

How Well Sustainable Development Is Integrated into Environmental Policies? Case Study: Latvia

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Abstract. This paper looks at sustainable development integration in Latvia's environmental policy, focusing on assessment and analysis of normative, organizational and procedural policy integration instruments. This research is based on desk research and in-depth interviews structured along the lines of a focused conversation. The paper concludes that there is no formal policy integration process in place and main integration barriers lack integration procedures, conflicting interests of stakeholders and organizational fragmentation.

Keywords: environmental policy, policy integration, stakeholder participation, sustainable development.

I. INTRODUCTION

Sustainable development (SD), aiming to bridge environment and development, has become an integral part of governmental policies [0]. The key objectives of sustainable development are inter- and intra-generational equity, international justice, integration of social, economic and ecological requirements and participation of all stakeholders "in the process of strategy formulation and implementation" (Pathways to a Sustainable Future, 2001), as well as monitoring. Other sustainable development principles include long-term planning horizons, precaution, polluter pays, transparency and accountability, decoupling, environmental and cost effectiveness [0], [0].

Simultaneous application of these SD principles, integrating environmental, economic and social objectives is a precondition for successful sustainable development, highlighted by the Rio Declaration, Agenda 21 and different requirements on the international and national level. As the European Union (EU) Sustainable Development Strategy (SDS) states, one of the main challenges for sustainable development is "the non-integrated approach to policy-making" [0].

In many countries integration of sustainable development principles takes place in the constitution and in development strategies and plans. Since the 1992 Rio Summit the main strategy of sustainable development policy has been horizontal environmental policy integration (EPI) in sectoral policies and regulations such as energy, agriculture and regional development. This approach is important [0], as environmental policy alone does not assure environmental quality [0], [0].

This approach requires measurable objectives, clear responsibilities and reporting mechanisms (monitoring,

reporting and evaluation), as well as adequate organizational structures, capacity and resources. Academic research has been following this trend, and there is a solid amount of scholarly interest and literature on policy integration in various fields of governmental policy. This is not the case, however, for the literature on environmental policy.

However, so far, the concept of sustainable development policy integration has not been used in the scholarly literature addressing sustainable development integration in environmental policy. This is a serious gap. Sustainable development integration in environmental policy offers interesting conceptual and empirical challenges that would contribute to the policy integration literature. At the same time the practice of integrating sustainable development in environmental policy could benefit from analytical frameworks developed within EPI literature [0], [0], [0]. Some important elements are similar when examining EPI and sustainable development integration, such as normative, organizational and procedural structures, which should be addressed in both cases.

The aim of this paper is to examine aspects and processes of SD integration in environmental policy, by means of a case study of Latvia, highlighting the following questions: Does environmental policy reflect SD objectives and principles? What mechanisms and procedures are developed and implemented in environmental policy to support SD integration?

The next section describes the core analytical framework and methodology of the study. Section 3 gives an overview of sustainable development discourse in Latvia since 1991 when Latvia regained independence. Section 4 describes the normative, organizational and procedural structures of sustainable development policy integration in Latvia. The paper concludes with a discussion of the key findings and messages emerging across the paper.

II. ANALYTICAL FRAMEWORK

Scrase and Sheate [0] identify 14 characteristics of integration, starting from integrated information resources or integration across policy domains and up to integration among different assessment tools. Steurer [0] has grouped these policy integration approaches into 4 groups; all of them are important for sustainable development:

- integration of policy fields (economic, social and environmental policies – horizontal integration);
- integration of space (local, national and supra-national levels of policy making – vertical integration);

- time integration (short and long term horizons – inter-generational equity); and
- integration of governance modes – stakeholder integration.

Underdal [0], defines integrated policy as “one where all significant consequences of policy decisions are recognized as decision premises, where policy options are evaluated on the basis of their effects on some aggregate measure of utility, and where the different policy elements are consistent with each other”. According to March [0], highly integrated policies have to be characterized by a high degree of consistency between the various activities, as well as between the activities and objectives of specific policy areas; strong causal interdependence among policy components; and a high degree of coordination (structural connectedness) between the various actors and institutions associated with a specific policy area. Policy integration aims to improve effectiveness and to avoid conflicting objectives, so that a new policy is created bearing on individual policies that have specific characteristics and specific dynamics but in combination act in a different way [0].

