.9%): End of pipe and cleaner production: RE and CCS as new technologies to be financed and deployed
Class 4 (8.01%): Clarification, evolution and simplification of the legislation	

Factor 1 & 4 covers 66% of text segments and ¼ of inertia

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The two approaches

- Institutionalo-conservationist perspective based on european database to manage the environnement's components and health against (risk of) pollution damages
- Technico-economic lexicon and market-oriented perspective through technological, cost and production issues, « green » products and carbon market

Environmental (policy) discourses

(Oels, 2005; Bäckstrand and Lövbrand, 2006; Luke 1995, 1999, 2011; Hajer 1995, 1996, 2005; Weale, 1993; Mol 2010; …)

Green governmentality

- Administrative apparatus and technocratic control; Expansion of intervention
- Regulation
- Natural sciences
- Surveillance system, standardized method and procedures; ‘Big science’
- Ecological preservation in terms of ‘safety’ and ‘security’, resources
- …

Weak ecological modernization

- Market
- Economics
- Cost-benefit analyses
- Competitiveness, flexibility, efficiency
- Contracts, partnerships, performance
- Innovation and market opportunity
- Decoupling, win-win, synergies

GG: 'Big Science', centralized and standardized methods and procedures for the management of 'life' itself

- at present the status of information flows based on collection and reporting of such data and details is extremely inhomogeneous throughout ms (Classe 11 - IA of Pesticides Thematic Strategy; 2006)

- *impact on national prevention policies systematic pooling of information through risk mapping would contribute significantly to a stronger empirically founded knowledge base it would generate vulnerability and risk assessments aimed at increasing public awareness supporting the process of prioritising* (Classe 1 - IA of Communication: A Community approach on the prevention of natural and man-made disasters; 2009)

GG: Technocratic procedures of certification and control

- *since several other products are controlled in a similar manner the scheme seems feasible if verification is based on documentation and the procedures are incorporated in to the existing computerized systems* (Classe 13 - IA of Regulation laying down the obligations of operators who place timber and timber products on the market; 2008)
- *in order to guarantee a high quality verification and validation process for all emas registered organisations clear and specific rules for verification and validation are to be defined in order to come to a harmonized and reliable system which will improve the consistency in the implementation of the scheme* (Classe 13 - IA of Proposal for a Regulation on the voluntary participation by organisations in a Community eco-management and audit scheme (EMAS); 2004)

GG:Conservationist perspective & Nature as resources provider

- *6th eap s objectives achieving better understanding of the threats to environment and human health in order to take action to prevent and reduce these threats contributing to a better quality of life through an integrated approach concentrating on urban areas* (Classe 10 – IA of Mid-term review on the Sixth Community Environment Action Programme; 2007)
- *these are eventually deposited and have a whole range of effects on human health biodiversity buildings crops and forests air pollution results in several hundreds of thousands of premature deaths in europe each year increased hospital admissions extra medication and millions of lost working days* (Classe 7; Conservationist side of factor 4 – IA of The Communication on Thematic Strategy on Air Pollution; 2005)

- *these objectives contribute to the sustainable use of natural resources which is one of the principal objectives of the sustainable_development strategy these objectives will also contribute to developing a cost effective waste policy and to promoting recycling activities by improving and simplifying the legal framework* (Classe 10 – IA of Thematic Strategy on the prevention and recycling of waste)
- *26 natural capital consists of natural assets in their role of providing natural resource inputs and environmental services for economic production it is generally considered to comprise three principal categories natural resource stocks land and ecosystems* (Classe 2 – IA of Proposal for a Decision on a General Union Environment Action Programme to 2020 "Living well, within the limits of our planet")

