Strategies for Environmental Policy Co-ordination: The New Zealand Experience

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The expression that "everything is connected to everything" in the environment has become a common maxim. That such interdependence is not only of philosophical or theoretical significance has become obvious in the continuation or aggravation of environmental problems, and the manifestation of new problems, despite the efforts of many governments during the last two decades to control environmental degradation. The world-wide upsurge in attention for issues such as the greenhouse effect and the depletion of the ozone-layer reflects a growing perception that ultimately such interdependence is global and that the future of life on this planet is a common predicament.

From the recognition of environmental interconnectedness to the implementation of a concerted effort to solve, mitigate or avoid environmental problems is a big step, however. The fact of environmental interdependence raises fundamental questions about the capability of existing political systems to deal effectively with these problems, and about the potential of existing collective choice mechanisms to generate rational, purposeful action directed at these comprehensive issues. Such doubts are not only directed at the international level where the pressures on the global ecosystem imply a need for a concerted approach, but also at the level of individual nations or states. A key question that arises is whether and how the interconnectedness which exists between human activity and environmental phenomena can be mirrored in the policy process. More specifically, it has been pointed out that there is a need to overcome the fragmentation which characterises the development of policies affecting the environment:

> . . . intersectoral connections create patterns of economic and ecological interdependence rarely reflected in the ways in which policy is made. Many of the environmental and development problems that confront us have their roots in this sectoral fragmentation of responsibility. Sustainable development requires that such fragmentation be overcome.[1]

In particular, the Commission stressed the need to integrate economic and environmental policies: "The common theme throughout this strategy for sustainable development is the need to integrate economic and

[1] World Commission on Environment and Development, *Our Common Future* (Oxford, 1987), p.63. (Also referred to as the "Brundtland report")

ecological considerations in decision making."[2] Another way of framing this question is by asking whether and how the co-ordination of policies affecting the environment can be improved. Environmental policy co-ordination cuts across policy areas often not included under the term environment, such as economic policies, agricultural policies, energy policies, and transport policies.[3] As policies in these areas often have an important impact on the environment, it can be argued that they are also environmental, and in fact the most significant, environmental policies.[4]

Since the early 1970s central environmental agencies with some kind of special responsibility for "the environment" have been established in many countries. Various questions can be asked about the role and effectiveness of these agencies with regard to the co-ordination of environmental policy. How successful have they been in reducing or overcoming the fragmentation and inadequate integration of policies regarding the environment? What strategies did they use? What obstacles did they encounter? How can their co-ordination performance be improved?

In this paper four strategies for environmental policy co-ordination are discussed: co-ordination by hierarchical control; co-ordination by power; co-ordination by mutual adjustment; and co-ordination by common goals. First, the strategies are described in general terms. Then, the difficulties associated with each of these strategies are identified, particularly with regard to environmental policy, on the basis of a review of the literature on co-ordination. Consequently, the strategies and their problems are discussed in the context of the New Zealand experience. It is concluded that, among the strategies for improving environmental policy co-ordination, co-ordination by common goals is likely to become more important, despite the formidable odds against it.

Co-ordination: Substantive and Procedural Models

It has been argued that all forms of co-ordination can be subsumed under four models; hierarchical control; the use of power; adjustment;

[2] World Commission on Environment and Development, *Our Common Future*, p.62.

[3] In other words, environmental policy co-ordination is here interpreted as a form of "cross-sectoral" co-ordination, as co-ordination across policy sectors. The expression "integrating development and conservation" is often used to refer to the same phenomenon.

[4] Bartlett, Robert V. "Comprehensive Environmental Decision Making: Can It Work", in: Normal Vig and Michael Kraft, eds. *Environmental Policy in the 1990s: Toward a New Agenda* (Washington, D.C., 1990), p.248.

and common purpose.[5] Although this is contestable,[6] the classification will be accepted as a useful basis for a discussion of the role of central environmental agencies with respect to environmental policy co-ordination.

Co-ordination by hierarchical control occurs when an agency is endowed with the legitimate power (authority) to issue and enforce orders. Co-ordination by power takes place when an agency imposes its will on others, even though it lacks the legitimacy to do so. Co-ordination by mutual adjustment happens when actors decide and act whilst taking into account the decisions and actions of others. Co-ordination by common goals occurs when policies are made and implemented on the basis of goals or principles shared by all those involved in a policy area.

The first three models of co-ordination, not requiring common goals, will be characterised as *procedural* approaches to co-ordination. The fourth approach, emphasising that co-ordination requires common principles or purposes, will be referred to as the *substantive* approach to co-ordination.

That procedural co-ordination does not require common goals or principles has been expressed most explicitly with regard to mutual adjustment. [Partisan] mutual adjustment (PMA) is based on the idea that: ". . . people can co-ordinate with each other without anyone's co-ordinating them, without a dominant common purpose, and without rules that fully describe their relations to each other".[7] "Partisans" are defined as "persons without a dominant common purpose".[8] Neither do the other two models of procedural co-ordination assume the presence of common goals. Co-ordination by power is based on the values or interests of the co-ordinator.[9] The values associated with co-ordination by hierarchical control have been identified as rationality, efficiency and legitimacy, but otherwise this model has been characterised as "value-neutral".[10]

The distinction between substantive and procedural co-ordination is important for theoretical and practical reasons. First, the distinction

[5] Minnery, John R., "Modelling Coordination", *Australian Journal of Public Administration*, Vol.47 (1988), pp.253-262.

[6] Minnery does not identify any criteria underlying this classification. Models of co-ordination can, of course, be based on a variety of classification-criteria. One classification is not necessarily better than another one, their usefulness depending on the purposes of the analysis. For examples of other classifications see Scharpft, F.W., "Interorganizational Policy Studies: Issues, Concepts and Perspectives", in Hanf, K. and F.W. Scharpf, Eds., *Interorganizational Policy Making. Limits to Coordination and Central Control* (London, 1978), pp.345-370; Mulford, C.L. and D.L. Rogers, "Definitions and Models", in: David L. Rogers and David A. Whetten, *Interorganizational Coordination: Theory, Research, and Implementation* (Ames, Iowa, 1982), pp.9-31;"; and Charles E. Lindblom, *The Intelligence of Democracy* (New York, 1965).

[7] Lindblom, *The Intelligence of Democracy*, p.5.

[8] Lindblom, *The Intelligence of Democracy*, p.4.

[9] Minnery, "Modelling Coordination", pp.256-257.

[10] Minnery, "Modelling Coordination", p.255.

plays a role in the definition of co-ordination as a concept, and consequently, for the development of theories about co-ordination. What are we studying when focusing on a phenomenon called co-ordination? Second, the belief whether or not co-ordination involves or requires common purposes has real consequences for the way co-ordination is approached in the policy process. If the belief predominates that co-ordination by common purpose is unrealistic, or unnecessary, common goals are less likely to be formulated or sought in the policy process. In this context, questions arise about the viability and effectiveness of strategies for improving environmental policy co-ordination.

Strategies For Improving Policy Co-ordination: Options and Obstacles

The four forms of co-ordination identified above provide the obvious bases for four strategies for improving environmental policy co-ordination. Strategies can be focused on developing common environmental goals or principles as a basis for co-ordination; on the establishment or strengthening of authoritative central environmental agencies; on creating or reinforcing a powerful environmental advocate capable of coercing policy-makers to adhere to environmental goals or principles (without having formal authority to do so); or, in a situation where no dominant environmental actor exists, on strengthening the capability of an environmental advocate ("partisan") to induce policy-makers to adjust their policies. All four strategies will be discussed shortly on their appeal to environmental advocates, and on their political viability.