These notions are used to draw the case-study specific definition of policy integration, one which defines sustainable development integration into the environmental policy as an early coordination between both policies involving different stakeholders, in order to ensure a high degree of consistency between objectives of both policies and to improve policy efficiency.

This paper is based on the project “Environmental Communication Instruments for Environmental Policy Integration” run by international non-profit organization REC-Latvia and the University of Latvia under the program “Environmental Policy Integration Program in Latvia” funded by The European Economic Area Financial Mechanism. It is based on desk research and participatory assessment methods: in-depth interviews and structured focus groups. Overall more than 30 environmental policy planning documents (guidelines, programs, plans and policies), regulations and stakeholder positions in the field of sustainable development and five environmental policy areas (air, water, earth, nature and climate) have been analyzed. Additionally two focus groups and 24 in-depth interviews have been carried out with representatives from four stakeholder groups: researchers, government policy makers (including politicians), business and NGOs.

There are two dominant strands in EPI discourse: normative and analytical [0], [0]. Normative debate focuses

on understanding whether the policy integration is desirable as such (what should be done?), whereas analytical discourse concentrates on the question of how policy integration is implemented in practice. The framework proposed by Lenschow & Zito [0] and further developed by Persson [0] integrates both discourses.

This framework has been applied in previous studies (e.g., [0], [0], [0]) and in the current empirical case study in Latvia. It focuses on integration arrangements which are frequently discussed in terms of their procedural, organizational and normative factors. Normative factors in policy integration include political commitment, policy coherence, embeddedness and acceptance. The organizational factors include arrangements such as inter-ministerial cooperation, multistakeholder working groups, secretariats and other structures set up to promote policy integration and formal mandates, accountabilities and allocation of resources. Procedural factors include rules and assessment processes put in place for policy development, implementation and monitoring, as well as sustainability assessment and indicators.

Research questions structured along these lines have been developed to shape the desk research framework and focus group interviews:

- Normative structures: political commitment, stakeholder and public support, coherence of policy principles and goals;
- Organizational structures to overcome sector compartmentalisation and support sustainable development integration: inter-ministerial and multi-stakeholder involvement, accountability mechanisms, capacity building, coordination and communication mechanisms;
- Procedural structures: mechanisms and procedures for sustainable development policy integration such as assessment tools and indicator reports.

III. SUSTAINABLE DEVELOPMENT POLICY DEVELOPMENT IN LATVIA

As elsewhere in Eastern Europe, the sustainable development process in Latvia has started with the collapse of the Soviet Union. The period of Latvia’s restored independence (from 1991) coincides with the UN Conference on Environment and Development, held in 1992 in Rio de Janeiro. Latvia as a new country participated at the Earth Summit and signed the Rio Declaration.

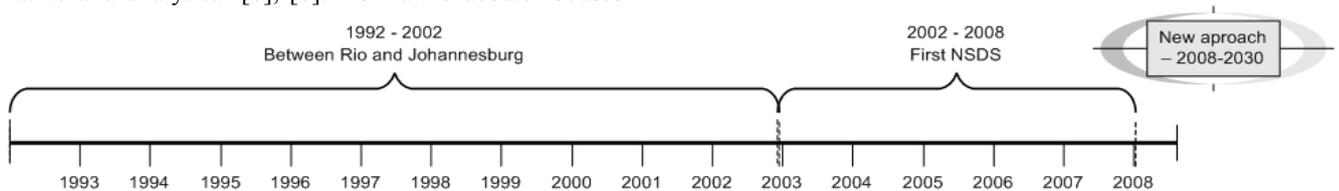


Fig. 1. Sustainable development policy cycles in Latvia

Three sustainable development policy-planning cycles in Latvia can be identified (see Fig. 1): (1) the period between

the summits in Rio de Janeiro and Johannesburg, (2) the development of the first national sustainable development

strategy (NSDS) and (3) development of the second NSDS.

Between Rio and Johannesburg

The first cycle started just after the Earth Summit in 1992 mostly focusing on the local level. The environmental protection requirements in the law “On Territorial Planning”, established voluntary and obligatory co-operation between municipalities in accordance with the administrative territorial reform process, but international bi-lateral co-operation programs and financing mechanisms stimulated Local Agenda 21 activities in all regions throughout Latvia. Experience gained from sustainable development pilot projects in Riga, Jurmala and eight municipalities in Bartava region shows that Latvian municipalities acquired the skills needed for sustainable development planning:

- incorporation of the first sustainable development concepts and strategies at the municipality level;
- methods for public participation;
- development of sustainable development indicators;
- elaboration of local sustainable development strategy and action plans; and
- testing of the first models for sustainable development action programs covering the various levels of local government [0].