EM: Cost-benefit analysis as principle of decision

- *in other words the modelling suggests that including road sector measures to scenario a was **cost** effective compared with other sectors table 15 impact of excluding additional road emission reduction measures on annual compliance **costs** in 2020* (Classe 5 – IA of The Communication on Thematic Strategy on Air Pollution; 2005)
- *inclusion of the **price** of allowances in final product **prices** is an intended effect of the ets as it ensures correct carbon **price** signals shifting demand towards less emission intensive products such substitution effects are essential for achieving emission reductions at lowest **cost*** (Classe 5 – IA of Directive amending […] the greenhouse gas emission allowance trading system of the Community; 2008)
- *as the volumes of weee arising increase the total **costs** from the management of weee will also increase but likely not at the same rate economies of scale in collection and treatment are likely to reduce **costs** per tonne* (Classe 3 – IA of Proposal for a Directive on waste electrical and electronic equipment (WEEE); 2008)
- *economic and regulatory framework to bring environmentally safe carbon capture and sequestration ccs to deployment with new fossil fuel power plants if possible by 2020 42 the **costs** of ccs are one of the principal barriers to uptake* (Classe 6 – IA of Directive on the geological storage of carbon dioxide […]; 2006)

EM: « *technocratic greening of industrial production*”

- *experience shows that rapid deployment has helped to reduce unit costs of production of renewable energy technologies in the electricity sector in the years 1980 1995 65 for photovoltaics 82 for wind power 85 for electricity from biomass* (Classe 6 – IA of Communication on Winning the Battle against Global Climate Change; 2005)
- *legislation to reduce the ghg emissions of light duty vehicles should not undermine the competitiveness of the automotive industry in europe 2 2 legal basis the proposal on light commercial vehicles is similar to the regulation on co2 emissions from passenger cars* (Classe 9 - Proposal for a Regulation setting emission performance standards for new light commercial vehicles ; 2009)
- *for producers to get or retain a share of that product market they will need to innovate because the ecolabel criteria will be revised over time to ensure that only the best products are awarded eco labels* (Classe 13; institutionalist side of factor 1 - Proposal for a regulation on a Community Ecolabel scheme; 2008)
- *the competitiveness and innovation framework programme cip and cohesion policy these efforts are not sufficient to support green smes faster pace of eco innovation and market penetration is hampered by the lack of risk finance and support for demonstration* (Classe 14; institutionalist side of factor 1 - Communication - Innovation for a sustainable Future - The Eco-innovation Action Plan (Eco-AP); 2011)

Overlaps between ME and GG

Technocratic side of factor 1

- *the thematic strategy on the sustainable use of natural resources contains a long term objective to achieve a decoupling between economic growth and pressures on the environment and to improve resource efficiency it proposes* (Classe 10 - Mid-term review on the Sixth Community Environment Action Programme; 2007)
- *integration is the main driver for ensuring mutual supportiveness between the economic social and environmental dimensions of the sustainable development strategy policy integration can usefully highlights ways to improve cost effectiveness and can create useful win win opportunities for example by generating employment* (Classe 2 - Mid-term review on the Sixth Community Environment Action Programme; 2007)
- *policy coherence and integrated approaches that take into account and attempt to reconcile environmental social and economic objectives are essential to respond effectively to complex challenges and minimise trade offs* (Classe 2 - Proposal for a Decision on a General Union Environment Action Programme to 2020 "Living well, within the limits of our planet"; 2012)

Conclusions:
Not surprising; Still interesting…

- ‘Binary opposition’ btw ‘classic’ env. discourses at EU level
- But no oversimplification:
  - the interpretation covers only 1/4th of the classification (f1 14,89% + f4 9,08% of inertia)
  - 66% of the text segments
- EM is associated to Climate policy
- Still:

• EM weakness; GG stronger

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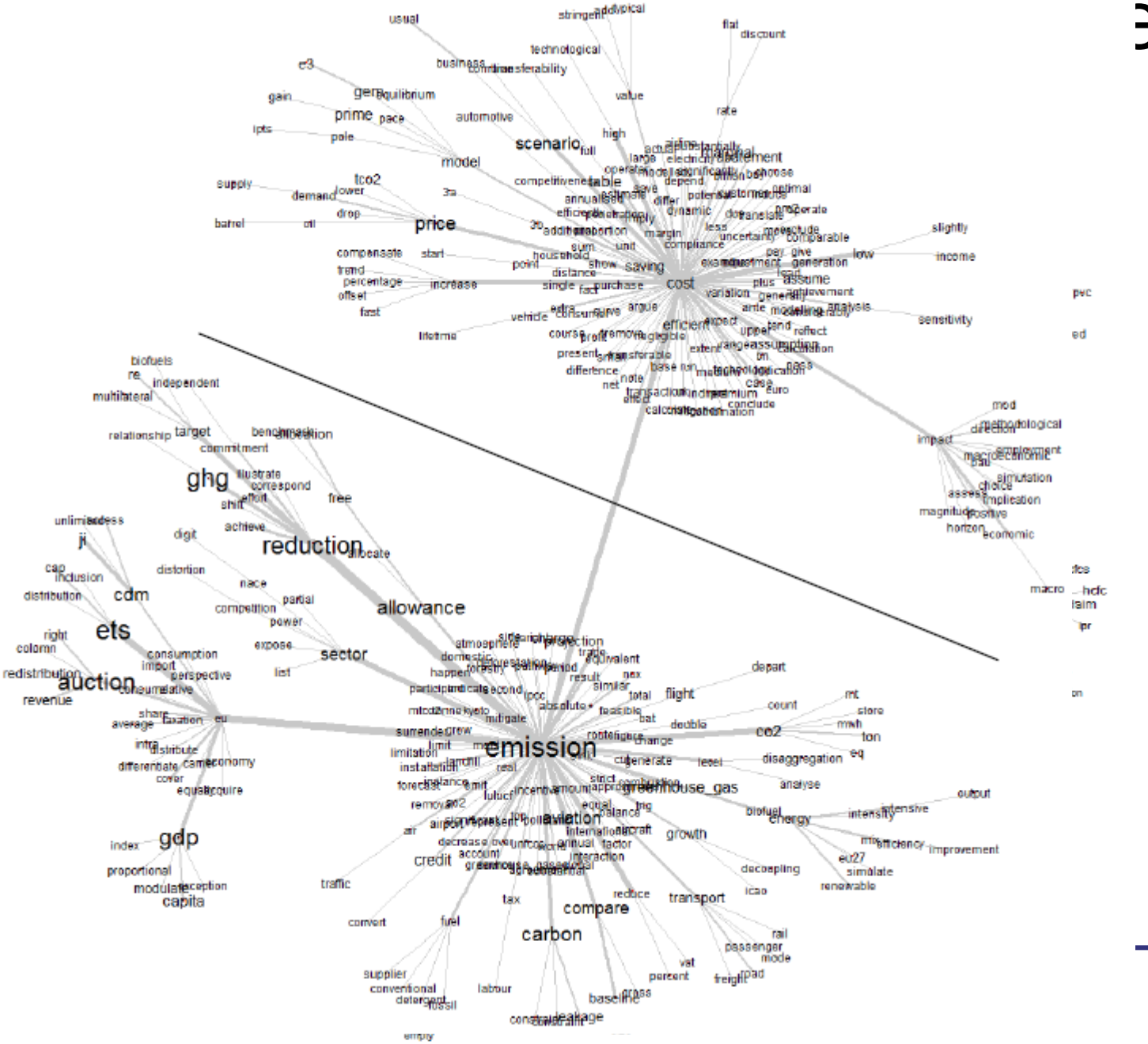
GG covers 43,40% of text segments	**EM covers 22,59% of text segments**

- Classes 5 & 3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Work in progress…

- Carry on with interpretation and conclusions
- Connecting discursive practices to other (non-discursive) pratices to study its performative effect
- …

Comments eagerly welcomed…

Thank you

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