Developing common environmental goals

Many environmental advocates will argue that common environmental goals or principles *must* be pursued across all policy areas if environmental co-ordination is to be meaningful at all. Converting society (including politicians and administrators) to *substantive* ecological rationality is seen as an imperative for addressing environmental problems successfully, and, in the long run, for saving the world. People need to internalise environmental values or principles, and to develop an environmental ethic, for their decisions and practices to become environmentally sound.[11]

An underlying assumption of this line of reasoning is that the environmental principles on which decisions and actions should be based are, or can be, known. However, it has been noted that ecological rationality is:

> . . . not yet a precise and exact way of thinking, not necessarily as internally consistent and coherent as a mathematical logic for which the principles of order have been thoroughly explored, bounded and organized — and universally accepted. Rather, it is an amalgam of diverse streams of thought, some of which may not be fully complementary. The premise and rules of interference for ecological reasoning are many and still evolving; their tightly structured integration is still problematic.[12]

But even if *ecological* rationality can be clearly defined, it does not necessarily lead to the formulation of common goals for *environmental* policy. If the concept of environmental policy is defined as also comprising the human or social environment (quality of life aspects), then the intricate and difficult interaction between human needs, interests, values and ecosystems becomes part of the substantive co-ordination problem. In other words, creating a substantive basis for environmental policy co-ordination involves the formulation of a comprehensive environmental policy, in which ecological, economic and social goals or principles are integrated. However, the difficulties involved in developing a comprehensive environmental policy, based on substantive common goals or principles, appear to be enormous. The obstacles can be roughly classified into two categories: political and theoretical.[13]

The political obstacles relate to the fact that the demand and support for a comprehensive environmental policy is very weak overall. Political rationality militates against a comprehensive approach to policymaking in general, at least in pluralist political systems (or "polyarchies"). Politicians are confronted with many particularistic, specific and competing demands which are not always compatible with each other. Comprehensive policy-making requires an immense effort to harmonise conflicting interests, but offers indeterminate benefits, both in the short and long run. As Bartlett argues, there is little consistent support for a focus on comprehensiveness, even among environmentalists, many of whom seem to think that the environment is better served by concrete, achievable results.[14] It is therefore not surprising that for most politicians things such as planning, co-ordination and comprehensive policy making have a relatively low value and priority. [15] Given the low level of support for the development of a comprehensive environmental policy among

[11] For an example see Ophuls, William, *Ecology and the Politics of Scarcity* (San Francisco, 1977). Ophuls advocates the search for "ultimate values" on which a new order, capable of overcoming the shortcomings of present political systems in dealing with the environmental problematique, needs to be based, and advances the notion of "ecological guardians" for protecting those values.

[12] Robert V. Bartlett, "Ecological Rationality: Reasons and Environmental Policy", *Environmental Ethics*, Vol. 8, (1986), p.231. For examples of the difficulty of avoiding controversy in defining ecological concepts in a policy context see Michael Redclift, *Sustainable Development. Exploring the Contradictions* (London, 1987); Aitken, William, "The 'Carrying Capacity' Equivocation", *Social Theory and Practice*, Vol. 6 (1980), pp.1-11.

[13] Bartlett, "Comprehensive Environmental Decision Making, pp.235-254.

[14] Bartlett, "Comprehensive Environmental Decision Making, pp.242-243.

[15] As Painter points out, co-ordination is "not always" a political good; there are few political rewards in it, it is hard to fulfil, and arouses little interest. By contrast, ad hoc problem-solving may be much more rewarding. Painter, Martin and Bernard Carey, *Politics Between Departments. The Fragmentation of Executive Control in Australian Government* (Queensland, 1979), p.108.

politicians, the public, and even environmentalists, central environmental agencies have little incentive to undertake efforts in this direction. In fact, they are discouraged from doing so because bureaucratic rationality emphasises specialisation, fragmentation and "territorialism", not a comprehensive approach to policy development and a search for common goals.[16]

The theoretical obstacles to formulating common goals as a basis for environmental policy co-ordination relate to the objections which have been raised against the rational-comprehensive approach in general, and to the difficulties of defining environmental rationality in particular. Critics of the rational model of decision-making have argued that the model is hopelessly unrealistic. Two of the main objections that have been mentioned are: first, that it is too demanding in terms of the need for information and analysis; and second, that it is unrealistic because of the multiplicity of divergent and often conflicting goals in the policy process.[17] It has been noted that co-ordination by "common purpose" is rather rare, occurring mainly in crisis situations or major events.[18] Given the divergence of values and interests in society it has been argued that co-ordination by objective, the "striving for a harmonious, consistent and hierarchically ordered set of outcomes or policies [is] a chimera in public policy."[19] In this view the main problem in governmment ". . . is not deciding where you want to go so much as facing up to the difficulties being created by where you are now . . ."[20]

> Vagueness in stating objectives then becomes a virtue rather than the 'pathological' failing bemoaned by managerially oriented reformers of governmental processes. [. . .] On the other hand, to search for clarity and specificity — the sine qua non of rationalist prescription — is to exacerbate conflict and limit the opportunities for joint agreement on action.[21]

Defining environmental rationality on a policy level may be extra difficult. This is not only because of the lack of clarity about what is environmentally rational, as referred to above, but also because environmental issues touch upon people's fundamental values. As Caldwell notes: "the environmental quality issue is widely perceived as threatening to a variety of political, professional, and institutional interests", making

[16] Molnar, Joseph J. and David L. Rogers, "Interorganizational Coordination in Environmental Management", pp.95-108; Hanf, K. and F.W. Scharpf, Eds., *Interorganizational Policy Making.*

[17] See in particular Charles E. Lindblom, *The Intelligence of Democracy,* for an elaboration of these two points.

[18] Minnery, "Modelling Coordination", p.259.

[19] Martin Painter, "Central Agencies and the Co-ordination Principle", *Australian Journal of Public Administration,* Vol. 40, (1981), pp.275-277.

[20] Painter, "Central Agencies and the Co-ordination Principle", p.277.

[21] Robert Gregory, "Political Rationality or 'Incrementalism'? Charles E. Lindblom's Enduring Contribution to Public Policy Making Theory", *Policy and Politics,* Vol. 17, (1989), p.148; also Aaron Wildavsky, *The Art and Craft of Policy Analysis* (London, 1979), pp.29-31.

confrontation in this area more common than compromise and problem-solving approaches.[22] The general thrust of environmentalism has been described as utopian, and as a radical challenge to the dominant societal paradigm.[23] Although support for environmental issues has become very much mainstream, the potential of environmentalism to generate conflict has not diminished. As Cotgrove notes: "Environmentalists are agreed that there is a lot wrong with contemporary industrial societies, and that fundamental changes are needed. But here, the consensus evaporates."[24] It can be concluded that, despite its appeal to environmental advocates, the odds against substantive environmental policy co-ordination appear to be formidable. It comes as no surprise, therefore, that other strategies for improving environmental co-ordination have prevailed in political practice.

Co-ordination by hierarchical control

In general, co-ordination by hierarchical control is much more common, and has been identified as the "bench-mark" of co-ordination.[25] Central agencies responsible for enforcing particular principles or standards have been established in most countries.[26] In the 1970s, new central government agencies with environmental responsibilities, such as Ministries for the Environment, have been created in many countries. Environmental advocates have often sought to give these agencies strong formal powers to make them effective guardians of environmental goals or principles.

There are, however, various difficulties with this strategy. First, proposals for creating a central environmental agency with strong formal powers need to overcome institutional resistance and political reluctance. Institutional reform often generates opposition inspired by

[22] Caldwell, Lynton K., "Political Science", in Utton, Albert E. and D.H. Henning (eds.) *Interdisciplinary Environmental Approaches* (Costa Mesa, California, 1974), pp.5-18; see also Enloe, Cynthia, *The Politics of Pollution in Comparative Perspective* (New York, 1975), pp.323-324.

[23] Cotgrove, Stephen, *Catastrophe or Cornucopia: The Environment, Politics, and the Future* (New York, 1982), chapters 1 and 6. One strategy to overcome disagreement, conflict and opposition in connection with introducing ecological rationality is the imposition of a particular interpretation of ecological rationality by force. This, however, would no longer be co-ordination by common goals or principles, but an instance of co-ordination by power which has been labelled as "ecofascism". For a critique of this idea see Robert W. Hoffert, "The Scarcity of Politics: Ophuls and Western Political Thought", *Environmental Ethics,* Vol. 8 (1986), pp.5-32.

[24] Cotgrove, *Catastrophe or Cornucopia,* p.102.

[25] Minnery, "Modelling Coordination", p.255.

[26] Painter mentions economy, efficiency and propriety as the principles which underlie the role of central (hierarchical) agencies, particular Treasuries and government personnel boards. These principles are based on the "rules of the game" and on the need to keep government institutions functioning. See Painter, "Central Agencies and the Coordination Principle", pp.265-280.

bureaucratic rivalry and territorialism. Given the potentially all-encompassing nature of the environmental policy area, and the fact that responsibilities for aspects of the environment are spread over many government agencies, fears for bureaucratic imperialism by central environmental agencies are quite common. Institutional change is often hard to achieve and uncertain with regard to outcomes. Although it may have symbolic value for governments, the political rewards are often not great.[27]

Second, if a central environmental agency is created, the question arises as to what mandate it should receive. Given the breadth of the environmental policy area, and the dispersion of environmental responsibilities, it is not immediately obvious what role such an agency should be endowed with. Mandates may vary from responsibility for "hands on" management in one area, such as pollution control, to an advisory role with regard to all environmental policy issues. Mandates, it has been argued, can be too narrow, too broad or too ambiguous to be handled effectively.[28] An agency with too broad a mandate may become an unwieldy super bureaucracy, whereas a narrow or ambiguous mandate may also cause it to be ineffective. In other words, the demand for a "strong" central environmental agency begs the question what 'strong' exactly implies, what kind of formal powers should be allocated, and in what areas.