However, Local Agenda 21 development commenced in only 20 out of 576 local municipalities in Latvia, mostly in cities, including the capital, Riga. Because of lack of governmental pressure and diminishing support from donor countries (mostly Scandinavia), progress in Local Agenda 21 development practically stopped.

SD planning activities on the national level developed slowly. An important milestone was the acceptance of the “Nation Environmental Protection Policy Plan for Latvia” (which included sustainable development as a goal) in 1995. Parliament ratified the “Convention on Biological Diversity” and the UN “General Convention on Climate Change”, and an agreement was concluded to form an association between the European Community and the Republic of Latvia. In 1996, Latvia, together with other Baltic Sea Countries, became involved in development of the “Baltic Agenda 21 Action Programme”. Together, these events led to the first national sustainable development strategy for Latvia.

First national SDS – formal requirement

Regional processes linked to the Baltic Sea intergovernmental cooperation and international commitments (sustainable development was one of the preconditions for EU accession) led to development of the Latvia’s first NSDS. It was developed in the top-down approach and adopted by government just before Johannesburg Summit (2002). NGO and expert involvement was limited and not timely, and the public was not consulted at all.

The Ministry of Environment prepared the NSDS, guided by the Rio commitments, UN national reporting guidelines, the Treaty of Amsterdam and the EU SDS (2001). The

NSDS used the three pillar approach (United Nations et al., 2003), strongly emphasizing the environmental and ecological aspects of sustainable development, yet it did not specifically provide for SD policy integration into the environmental policy itself.

Before the 2002 UN World Summit on Sustainable Development (WSSD) in Johannesburg, a multistakeholder SD Council was established in Latvia with the aim to “...promote the integration of sustainable development principles in the environmental, social and economic sectors, coordinating the sustainable development process, and facilitating public participation” [0]. Within one year this Council was abolished, replaced by the Common Economic Strategy and Development Council, which kept the same aim of three-pillar integration.

These councils approved several NSDS implementation reports and two SD indicator reports, covering a range of social, economical and environmental aspects. However these reports failed to give an overall picture and policy guidance for decision makers and the wider public, playing a more informative than policymaking role. Thus, the NSDS, perceived as a formal process closely linked to environmental protection, did not play an important role in setting a sustainable development policy.

New approach to participatory sustainable development policy planning

After the EU accession in 2004, Latvia started a new path searching process, resulting in “A Growth Model for Latvia: People First” (approved by the Parliament in 2005), defining a knowledge-based growth and human-centred long-term development scenario. This model advises “all the activities should strictly respect principles of unity, coordination and proportionality, only a steady and balanced development of all aspects will determine growth in quality of life. No one aspect should be left without attention, even in individual stages of growth” [0]. Consequently, it determines the need for a balanced, human-centred (anthropocentric approach) and growth oriented sustainable development.

Since the beginning of 2007, responsibility for sustainable development shifted from the Ministry of Environment to the Ministry of Local Authorities and Regional Development (MLARD), which was also responsible for promoting the National Development Plan 2007-2013. At the same time, the government adopted a new national planning framework. This framework put NSDS at the top of national planning documents. Thus, with the government’s mandate, MLARD began Latvia’s second long-term NSDS, extending to 2030.

In summer 2010, the Parliament approved *Latvia 2030* – the new NSDS providing a more horizontal integrated-capital approach to sustainable development, focusing on development of social and natural capital, competitiveness and regional development, as well as global environmental challenges. The capital approach, unlike the three-pillar approach used in the first SDS, primarily focuses on wealth

creation within planet's ecological limits with an emphasis on the correlation between environmental and economic systems [0]. The capital approach can be considered a step towards a stronger integration of environmental and economic sectors.

In contrast to the previous cycle, the new NSDS planning process was more open and participatory, characterized by brainstorming, peer reviews, on-line and off-line discussions and regional seminars, involving experts, entrepreneurs, NGOs, youth, general public. All these initiatives gave the strategy a higher legitimacy, built public ownership of the strategy and encouraged participation in its implementation. However, there was little evaluation or lessons learned from the previous cycles.