Third, there is the question of environmental ideology. Besides requiring that environmental rationality can be defined, the strategy assumes that a strong central environmental agency will use its powers in an ecologically or environmentally rational way. However, given the uncertainty surrounding this concept, central agencies are likely to promote their own version of what is "rational" or in the country's interest, a version that may be strongly contested.[29] Central agencies, it has been noted, are generally expected to promote functional values, such as rationality, efficiency, or propriety, but to be otherwise "value neutral".[30] However, it can be argued that, in practice, given the infeasibility of separating "instrumental" from other values, central agencies are not neutral, and cannot avoid making choices about values and goals underlying policy options. Given their central role, it has been noted that they are under pressure to perform "delicate balancing acts and arriving at

[27] Scharpf, F.W., "Policy Failure and Institutional Reform: Why Should Form Follow Function", *International Social Science Journal*, Vol. 38 (1986), pp.179-189; March, James G. and Johan P. Olsen, "Organizing Political Life: What Administrative Reorganization Tells Us About Government", *The American Political Science Review*, Vol. 7 (1983), pp.281-296.

[28] Enloe, Cynthia, *The Politics of Pollution in Comparative Perspective*, p.87.

[29] This point can be made with regard to Treasury in New Zealand, whose interpretation of what is economically rational and needed has become highly controversial.

[30] Minnery, "Modelling Coordination", p.255.

compromises between [. . .] multiple purposes and conflicting interests."[31] This is all the more likely to apply to central environmental agencies, given the often controversial nature of environmental issues and uncertainty surrounding the question of ecological rationality.

Co-ordination by power

Co-ordination by power is a less obvious strategy for environmental advocates. The use of this strategy assumes the existence of a powerful environmental advocate capable of forcing policy-makers to adopt environmentally desirable courses of action. Such an agency or group is unlikely to exist in the area of environmental policy, where power, given the broadness of that area, is generally widely dispersed. Environmental pressure groups may be influential, but are seldom in a position to impose or enforce policies or behaviour. Other interest groups, such as trade-unions, or political parties, may perhaps be more powerful at times, but cannot be relied upon to function as environmental advocates.

Environmental groups, advisory bodies, and government agencies can, and do, try to enhance their power. A central environmental agency without formal authority may exert power disproportionate to its formal status, for instance, by mobilising public support, developing good contacts, entering into alliances, receiving political backing from powerful ministers, or by building up a good reputation. Such strategies, however, are unlikely to put such an agency in a position of co-ordinator by power. The use of these strategies is more characteristic of a situation where co-ordination takes place in a situation without a central, dominant co-ordinator, a situation of (partisan) mutual adjustment.

Co-ordination by mutual adjustment

Co-ordination by mutual adjustment involves co-ordination on the basis of the diverse interests, values and goals of the actors ("partisans") involved, through such means as negotiation, bargaining, persuasion, threat and bribery.[32] By not requiring a central co-ordinator, this strategy avoids many of the problems related to the other three strategies. There is no need for developing common goals, for defining mandates of central agencies, or for concentrating power or authority. However, the strategy involves high transaction costs, requiring individual actors to put considerable resources into gathering information (about other actors), and into negotiations and other adjustment activities.

This strategy is not so much *chosen* by environmental advocates as much as adopted by default. If no common environmental goals have been formulated, if no authoritative environmental agency has been created, and if no powerful environmental advocate exists capable of

[31] Painter, M., *Steering the Modern State: Changes in Central Coordination in Three Australian State Governments*. (Sydney, 1987), p.191.

[32] Minnery, "Modelling Coordination", pp.255-258; Lindblom, *The Intelligence of Democracy*, pp.33ff.

enforcing environmental values in the policy process, environmental "partisans", inside and outside government, have few other options than trying to have policies adjusted on the basis of their own efforts.

The degree of success of an environmental advocate ("partisan") in achieving co-ordination by adjustment depends to a large extent on its power and resources relative to other actors, as well as on the adjustment strategies used. Adjustment strategies may involve education, persuasion, mobilisation of support, alliance building, lobbying, and the use of violence. Of all views of co-ordination, co-ordination by adjustment expresses most the political nature of co-ordination, in the sense of emphasising divergence, conflict, and exhibiting scepticism about such things as common values or goals, and the existence of a public or general interest. It therefore goes against the grain of what many environmental advocates feel environmental co-ordination is about.

In conclusion, substantive environmental co-ordination, although perceived by many environmental advocates and analysts as necessary for tackling environmental problems successfully, is very hard to achieve in political reality. Although environmental co-ordination on the basis of hierarchy is often regarded as a substitute for substantive co-ordination, this approach also encounters political and bureaucratic obstacles, and raises questions about substantive issues. Given the fact that environmental advocates are hardly in a position to impose or enforce desired behaviour, a strategy of mutual adjustment appears to be the strategy of environmental co-ordination by default.

In the following section the difficulties involved in environmental policy co-ordination will be illustrated in the New Zealand context. In particular, the focus will be on the agencies which have played a crucial role in efforts to co-ordinate environmental policy, the Commission for the Environment, in existence between 1972 and 1986, and the Ministry for the Environment, which replaced the Commission in 1986. First, the contribution of these agencies in developing a substantive basis for environmental policy co-ordination will be investigated. Then, their co-ordination role will be discussed in the context of procedural forms of co-ordination.

Environmental Policy Co-ordination: the New Zealand Experience

Efforts in substantive environmental policy co-ordination

The difficulty of introducing common environmental goals or principles as a basis for policy co-ordination is clearly confirmed by the New Zealand experience. Although some efforts have been undertaken in developing a more comprehensive, substantive environmental policy, these efforts have, so far, not been very successful.

Political support for the development of common environmental goals has been feeble at most. The National Report to the United Nations Preparatory Committee for the 1972 Conference on the Human Environment in Stockholm, describing the ad hoc approach to environmental issues in New Zealand, noted that this had not always been very effective, and that ". . . until recently, little thought has been given to defining national environmental objectives or implementing a national environmental policy by co-ordinating the agencies involved."[33]

Illustrative of the lack of success in New Zealand in developing a substantive basis for environmental policy co-ordination is the experience with the New Zealand Conservation Strategy. In 1980, the World Conservation Strategy was launched as a result of a concerted effort of the International Union for the Conservation of Nature (IUCN), the United Nations Environment Programme, and the World Wildlife Fund. The strategy formulated three main objectives: (1) to maintain essential ecological processes and life-support systems; (2) to preserve genetic diversity; and (3) to ensure the sustainable utilisation of species and ecosystems.[34] The strategy emphasised the need to integrate conservation and development in the policy-making process, advocated the adoption of anticipatory environmental policies, and proposed planning and "rational use allocation" as the integrating mechanisms for the implementation of such policies.[35]

The strategy called upon every country to "review the extent to which it is achieving conservation, concentrating on the priority requirements and on the main obstacles to them."[36] National and sub-national strategies were seen as a means of "focusing and co-ordinating the efforts of government agencies, together with nongovernmental conservation organizations, to implement the World Conservation Strategy within countries."[37] A series of steps and "strategic principles" were suggested to facilitate such implementation.

In New Zealand the Department of Lands and Survey, a member of the IUCN, had been involved in the drafting of the World Conservation Strategy, particularly through its Deputy Director-General of Lands, Bing Lucas. Lucas promised the IUCN that New Zealand would have a draft of its own national strategy ready for presentation at the IUCN General Assembly in Christchurch in October 1981. The Government then approved the preparation of a National Conservation Strategy.[38]

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[33] Environmental Council/Ministry of Works (no date), *The New Zealand Environment, National Report to the United Nations Preparatory Committee for the 1972 Conference on the Human Environment* (Wellington), p.17.

[34] IUCN/WWF/UNEP, *World Conservation Strategy* (Gland, 1980), section 1.

[35] IUCN/WWF/UNEP, *World Conservation Strategy*, sections 9 and 10.

[36] IUCN/WWF/UNEP (1980), *World Conservation Strategy*, section 8

[37] IUCN/WWF/UNEP (1980), *World Conservation Strategy*, section 8.

[38] P.H. Gresham, "Memo for the Commissioner", 8 May 1980, Commission for the Environment, File ENV 1/7, Vol. 1.

The Nature Conservation Council, as an advisory body to the Minister of Lands on conservation, and a member of the IUCN, was given the task of co-ordinating the preparation of the NZ Conservation Strategy. The Council called for a meeting of a small group of departmental officers to discuss a draft of a discussion paper produced by the Council.[39] In the discussion, the Commission for the Environment, then the central environmental agency in New Zealand, criticised the fairly narrow focus of the World Conservation Strategy on living resources, and noted that a conservation strategy had to be "an inherent part of a development strategy" in which, for instance, agriculture and forestry would be based on the principle of sustainability. The Commission also put question-marks behind the wisdom of large-scale ("Think Big") energy projects, particularly for the long term.[40] The Commission's submission was regarded by others in the working party as controversial and, as it was noted that the working party's report was likely to be a politically "sensitive document", a decision was made that the report would avoid criticising the Government's energy decisions.[41]

In June 1981 the working party's report, titled "Integrating Conservation and development — a Proposal for a New Zealand Conservation Strategy", was published by the Nature Conservation Council, and officially launched by the Minister for the Environment, Ian Shearer. The proposal discussed New Zealand's performance with regard to ecosystem protection, the provision for non-material needs (quality of life aspects), and sustainable resource use. Various gaps were identified, and options for improving environmental policy co-ordination presented, as well as a list of priority actions.[42]

That the Government was lukewarm towards the proposal became apparent in its neglect of the report. More than a year passed before the idea of developing a New Zealand Conservation Strategy was revived by the end of 1982, again on the initiative of the Department of Lands & Survey. The catalyst for the revival was the Government's desire to produce a "National Development Strategy" outlining its views on the future development of New Zealand. Inspired by his department, the Minister of Lands, Jonathan Elworthy, pointed out that the NZ Conservation Strategy had to be built into the proposed National Development Strategy as "an essential start in the process of resolving traditional

[39] A working party was established initially comprising representatives of the Department of Lands and Survey, the NZ Forest Service, DSIR, the Commission for the Environment, and ECO, chaired by Helen Hughes (DSIR). Representatives of the National Water & Soil Conservation Organisation were later added to the working party.

[40] Commission for the Environment, "New Zealand Conservation Strategy — Submission (Wellington, 1980).

[41] Commission for the Environment, New Zealand Conservation Strategy, "Notes of Tenth Working Party Meeting". 8 December 1980, File ENV 1/7 (Wellington, 1980).

[42] Nature Conservation Council, *Integrating Conservation and Development, A Proposal for a New Zealand Conservation Strategy* (Wellington, 1981).

conflicts related to the development of New Zealand's resources."[43] He also noted that: " . . . it is clear the proposal cannot be left to go into limbo. There at least has to be an acceptance or non-acceptance of the principles contained in the strategy document by the Government".[44] Following Elworthy's suggestion the Government formally "noted" the New Zealand Conservation Strategy proposal and agreed to refer the document to the ad hoc Cabinet Committee on National Development which was also responsible for the preparation of the National Development Strategy. At the same time, a steering committee to be convened by the Department of Lands and Survey was established to co-ordinate departmental reactions to the NZ Conservation Strategy proposal, and to prepare draft principles for such a strategy for consideration by Cabinet "for formal acceptance or otherwise".[45]

The feeble commitment of the Government and government departments to the development of a NZ Conservation Strategy was also reflected in the minimal resources that were put at the disposal of the core group of officials working on the NCC proposal. None of the officials worked full-time on the project, funding was inadequate, and meetings took place only once a fortnight. The steering committee recognised that progress was slow, implicitly referring to the apparent low priority given to this work.[46]

More important, however, is the fact that economic or development policies continued to be formulated separately from environmental goals or principles. The preparation of the National Development Strategy proceeded separately from the work on a Conservation Strategy. The Development Strategy was produced in 1983, when the preparation of a Conservation Strategy was still in full process. The Development Strategy paid only lip-service to environmental values, indicating that developers must be "prudent in the depletion of non-renewable resources", "recognise ecological principles", and "weigh the direct and indirect costs of any proposed development". However, no specific goals or priorities were formulated, which provoked the comment that the document could hardly be called a strategy.[47]

[43] Jonathan Elworthy, "New Zealand Conservation Strategy: Integrating Conservation with Development", 8 November 1982, Commission for the Environment, File ENV 1/7/1, Vol. 1, p.2.

[44] Jonathan Elworthy, "New Zealand Conservation Strategy: Integrating Conservation with Development", p.3.

[45] Secretary of the Cabinet, Letter to Minister of National Development and Minister of Lands, Commission for the Environment, File EVN 1/7/1, Vol. 1.

[46] It was indicated that the time core group members had available for the project was limited due to "workloads". "New Zealand Conservation Strategy Proposal Officials Committee Meeting", 29 March 1984, Commission for the Environment, File ENV 1/7, Vol. 4, p.2.

[47] Simon Terry, "Notional, Not a National Strategy", *National Business Review*, 5 December 1983.

A factor which is likely to have affected the lack of government commitment to the development of a NZ Conservation strategy was the fact that the proposal for such a strategy was not carried by strong public demand. The trigger for the NZ Conservation Strategy initiative was primarily external (the World Conservation Strategy), and was picked up in New Zealand by a government department. The level of public interest for the development of a NZ Conservation Strategy was not very high. Although the NCC document was subjected to two rounds of public submissions (in draft form, and as the June 1981 publication), only sixty-one comments were received altogether, more than half of which from Government departments and agencies, local bodies and large organisations. Most notable was the very low level of interest shown by organisations with development interests.[48] In 1983, Shearer, Minister for the Environment, noted that: ". . . the complete absence of any submission from a business house suggests to me that the proposal is not being accorded the serious consideration it deserves. Without the support of these organisations I do not see any future for the Strategy".[49] The problem was also signalled in the core group report, which remarked that "The strategy itself is only as important as the process by which it is developed". It was added that:

> Little is achieved if a conservation strategy is written by a single group in society under the misconception that they are producing the so called 'tablets of stone' — immutable laws which will be obeyed by all to come. Such a notion is nonsensical. Clearly, a strategy has greater overall effect on a larger number of society if it is regarded as a consensus or 'optimal' document, rather than being regarded as extreme and thus respected by a lesser number. Furthermore, it will need to be kept under ongoing review.[50]

Apart from these political obstacles, the efforts to formulate a NZ Conservation Strategy also demonstrated the difficulty of defining environmental rationality on a policy level, and of reconciling ecological and economic paradigms. This was reflected, for instance, in departmental submissions on the Nature Conservation Strategy proposal, in which various departments used the term "sustainability" in a sense which covered their own activities, stretching the meaning of the concept beyond the one used in the proposal.[51] The difficulty of reconciling ecological and economic paradigms was most pronounced in the conflicting views on the NZ Conservation Strategy expressed by Treasury and the Commission for the Environment. Treasury argued that the NCC document appeared: ". . . to place a heavy emphasis on the goal of conservation as an objective in its own right. Instead, it appears more appropriate to analyse the possible contribution of *some environmental services* [emphasis added] to improving the welfare of the community".[52] And noted that:

> Economic growth tends to facilitate the achievement of the community's priorities, including society's preference for a better environment. From an economic perspective, therefore, the focus should not be directed at how economic growth might or might not affect the environment: rather the question is how the use of resources to protect and improve the environment is to be reconciled with the competing demands on resources to satisfy people's other desires.[53]

Treasury concluded that:

> One important conclusion is that we do not necessarily do either current or future generations a favour by forgoing opportunities for development. The present New Zealand community is already experiencing stresses associated with low growth in the economy, while future New Zealanders are likely to have more wealth at their disposal anyway, for reasons which include the increased capital stock made possible by taking advantage of current development opportunities.[54]

The Commission for the Environment questioned Treasury's arguments. In the officials' committee which discussed the core group report, Helen Hughes, a representative for the Commission for the Environment, expressed concern that "market signals could be wrong from a conservation point of view", and said that she "found it worrying that treasury could not understand the concept of sustainable use".[55] Whereas in Treasury's approach environmental values were seen as values competing with other values within an economic paradigm, the Commission saw these environmental values as providing a basis (new paradigm?) for determining what is economically rational.