Latvia 2030 lays down a new institutional framework for SD governance, including establishment of new institutions, whose scope of responsibilities also includes SD integration into the environmental policy. One such institution is the Sustainable Development Commission, mandated to monitor implementation of the NSDS. In addition, the strategy also envisages the establishing of a Sustainable Development Institute. Its principal task would be to evaluate implementation of the National Development Plan and NSDS and report to the Cabinet of Ministers. However, two years after the adoption of the new NSDS, these institutions have yet to be established.

Currently, the body responsible for sustainable development issues is the National Development Council, whose aim is to assess Latvia's long-term strategic opportunities to ensure coordinated development planning and implementation of the SDS *Latvia – 2030*. This Council is attached to the Cabinet and it serves as a co-operation and opinion exchange platform. The Council is chaired by the Prime Minister and is composed of members of the Parliament, the Cabinet, planning regions, local governments, social partners and non-governmental organizations. Lacking a consultative character, the Council is dominated by development planning representatives with other groups under-represented.

Implementation of the new strategy has just started and it is too soon to judge its success or failures. The following sections discuss normative, organizational and procedural structures to support sustainable development integration into the environmental policy and beyond.

IV. SUSTAINABLE DEVELOPMENT POLICY INTEGRATION

a) Normative structures

Normative direction of SD integration calls for horizontal integration of policy documents and normative acts, synchronizing environmental and sustainable development objectives and principles. National planning in Latvia is regulated by the Development Planning System Law (APSL), whereby Latvia's long-term sustainable development strategy is hierarchically the highest legal act in Latvia. It means that all other planning documents should be in line with the objectives and principles set in the

national long-term SDS; it also determines that SD policy integration should not be limited to economic, spatial and regional development, but include environmental policy as well.

Sustainable development in APSL and the Law on Regional Development is defined in line with the Brundtland SD definition as development that will “provide quality environment and balanced economic development, rational utilization of natural, human and material resources and maintain and develop the natural and cultural heritage” for present and future generations. The Environmental Protection Act and the Environmental Policy Plan 2009 – 2015 (EPP) also refers to intergenerational equity defining SD as “integrated and balanced development of public welfare, environment and economy that meets the people’s current social and economic needs, and ensure environmental compliance, without compromising the ability of future generations to meet their needs, and ensure the conservation of biodiversity”.

TABLE 1
INTEGRATION OF SD PRINCIPLES INTO THE ENVIRONMENTAL POLICY

SD principles \ Environmental policy fields	Land	Air	Water	Nature	Climate
Decoupling and eco-efficiency	Average	Average	Average	Average	High
Polluter pays	High	High	High	Average	High
Precautionary principle	Average	Average	Average	High	Average
Intra- and Inter-generational equity	Low	Low	Low	Low	Average
Participation, transparency and accountability	Average	Average	Average	Average	Average

Principles of sustainable development are defined globally in the Rio declaration and other international treaties, and many of them are also incorporated in national planning and law. These principles are also partially integrated in Latvia's environmental policy (see Table 1). EPP and Law on Environmental protection refers to the polluter pays and precautionary principles, as well as environmental policy integration, stating that “environmental requirements must be integrated in all activities, ensuring that these activities are not inconsistent with the action necessary to reduce unwanted burden on the environment”. Participation, transparency and accountability principles are established in overarching legislation defining public participation in decision making and better policy in line with the EU regulation and paragraphs of the Aarhus Convention. However, principles of inter- and intra-generational equity are only partly integrated in climate policy, as well as pension and healthcare systems, but are largely missing from national environmental policy. The overall environmental policy

planning documents and regulations clearly do not integrate SD principles and objectives into the environmental policy.

SD and its principles are also rarely integrated into the environmental legislation. However, the aim of sustainable development is mentioned in several environmental policy acts, e.g., the law on special areas of conservation, the Water Management Law and Law on Genetically Modified Organisms refers to SD as the policy goal. Polluter pays and precautionary principles are integrated into the Environmental Protection Law, the Law on Pollution and the Law on Natural Resource Tax. Another fundamental SD principle is inter- and intra-generational equity, which can be observed in three policy areas. The first, the sustainable use of resources, especially in regard to non-renewable resources, is integrated into the environmental policy on natural resources (including waste). The second policy area concerns pollution and its prevention (the Law on Pollution), and the third – the conservation of biological diversity for future generations. However, short-term thinking at the household, corporate and government levels significantly restricts the application of these principles in practice.