Given these difficulties, it is not surprising that the preparation of a NZ Conservation Strategy stagnated. Although in September 1983 the Government agreed to the holding of a national conference to involve a broader range of people in the discussion of a NZ Conservation Strategy, the conference did not proceed, due to national elections in July 1984. After the elections, in 1985, the process of developing a NZ Conservation Strategy came virtually to a standstill. Following Labour's election promises, the system of environmental administration came under review. Although the Government was urged by the Commission for the Environment to release an official statement reaffirming the Government's commitment to the development of a NZ Conservation Strategy, and the steering committee for the NZCS continued to function until early

[48] Gwenda Harris, "Interim Review of Public Submissions on 'integrating Conservation and development'", p.1, Commission for the Environment, File ENV 1/7.
[49] Letter Dr Ian Shearer, Minister for the Environment, to the Minister of Lands, 22 April 1983, Commission for the Environment, File ENV 1/7/1.
[50] "Report of the Core group to NZ Conservation Strategy Steering Committee", Commission for the Environment, File ENV 1/7, (Wellington, 1983), p.19.
[51] "Report of the Core group to NZ Conservation Strategy Steering Committee", p.7.
[52] The Treasury, "New Zealand Conservation Strategy Proposal: Integrating Conservation and development", Treasury Evaluation, 8 June 1983 (Wellington, 1983), p.1.
[53] The Treasury, "New Zealand Conservation Strategy Proposal", p.3.
[54] The Treasury, "NEW Zealand Conservation Strategy Proposal", p.14.
[55] "New Zealand Conservation Strategy Proposal", Officials Committee, Meeting 7 October 1983, Commission for the Environment, File ENV 1/7, Vol. 3.

1985, the issue was deferred until a new Ministry for the Environment would be in operation.[56] It was argued that because of the process of fundamental change in environmental administration "the responsibility for and content of, and even the need for a strategy [was] far from clear".[57]

In 1986, after the establishment of a Ministry for the Environment, the idea of developing a substantive basis for environmental policy co-ordination was again revived. The Ministry was charged with the development of a "New Zealand Environment Policy", and noted that the proposed policy: ". . . will clarify the linkages between environmental, economic, and social objectives and therefore be a guide, not just to the Ministry, but to most organisations whose actions affect the environment in one way or another".[58] It was added that the policy would be a "systematic identification of environmental policy objectives and methods for environmental management" and provide a basis, amongst others, for the selection of priorities.[59] However, the development of the policy received a low priority. Much of the Ministry's time was absorbed by the preparation and introduction of the Resource Management Act. Although the idea of a NZ Environment Policy was kept on the Ministry's research agenda for some time, it disappeared from there after the change of government in 1990.

It has been argued that, although the preparation of a NZ Conservation Strategy or Environment Policy was abandoned, the idea of environmental policy co-ordination on the basis of substantive environmental principles was not, but continued to play a role in a different context.[60] For instance, it could be pointed out that substantive principles, such as the sustainable management of natural and physical resources, underlie the Environment Act and the recently introduced Resource Management Act. The Ministry for the Environment, responsible for "balancing all values" attached to the environment, is required to take into account the values and principles incorporated in these acts when advising the Government.

[56] "Briefing Note for the Minister for the Environment", 22 August 1984; Letter Philip Woollaston, Under-Secretary for the Environment, to Mr George Porter, Pacific Institute of Resource Management, 12 August 1985, Commission for the Environment, File ENV 1/7, Vol. 4.

[57] Garratt, K.J., "Preparing and Implementing a National Strategy — The New Zealand Experience", Paper presented to the World Conservation Strategy Conference in Ottawa, Canada, June 1986, p.4.

[58] Ministry for the Environment, *Environmental Research Agenda 1989-1992* (Wellington), p.19.

[59] Ministry for the Environment, *Environmental Research Agenda 1989-1992*, p.19.

[60] ". . . many of the recommendations identified in the draft strategy have become part of the thinking of the Resource Management Law Reform". Williams, Tracy and Janet Ward, "The Draft New Zealand Conservation Strategy — Implications for a New Zealand Environment Policy Statement", Unpublished report for the Ministry for the Environment (Canterbury, 1989), p.12.

However, the Resource Management Act, although providing for an integrated approach to resource management on the basis of the principle of sustainability, gives no guidance for environmental *policy* co-ordination. Even though the Act gives the Minister for the Environment the power to issue national policy statements, it is not expected that this provision will be used very frequently, nor that it will be used for issuing policy statements on matters across policy areas.[61] The Act shifts much of the responsibility for formulating environmental policy to regional councils, who are required to issue "one" regional policy statement for the purpose of "providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resources of the whole region".[62] Also, the Act does not specify the implications of the principle of sustainability for policy development for such areas as agriculture, economic policy, transport, and energy policy, neither on a regional, nor on a national level.[63] Policies in these other areas may well continue to develop without regard for, and in conflict with, environmental principles or goals.

Feeble government commitment, the primacy of values and goals related to economic growth, the continuing predominance of the economic paradigm and analytical frameworks in the policy process, the difficulty of defining ecological and environmental rationality on a policy level, and the lack of a strong public demand for a comprehensive environmental policy, can all be identified as factors responsible for the fact that a substantive approach to environmental policy co-ordination has hardly surfaced in New Zealand. Although some efforts have been undertaken, the odds against them appeared, indeed, too high. Given this conclusion, the question arises whether, and to what extent, environmental policy co-ordination has occurred on the basis of other, procedural, strategies for co-ordination.

Co-ordination history: procedural strategies

In 1970, the Holyoake government rejected calls for the appointment of a Minister for the Environment (and a Department) on the ground that the environment was of concern to all ministers and departments, and that it would be both wrong and impracticable to concentrate the responsibility for the environment into one agency or person. Environ-

[61] The Act only prescribes the formulation of a national policy statement on coastal policy. Otherwise, national policy statements will only be issued on "matters of national significance", and it is expected that this provision will be used very sparingly. New Zealand Government, *Resource Management Act* (Wellington, 1991), pp.49-54. Eddy Goldberg, Ministry for the Environment, Personal Communication, 21 August 1991.

[62] New Zealand Government, *Resource Management Act*, pp.54-55.

[63] Minerals, including energy resources, are explicitly excluded from the Act, and dealt with under a separate Crown Minerals Act, which is not guided by the principle of sustainability.

mental policy co-ordination was seen as a task for Cabinet.[64] Nevertheless, in February 1970, the Government created a Cabinet Committee for the Physical Environment, chaired by the Minister of Works and Development. An Officials' Committee for the Environment was also established shortly after that to provide the necessary administrative backing.[65]

However, the world-wide upsurge in environmental concerns and demands since around 1970 also affected New Zealand, and environmental issues became electorally significant. The National Government and Labour opposition tried to outcompete each other in presenting environmentally friendly images, particularly in the year running up to the elections in December 1972. In February 1972 the Government, headed by John Marshall, decided to create a Ministerial Portfolio for the Environment, whose primary role was seen as the co-ordination of environmental policy.[66] In August of that year the Commission for the Environment was established to assist the Minister in his task.[67] The Commission, established by Cabinet directive, did not have a statutory backing, no formal powers, and no specific management responsibilities for any particular environmental policy area. The role of the Commission was described as follows:

> The principal functions of the Commission for the Environment are to provide advice and administrative support to the Minister for the Environment, to secure the co-ordination of Government policies in the environmental field, to initiate relevant new policy proposals for the consideration of the minister and appropriate Government departments, and to ensure that the Government takes full account of environmental factors when reaching decisions on major new developments.[68]

Given the lack of formal powers underlying its co-ordination function it seems obvious that the Commission was not in a position to exert co-ordination on the basis of the hierarchical control or central command model. Although being made responsible for the co-ordination of advice to the Government on environmental matters, the Commission had not received a control or reporting function analogous to the one allocated to Treasury or the State Services Commission for their areas of responsibility. This meant that other government departments could choose to ignore the Commission and that policy proposals, even those with major environmental implications, could reach the Cabinet table without the Commission having been consulted.

Being a newcomer to the bureaucratic stage the Commission encountered the reserved, guarded or even distrustful attitudes which are commonly associated with the establishment of new agencies in an established policy area. Although an era of "new" environmentalism might have begun in the early 1970s this did not mean that environmental responsibilities had not already been ingrained in the established bureaucratic structures. Vested bureaucratic interests had a significant input in the determination of the Commission's status and mandate, keeping it away from already existing responsibilities. Even the allocation of a new field of environmental responsibilities, the environmental assessment procedures, to the Commission did not take place without some fierce opposition from potential rivals.[69]

Ironically, the protective moves by existing bureaucratic agencies led to a situation in which the Commission found one of its greatest strengths: a very flexible, virtually open ended mandate. Not having specific responsibility for any particular environmental policy area, the Commission was able, in principle, to concentrate on any environmental issue of its own choice. As long as it could be demonstrated that existing policies and arrangements were unsatisfactory, the Commission could choose to bring issues to the attention of its Minister and the Government, and initiate a process of review. This role of the Commission was formally

[64] *New Zealand Herald*, 19 October 1970; *Auckland Star*, 19 October 1970, Commission for the Environment, File ENV 1/10, 7 December 1972.

[65] *New Zealand Herald*, 19 October 1970; Commission for the Environment, File ENV 1/0, 7 December 1972.

[66] Letter Duncan MacIntyre to Mr J. Howell, 19 September 1972. Although the responsibility of the Minister for the Environment was not formally defined, it was clear that improved co-ordination of environmental policy was one of the expectations associated with the job. MacIntyre declared: "I am responsible for co-ordinating the work of the 19 departments whose work has some effect on the environment." Speech notes (no date), File 1/0, Vol. 1, Commission for the Environment.

[67] Peter Brooks, the first Commissioner described the Commission's role broadly as "to secure the co-ordination of Government policies in the environmental field and to initiate relevant new proposals for the consideration of the Minister and other appropriate Government departments." Letter P.J. Brooks to Mr B.E. Halstead, 26 April 1973. Ian Baumgart, the second Commissioner wrote that the "Commission has been regarded by both Governments (National in 1972, Labour from 1972-1975, T.B.) as primarily an advisory and investigatory body and one able to exercise a co-ordinating role over the activities of the Government which have a bearing on environmental issues." I.L. Baumgart, "Briefing Papers for the Incoming Minister for the Environment", 4 December 1975, Commission for the Environment, File ENV 1/0.

[68] New Zealand Government, "Programme Statement of the Commission for the Environment, Estimates Commission for the Environment", *Appendices to the House of Representatives*, 1973 (B.7) (Wellington, 1973). This definition of the Commission's functions remained very much the same during the years of the Commission's existence. In 1974 the term "secure" was replaced by "foster" and by "promote" in consequent years, reflecting an admission that the initial expectations were somewhat too optimistic. From 1974 the Commission's function as "auditor" of environmental impact reports was also included in its programme statement.

[69] For an analysis of the establishment of the Commission, and the bureaucratic struggles on the definition of its mandate, see Bührs, Don, *Working Within Limits. The Role of the Commission for the Environment in Environmental Policy Development in New Zealand.* Ph.D thesis (Auckland, 1991), chapter 4.

strengthened in 1978 when the "overview" function of the Commission was confirmed by the Government.[70]

After the Commission for the Environment became fully operational, the Officials' Committee for the Environment, which was established in 1970 before the Commission was created, went into *de facto* recess. It was only now and then reactivated, especially on occasions when the role of the Commission for the Environment was under review, such as in 1980, when the Commission was under heavy fire from Cabinet after allegedly having exceeded its mandate by questioning the economics of a pulp mill proposal near Nelson.[71]

There are at least three reasons why the Officials' Committee for the Environment was not used more intensively by the Commission as a mechanism for co-ordination. First, it was not given the chair of the committee. This meant that the Commission was not in control of the agenda of the committee and that it developed a rather ambivalent attitude towards it. One of the longest serving Commission for the Environment officials noted that:

> There is no doubt that this [Officials Committee for the Environment], in its early days, was an effective mechanism for interdepartmental co-ordination. The committee continued after the establishment of the Commission but the relationship between the two was never clear. The Commissioner for the Environment was not made chairman of the Committee which remained in the hands of Bob Norman of the Ministry of Works and Development. The opportunity for the Commission to 'use' the Officials Committee as a co-ordinating mechanism was not effectively used.[72]

A second reason was the Commission's unfavourable experience with the committee in the early years, particularly in the case of the introduction of the environmental impact procedures. As a result, Peter Books, the first Commissioner, advised the Minister for the Environment to abolish the committee, noting that it was too large and that it "might have its use for those who cared to exploit its potential as a blocking device". He suggested that the Executive Committee of the Officials' Committee be expanded with a representative from Internal Affairs (Wildlife Division) "to balance the weight in favour of project-promoting departments" and that the chair be transferred to the Commission for the Environment.[73] With the Ministry of Works and Development remaining

[70] However, it was clearly pointed out to the Commission by the Secretary to the Cabinet that the emphasis given by Cabinet to the "overview" role of the Commission in May 1978, including the requirement of other departments to consult with the Commission, did not imply a "control function" similar to that of Treasury, the State Service Commission or the Ministry of Works and Development, and that this was to be avoided. P.G. Millen, Secretary of the Cabinet, Letter to Commissioner for the Environment, 19 January 1982, Commission for the Environment, File ENV 5/1.

[71] See for a discussion on this issue Buhrs, *Working Within Limits*, chapter 5, pp.204-205.

[72] Gresham, P.H., "Some Reflexions on the Origins, Evolution and Future of the Commission for the Environment" (Unpublished paper) (Wellington, 1983).

[73] Peter Brooks, "Briefing Paper for the Minister for the Environment", 15 November 1973, Commission for the Environment, File ENV 5/1.

in the driving seat of the Officials' Committee for the Environment, it is hardly surprising that the Commission for the Environment found it hard to take the initiative. Working relations with the Ministry were "not always easy". The Commission's faith in the committee was, of course, not enhanced when it was revived in 1980 when the Government wanted to "put the Commission in its place".

A third reason for not using the committee was that Ian Baumgart, Commissioner for the Environment from 1974 until 1980, preferred ad hoc interdepartmental meetings on specific issues above dealing with the Officials' Committee for the Environment: "I consider that ad hoc system is more flexible and more efficient than standing committees".[74] Nevertheless, he did not recommend that the Officials' Committee be formally disbanded. *De facto,* however, it ceased to function as a regular co-ordinating mechanism and was re-convened only sparingly since.

In July 1984, Ken Piddington, the third Commissioner for the Environment, drawing lessons from the past, noted in a briefing paper to the new Minister for the Environment that the Officials' Committee for the Environment could be a useful vehicle for co-ordination if chaired by a new Ministry for the Environment and "if you want it to act as the principal co-ordinator within Government on policy issues concerning the environment".[75]

Although in appearance, then, the responsibility for the co-ordination of environmental policy shifted from Cabinet as a whole to the Minister for the Environment, and from the Officials' Committee for the Environment to the Commission for the Environment on an administrative level, there was in fact little change. Environmental policy co-ordination continued to take place as before: by ad hoc deliberations between ministers, officials and agencies, often without the involvement of the Commission for the Environment. The Commission, although being made responsible for environmental policy co-ordination, was not given any formal authority to fulfil that responsibility.

Nor was the Commission in a position to co-ordinate environmental policy by power. With a staff counting less than thirty during most of its existence, the Commission had scarce resources. At times, particularly before 1976 and from 1979 to 1982 (the "Think Big" era), it was submerged by its "audit" responsibilities in connection with the environmental assessment procedures. It had to be very selective in the kind of policy areas it wanted to get involved in. Between its "fire-fighting" role (reacting to the initiatives of other organisations), its public education

[74] Ian Baumgart, "Briefing Paper for the Minister for the Environment", 27 February 1974, Commission for the Environment File ENV 1/0.

[75] Ken Piddington, "Briefing paper for the Minister for the Environment", 24 July 1984, Commission for the Environment File ADM 0/0.

(and information) role, and ministerial requests it could find little time for policy work.[76]

As the Commission did not have any direct management responsibilities for a particular policy area, it had to deal with other agencies whenever it chose to get involved in an issue. In other words, it was dependent on the co-operation, goodwill, and often also expertise of other organisations (primarily government departments) for effective progress in these matters.

Given the Commission's weak formal status and very restricted resources it seems inevitable that it had to resort to strategies other than formal control or the use of power to give substance to its co-ordination responsibilities. The Commission was only one actor in the field of environmental policy, and certainly not the most powerful one. In reality, the Commission was in a situation more akin to that described by the model of mutual adjustment, a situation where co-ordination does not occur via a dominant central agency. Given also the absence of common goals as a basis for environmental policy co-ordination, the Commission had few other options apart from relying on adjustment strategies to effectively influence the policy process. As a result, the Commission used three main adjustment strategies in trying to initiate and co-ordinate environmental policy: (1) gaining government support; (2) mobilising public support; and (3) relying on the "power of persuasion" in relations with other departments.