The EU's Better Regulation program has also played a significant role integrating SD into the environmental legislation in policy objectives, improving the cost effectiveness of policy decisions, and contributing to the mutual integration of environmental, social and economic issues. This has been achieved by simplifying legal acts and reducing the administrative burden. Examples, also implemented in the Ministry of Environment, include changes in the Law on Pollution, providing for transition to open-ended permits and easing permit cancellations.

Organizational structures

Apart from the normative direction, organizational SD integration, including formal and informal organizational structures (e.g. advisory and scientific boards, agencies, coordination and auditing bodies), it is essential to promote and ensure co-operation, policy co-ordination and integration. Problems associated with organizational structures are usually attributed to organizational fragmentation, sectoral compartmentalization and tier responsibility [0]. Organizational integration can be implemented by building co-operation and by involving social partners and non-governmental organizations, ensuring inter-ministerial co-operation and involving other governmental institutions. In today's governance model, inter-institutional and inter-ministerial co-operation is mutually integrated. It is important to ensure adequate capacity of these structures and provide opportunities for interventions.

The traditional approach to policy integration and co-operation is establishing new coordinating structures, as can be observed in Latvia. As mentioned in the previous

sections, Latvia has experienced several SD coordination bodies shifting responsibility from one institution to another. Responsibility for policy integration at the governmental level is now shared between individual ministries; this should ensure compliance between NSDS and planning documents falling under its jurisdiction and the State Chancellery, which has responsibility to evaluate the mutual coherence of national-level planning documents (horizontal integration) and their compliance with the law. Nevertheless, public administrative structures lack SD integration advocates who would defend and lobby for integration of SD principles, objectives and tasks into sectoral policies and regulatory documents.

Improvements in inter-ministerial cooperation are one of the most important aspects of policy integration in Latvia. The State Administration Structure Law stipulates that public administrative institutions without hierarchical relations should perform their functions and responsibilities in cooperation. Such co-operation may take place through information exchange or through the participation by certain public officials in performing specific governance tasks, by giving their opinion or through other forms. Inter-ministerial co-operation takes place in the meetings of State Secretaries, where participants discuss draft regulatory documents. Interviewed experts recognize this practice as one of the most effective forms of co-operation. Such co-operation also takes place in Cabinet Committee meetings, where participants evaluate draft policy planning documents and review draft regulatory documents not yet coordinated among the institutions and without agreement at state secretaries' meetings. In addition, committees, councils, working groups and joint inter-ministerial (inter-institutional) meetings are formed and organized. Despite all the above extensive co-operation opportunities and forms, experts name weak inter-ministerial cooperation as one of the key obstacles to a broader SD integration into the environmental policy.

Apart from inter-ministerial co-operation, stakeholder involvement in forming, implementing and monitoring of the environmental policy is widely accepted [0], [0], [0], [0], [0], [0]. Participation of non-state actors is also essential for SD integration. In this regard, a stronger decentralization in policy implementation is advocated [0].

The State Administration Structure Law stipulates that government institutions may involve representatives from the public (non-governmental organizations and other organized groups, selected competent persons) in their activities by including them in working groups, consultative councils or by asking to give their opinions. Public participation in decision-making has become an important SD principle and standard practice, appearing in several of regulatory documents, including the Environmental Protection Law.

TABLE 2
COMPOSITION OF ENVIRONMENTAL MINISTRY CONSULTATIVE COUNCILS

Council\ Representative areas	Environment	Economics	Other
Climate Technology Co-operation Council		8 - representatives of professional associations	1 – Association of Local and Regional Governments
Environmental Consultative Council	20 NGO representatives		
Packaging Management Council	4 – representatives of structural units of the Ministry of Environment	1 – Ministry of Economy	1 – State Revenue Service
Environmental Science and Education Council	2 – Ministry of Environment		2 – Ministry of Education and Science 11 – University representatives
Water Resource and Technology Council	19 – representatives of structural units of the Ministry of Environment		
Environmental Protection Tripartite Co-operation Sub-Council	Ministry of Environment – 5	Employers - 5	Professional associations – 5

A number of public consultative councils attached to the Ministry of the Environment have been established. The most significant of these are the Climate Technology Co-operation Council, Environmental Consultative Council, Environmental Science and Education Council, Packaging Management Council, Environmental Protection Tripartite Co-operation Sub-Council, Consultative Council of Specially Protected Natural Territories, and the Water Resource and Technology Council. These councils consist of environmental experts from the Ministry of the Environment and its structural units, representatives of professional associations and environmental non-governmental organizations (see Table 2). Their main concerns are environmental issues, with economic (mainly business) issues being the second main area lobbied by businesses and professional associations. Although the consultative councils have stakeholder representation, they still lack strong SD advocates and representation of the social pillar.

In addition, there are also nine Consultative Councils of Specially Protected Natural Territories. The composition of these councils is more diverse, but they are also limited to the governmental, municipal and environmental NGO representatives. The Gauja National Park Consultative Council, for example, includes representatives of the Ministries of Transport, Agriculture and Environment, environmental NGOs (3), local governments (3), State Cultural Monuments Protection Inspection and the Nature Conservation Agency.

In addition, there are four river basin region consultative councils. Their objective is to co-ordinate governmental, municipal, non-governmental, and business and other stakeholder interests on the issues related to environmental quality objectives in the respective river basin region. Councils are also represented by sectoral ministries, local planning regions, non-governmental organizations and the business sector. They mainly deal with environmental issues and resolution of local conflict between

environmental and economic interests, leaving social issues integrated very poorly.

The formation of new structural units often turns out to be insufficient for ensuring policy integration, as these institutions are not interlinked and are fragmented in their work, and they operate in closed decision-making processes [0]. Many of the experts interviewed pointed to the importance of informal co-operation structures for ensuring the integration of various institutions and interest groups. The regional environmental agencies of the State Environmental Service, for example, organize annual meetings with business representatives, with participation of local governmental and environmental NGOs, but rarely with representatives from other areas. Good inter-sectoral co-operation also takes place within Civil Protection Committees, which are not directly related to the environmental policy but – at the regional level – is one of the rare meeting places for various public administration structures, providing an opportunity to discuss (at least on an informal basis) environmental protection issues and therefore ensuring a closer co-ordination among representatives of different sectors. In addition, in a number of regions meetings of Heads of public administrations still take place, with various regional sector representatives present.

Procedural structures

Normative and organizational structures alone cannot deliver SD integration into the environmental policy. There is also a need for mechanisms and procedures available for the methodological integration of sustainable development. Such procedures include policy analyses, sustainability assessments, scenario analyses, research studies, and indicator and risk assessments.

Policy assessment procedures, which could be used to assess environmental, social and economic impacts of regulations and planning documents on SD, are one of the most widely used instruments of methodological

integration. A policy impact assessment is also stipulated in Latvia's legislation. The Environmental Protection Act determines the assessment principle, stating that "any action or measure that may significantly affect the environment or human health should be evaluated before the activity or action is authorized or undertaken". However, it does not provide for wider sustainable development integration into the environmental policy.

The APSL anticipates the principle of assessment, stating that for "development planning and implementation of development planning documents at all levels of government an impact assessment is provided...". A similar need for impact assessments of the draft regulation is also stressed in the Environmental Protection Act, specifically demanding for impact assessment on sustainable development and the environment to be provided in the annotation of draft regulation. Impact assessments should also be included in the annotations of legal acts prepared for all the draft laws. These annotations help make better decisions, assess the impacts of laws in various fields of SD and help officials to improve quality of legal acts, entailing an obligation to examine the various possible legislative effects.

Procedure and guidelines for evaluation of potential impacts of planning documents and legal acts (excluding the Strategic Environmental Impact Assessment) recommend the consideration of impact assessments in 11 areas of policy concern, namely: use of scientific evidence, risk, the Human Rights Act, EU legislation, regulatory impact assessment – estimates the financial impacts of new policies on business, is unique in its mandatory status, environmental appraisal, 'rural proofing', equal treatment (gender, age, race and disability concerns), health, safety, and consumer impact assessment. Similarly also the instructions of the Cabinet on the "Order for Filling in Annotations of Draft Laws and Regulations" state that such assessments done provide information on impacts on macroeconomic environment (exports, imports, GDP, inflation, investment attraction), SMEs, health and environment, competition, consumer rights, innovation, energy, sustainable development, social situation and fiscal impacts on the state and municipal budgets.