For a Government department, gaining government support for proposals is potentially the most effective way to boost power and force other actors into adjustment. This is particularly so in New Zealand, where there are few checks and balances on the executive. However, given the rather low level of government commitment to environmental issues during much of the time of the Commission's existence, and the relatively low ranking and effectiveness of the Ministers for the Environment during that period,[77] this strategy had little to offer to the Commission.

Mobilising public support for initiatives or proposals, including the power of their constituencies, is another option open to government agencies. Although the use of this strategy is constrained by the rules and norms governing the functioning of the bureaucracy, it is a frequently used means for pressuring governments or other government departments into action. Despite the fact that under the Westminster system government departments are expected to be neutral in the sense of being required to serve, over time, political masters of different ideological orientation, the use of this strategy is not uncommon. Also in New

[76] Commission officials estimated that only about 17% of their time was available for policy development. Bührs, *Working Within Limits*, p.221.

[77] As assessed by Commission for the Environment officials. See Bührs, *Working Within Limits*, pp.277-278.

Zealand government agencies often rely on the support of their constituencies in order to promote particular interests or views.

On a number of occasions the Commission for the Environment also used this strategy, for instance in the Wild and Scenic Rivers issue, and in the area of hazardous substances policy.[78] However, although the Commission was expected by the public to play the role of environmental advocate, there were also strong pressures upon it to take a more "neutral" position (both in its audit and public servant role). More importantly, there was the need for the Commission to be seen, in the eyes of other departments, as "credible, objective and professional" for its advice to be adopted. Even if public demands were well founded, the Commission had to avoid being seen as "siding with" environmental groups.[79]

The third strategy, using the power of persuasion, was the strategy most relied upon by the Commission. Much effort was put into developing good working relationships with other government departments. With some, such as DSIR, these efforts proved to be fruitful. With other departments, however, things ran less smoothly due to differences in environmental ideologies, departmental "territorialism" and rivalry, and personality clashes. In particular relations with sections of the Ministry of Works and Development, Treasury and other development oriented departments were regularly strained.[80] It appears that the "power of persuasion" was least effective in the relations with those departments whose formal responsibilities put them in a position of "promoters of development" and who were backed by development oriented and environmentally less sensitive governments or ministers. In the words of one of the Commissioners: ". . . the commission has had no problem in assisting willing clients; the unwilling party will however remain a problem, whatever the mechanism for environmental control".[81]

The image of the Commission as a "green" agency or environmental advocate ("partisan"), also affected its dealings with other departments, arousing negative feelings within other organisations, some of which considered the Commission as too "ideological" and lacking expertise. This image also undermined the Commission's credibility as a mediator in conflict situations (for instance, between environmental groups and other departments). Continuously, the Commission had to balance between the requirement of being an environmental advocate (expected by the public), and the need to maintain the image of objective expert. These

[78] Both issues have been examined in more detail in Bührs, *Working Within Limits*, chapter 8.

[79] Baumgart, Commissioner for the Environment from 1974 to 1980, noted that ". . . we certainly didn't see us as their [environmental groups'] voice in the system." Baumgart, I.L., Personal Interview, 7 December 1987.

[80] For an elaboration of this see Bührs, *Working Within Limits*, chapter 7.

[81] Commission for the Environment, *Annual Report for the Year Ended 31 March 1986*, p.3.

conflicting role expectations put a high demand on the diplomatic skills of the Commissioners. Not surprisingly, the Commission sometimes failed to meet the expectations of one side or the other.

Overall, then, the Commission was in a weak and difficult position to give consequence to its co-ordination responsibilities via procedural forms of co-ordination. It lacked the authority and power that would have enabled it to adopt a top-down approach to co-ordination. There were, however, also constraints upon the Commission's role as a "partisan" for environmental values in the process of mutual adjustment, given its scarce resources and the need to balance conflicting role expectations.

In many respects, the Ministry for the Environment (established in 1986), seems to be in a better position than the Commission to be able to rely on a procedural approach to the co-ordination of environmental policy. The Ministry has a statutory basis, clearly defined functions and responsibilities, and has been allocated a policy role. It has also got a "reporting function" to Cabinet with regard to departmental proposals which are considered to have important environmental impacts. It has more staff (about 80 in a permanent position), and more resources than the Commission had.[82]

In several other respects it appears that, since the establishment of the Ministry for the Environment, environmental values and principles have received a greater weight in the policy process. First, the practice of allocating "dual mandates", combinations of development and regulatory environmental (protection) functions, to agencies has been virtually eliminated. Whereas previously the environmental protection functions of government agencies with dual mandates allegedly suffered in internal "balancing acts", they are now more strongly represented by an environmental advocate, and weighed against other interests in a more open decision-making process.[83]

Second, and related to the previous point, the Ministry for the Environment is no longer the only voice for the environment in the policy process. A Department of Conservation, established in 1987, has become a formal advocate for conservation. There now are two ministers at the Cabinet table with major environmental portfolios, Environment and Conservation respectively. Besides that, a Parliamentary Commissioner for the Environment, as an independent officer of Parliament responsible for overseeing the functioning of the system of environmental administration, was created at the same time as the Ministry, adding to the other environmental voices within the sphere of government.[84]

[82] In 1988 the total permanent staff of the Ministry stood at 86 (compared to around 50 for the Commission), not including 24 staff attached to the "transitional functions" of the Ministry. Ministry for the Environment, *Corporate Plan 1988-1989*, p.22; 31-33. For the year 1988-89 the Ministry had a budget of about $70 million, compared to $2.2 million for the Commission in 1986-87. Even though the $70 million includes almost $53 million for "transitional functions", the remainder, $17 million, is still considerably more than what the Commission had available. Ministry for the Environment, *Report for the Year Ended 31 March 1989*, p.27. NZ Government, Estimates, *Appendix to the Journals of the House of Representatives*, 1986-87.

[83] Government departments which had "dual mandates" were, for instance, the Ministry of Works and Development, the New Zealand Forest Service, and the Department of Lands & Survey.

Third, from 1987 to 1990, the ministerial portfolio for the environment was held by a minister who was second in seniority, and at some stage even the Prime Minister.[85] If the ranking of ministers is taken as an indication for the relative importance attached to the portfolios they hold, environmental matters can be seen as having received a high priority during that period.

Fourth, the fourth Labour Government embarked on an ambitious programme of environmental law reform, resulting in the Resource Management Act, explicitly directed at integrating environmental, economic, and social values in resource management, and introducing sustainability as the key principle for the management of natural and physical resources.

Fifth, since the late 1980s a second wave of environmentalism has struck much of the world, including New Zealand. Support for environmental values has not only grown, but has also become much more mainstream, putting greater pressure on politicians to deliver on environmental issues, and strengthening the position of environmental agencies within the policy process.

However, whether these developments have led to a more successful integration of environment, economic, and social policies is debatable. It is not obvious that environmental values now receive a greater weight in the policy co-ordination process on a national level than in the past. Economic policies have continued to be formulated and implemented independently from environmental considerations, arguably even more so under the "free market" policy regime than under the previous "interventionist" regime.

Despite the fact that the introduction of the Resource Management Act, the centrepiece of the Ministry's work, signifies a major rationalisation of environmental legislation, and provides a basis for the consideration of environmental, economic and social values in granting approval to development proposals, it is not a guarantee for the integration of environmental, economic and social *policies*. At most, the Act is a

[84] Although the role of the Parliamentary Commissioner for the Environment has been compared to that of an environmental watchdog or ombudsman, it would appear that a comparison with the role of the Auditor General is more appropriate. The Commissioner, in her first report to Parliament, noted that "I will be endeavouring to establish strong links with the public and public interest groups but I have no desire to be seen first and foremost as a complaints authority. My office is not required to and does not have the resources to investigate all complaints." Parliamentary Commissioner for the Environment, *Report for the Three Months Ended 31 March 1987*, p.5-6.

[85] Geoffrey Palmer, who, in August 1989, took over from David Lange as Prime Minister.

starting point for the development of substantive environmental policies, depending on how local, regional and central government give consequence to the provisions under the Act, notably with regard to the development of national and regional policy statements. If such statements are not developed, to provide a basis for the integration of environmental, economic and social goals in policies and action programmes,[86] the Act will not signify a major break with the reactive approach to environmental problems characteristic of the past. Worse even, it could evolve into a new "fast track" procedure for development, depending on the weight given to economic interests and values in the balancing process.[87]

Whether the stronger position of the Ministry for the Environment has indeed led to a more effective role of the Ministry in environmental policy co-ordination, as a "counter-weight to Treasury"[88] in influencing government policies, is also uncertain. The Ministry cannot give directives to other government agencies, nor does it have a clear mandate to require other agencies to co-operate and/or to provide information and expertise needed for the development of more integrated environmental policies. Although the Ministry is somewhat bigger and better resourced than the Commission was, and has less of its resources tied to fixed or ongoing responsibilities (such as the audit role), it cannot be expected to master or acquire all the knowledge and skills needed for tackling such a task on itself. Despite the fact that the Ministry's reporting role requires that proposals with significant environmental implications are submitted to it before they are presented to Cabinet, there are still occasions where this does not occur.[89] Apparently, the Ministry also lacks the resources to carry out this role with respect to the Government's legislative proposals. Overall, the Ministry, like the Commission for the Environment, finds

[86] Given the uncertain future of regional councils, and the possibility that they might be replaced by Regional Resource Management Boards with a narrower focus, the likelihood that regional policy statements will function as mechanisms for integrating environmental, economic and social policies on a regional level, seems increasingly slim. At the same time, it is expected that very few national policy statements will be produced. See footnote 61.

[87] That an integration of consent procedures does not necessarily imply that a higher weight will be given to environmental values has been proven by the experience with the National Development Act in New Zealand, and similar "one stop" consent granting procedures overseas. See Rabe, Barry G., *Fragmentation and Integration in State Environmental Management* (Washington, 1986). Also, as noted earlier, the management of energy resources has been separated from the Resource Management Act, and is not subject to the principle of sustainability.

[88] The view of the Ministry for the Environment as "having an influential and demanding role as a counter-weight to Treasury", was expressed by Philip Woollaston, the Under-Secretary for the Environment. Philip Woolaston, "Speech Notes of Speech to South Island Local Bodies' Association Annual Conference", Queenstown, 2 October 1985.

[89] Ministry for the Environment, *Report of the Ministry for the Environment for the Year Ended 30 June 1990*, p.10.

itself in a position of having to rely on mutual adjustment strategies to bring about the integration of environmental values in the policy process.

It can be argued that another factor which may have been detrimental to the Ministry's effectiveness is the fact that it does not have a formal, or perceived, environmental advocate role. Instead, the Ministry has a position of "declared neutrality".[90] This may have prevented it from more effectively mobilising public support to strengthen its position in policy issues, a strategy which was used with some success by the Commission for the Environment. Such a strategy could also have stengthened the Ministry's position overall, by reinforcing its constituency basis. From its position of "declared neutrality" it is hard to depict who the Ministry's constituents are. If not environmental groups, or citizens concerned about the environment, who else? If it is everyone's advocate ("balancing all values"), then it is likely to end up as no one's in particular. Ironically, at a time when environmental concerns are at a new high (at the end of the 1980s and early 1990s), the new central environmental agency in New Zealand may enjoy less public support than its predecessor.

Overall, it can be concluded that both the Commission for the Environment, and the Ministry for the Environment, have been in a position of having to rely on mutual adjustment strategies in their efforts to co-ordinate environmental policy. Although the Ministry appears to be in a formally stronger position to bring about adjustment of policies to incorporate environmental values than the Commission was, it does not appear that this has resulted in the integration of environmental, economic, and social values in key policy areas, such as policies on economic growth, energy, transport, and agriculture. Policy development in these areas continues to take place on the basis of other interests, values and frameworks than environmental ones.

Conclusion

This paper has demonstrated that environmental policy co-ordination in New Zealand has mainly occurred on the basis of mutual adjustment, despite the existence of a central environmental agency. Efforts to develop a comprehensive environmental policy as a basis for substantive policy co-ordination have so far failed, largely confirming the political and theoretical difficulties ascribed to this form of co-ordination in the literature. Neither has there been a political will to establish a central environmental agency in a position of authoritative, hierarchical control, or with dominant informal powers.

The crucial factor affecting environmental policy co-ordination, it appears, is the degree of political commitment to integrate environmental values into key policy areas, such as economic policy, energy policy, and agricultural policy. The introduction of the principle of sustainability

[90] Ministry for the Environment, Establishment Unit *Draft Strategic Plan* (Wellington, 1986), pp.8; 18.

in the Resource Management Act is, in this regard, only a starting point. Whether this principle, or any other environmental principles, will have a meaningful effect on actual policy development, and the management of resources, depends on the relative strength of the advocates for these principles *vis a vis* the advocates for other principles and interests.

The weight of environmental values or principles in the policy process depends also on the capability of a central environmental agency to capitalise on growing environmental public awareness and increased government claims of commitment to the environment, and to translate this into effective policy proposals. Looking at the New Zealand context, it would seem that the performance of the Ministry for the Environment, although in a better position than its predecessor, the Commission for the Environment, falls short of the potential offered by the rising tide of environmental concern.

Three principal options for exploiting that potential can be identified. First, the Ministry for the Environment could, whilst continuing to rely on a mutual adjustment strategy, position itself more clearly as an environmental advocate, allying itself more directly with environmental interest groups and demands, and using and mobilising the growing power of the environmental constituency. This strategy seems to offer the best prospects of success with regard to specific environmental issues, in particular those where environmental concerns or demands are strongest (such as hazardous chemicals, pesticides, packaging/waste issues, and the Antarctic issue).

Second, the Ministry for the Environment, mobilising environmental support, could try to initiate institutional reform in order to become an *authoritative* advocate for the environment, notably extending its powers with regard to those policy areas which have a significant impact on the environment, such as economic and energy policy. Given the difficulty of achieving agreement on environmental goals, it can be argued that the only realistic way for ensuring that environmental values will be adhered to in the policy process is by giving the Ministry for the Environment an authoritative (hierarchical control) position. From this position, the Ministry would monitor and "audit" the performance of other agencies in respecting environmental principles, and in achieving environmental goals to be incorporated in their mandates.

Third, the idea of developing a comprehensive environmental policy, encompassing and integrating environmental, economic, and social goals, could be revived, despite the obstacles discussed earlier. The greater the support for environmental goals or principles becomes, and the more governments are pressured into incorporating such goals and principles into legislation and policies, the stronger the need to find out what this means in terms of achieving other, potentially conflicting, goals. Although the resolution of such conflicts is a matter for political decision-making, the search for common ground and acceptable options may be facilitated by the work of a government department such as the Ministry for the Environment.

To some extent, the Ministry has already shifted along the lines of the first option (for instance, on the Antarctic issue), without openly rejecting its "neutral" role. It is, however, debatable whether the present mandate of the Ministry, which requires it to "balance all values", allows for moving further in this direction. As for the second option, trying to establish an authoritative environmental agency, it is unlikely that, despite the growing support for environmental values, there is sufficient political willingness to put the Ministry for the Environment on a hierarchical control footing in the present political and economic climate in New Zealand. This would be regarded by many policy-makers as a return to "interventionism", a deviation from "free-market" principles, or as a potential threat to the priority of economic growth. Obviously, such reform would also generate strong opposition from affected government departments, notably Treasury.

Considering the fact that the third option does not require any immediate or significant institutional change, and given the political need to give further substance to environmental values in the policy process, the third option is likely to be politically more acceptable. Despite the possibility that developing a comprehensive environmental policy as a basis for substantive environmental policy co-ordination can generate or expose disagreement, it may be *seen* by many politicians as a mechanism for *resolving* conflicts.[91] In addition, such a policy would provide further guidance to local and regional government, and the private sector, with respect to the principles and provisions contained in the Resource Management Act. Also, given the Ministry for the Environment's position of "declared neutrality", it is in an eminent position to contribute to the formation of such a policy.

Ultimately, however, the decision on which strategy to adopt for environmental co-ordination, as well as on the substance of a comprehensive environmental policy, is a political one. A central environmental agency can only co-ordinate on the basis of the terms set by the Government. It cannot make decisions on how to integrate conflicting goals or values. Co-ordination is not a mechanism for resolving value conflict, and cannot be a substitute for hard political choices.[92]

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[91] This appears to have been the reason for the Minister of Lands to support the development of a New Zealand Conservation Strategy.

[92] Seidman, Harold and Robert Gilmour, *Politics, Position, and Power. From the Positive to the Regulatory State* (New York, 1986), pp.219; 245; "Co-ordination is a process of adjustment and not a mechanism for resolving fundamental differences in value or perspective." Molnar, Joseph J. and David L. Rogers, "Interorganizational Coordination in Environmental Management, p.104; see also Painter, Martin, "Central Agencies and the Coordination Principle", pp.265-280.