Existing regulation in Latvia specifically does not refer to the sustainable development assessment. It merely determines the need to assess the coherence among the policies and examine impacts of draft regulation on business environment, social groups and environment. However, in practice, such impact assessments are never done, because the law does not prescribe cases where such an assessment should be carried out (these assessments are not compulsory and the need for such an assessment in each case is decided by senior officials at the Ministry), and because of lack of resources, capacity and knowledge needed for such an evaluation.

The completed survey of annotation of draft laws and regulations and expert interviews suggest that the Ministry of Environment does not prepare any additional impact

assessments while drafting legal acts. The interviewed experts also acknowledge that quality of annotations is very low and can differ significantly. According to experts, it depends both on the professionalism of the officials and degree of urgency of a particular document.

SD evaluation methods can also be used to evaluate impacts of projects and planning documents. Environmental impact assessment and strategic environmental impact assessment are currently widely used in Latvia to carry out ex-ante environmental impact assessments. Legislation on this issue indicates that assessment process should be done in accordance with sustainable development principles. However, in practice the impacts on sustainable development are not assessed. For example, the Strategic Environmental Impact Assessment Report for EPP 2009 - 2015 states that "the impacts on sustainable development in its broadest sense are impacts on social development, local government and regional economic development, rural development, industry, private property, cultural and historical situation, was not assessed".

Evaluating regulations, planning documents and projects, it is very important to compare and balance different values. Therefore, several experts have recognized the important role of the principle of proportionality in SD integration. This principle states that the instruments used to reach the goal should conform to the importance of objectives, i.e. there should be a reasonable balance between public and individual interests, when restricting the individual rights and legitimate interests. In accordance with the general principles of international law, an individual's interests may be restricted only when the vital interests of the public must be protected and any restriction of fundamental rights must be proportionate. These restrictions are reasonable only if no other means, which restrict fundamental rights to a lesser degree, would be as effective [0].

The principle of proportionality is also used to weight the environmental measures against the legal restrictions introduced to protect the environment. It has been repeatedly evaluated in the Constitutional Court of Latvia. The principle of proportionality should be applied, for example, to the environmental impact assessment procedures and when issuing pollution permits. Expanding the interpretation of the principle of proportionality in the sustainable development context could also be attributed to the need to ensure the proportionality between environmental, social and economic interests in the decision making process; that is, not only integrating these fields, but also balancing the pressures and impacts.

It is in line with the discussion on weak and strong sustainability (see [0], [0], [0]) and reflects the conflicting interests in society. Environmental Protection Act states that "an action or event that may adversely affect the environment or human health, even if it complies with all environmental requirements, is permissible only in case if the expected positive result for society as a whole surpasses damage to the environment and public". It requires that other interests must be balanced with environmental

concerns, but does not provide complete clarity on how to evaluate and compare these interests. There are also no defined limits for critical natural capital, whose depletion would not be permissible.

There are also other procedures for policy integration, such as cost-benefit analysis, risk analysis, health impact assessment, social impact assessment, which are used to evaluate social and economic impacts of SD. For policy coherence evaluation, it is also appropriate to use causal diagrams that link actions to the goals set. However, such additional evaluation procedures impose a burden on policy-making and therefore should be separately assessed to the utility. In such evaluations, it is important to assess the long-term policy impact and influence on inter-sectoral areas such as sustainable consumption.

Another key sustainable development integration mechanism is the use of performance indicators. According to Guidelines for the system of results and performance indicators for 2008 – 2013, policy planning documents should have specific objectives and performance indicators. These guidelines also define policy impacts, outputs and outcomes. For SD integration policy, impacts are the most crucial. They should demonstrate “changes in society (political, economic, social, cultural, environmental, etc.), which are affected by number of political results and external factors” [0]. However, impacts are the most difficult to define and evaluate. Interviewed experts and reviewed planning documents show that in practice sustainable development issues are not covered by these policy indicators, and the development of these indicators is seen as most problematic.

There are also several sustainable development indicator reports prepared in Latvian, covering environmental, economic and social aspects. These indicator sets are sectoral and are not supporting integrated approach outside professional and / or departmental boundaries. In addition, aggregated indicators, such as the ecological footprint or the material flow, could be used. Policy integration is also supported by benchmarking, which cannot guarantee political integration, but helps to track policy results, disseminate information about policy-making process and to illustrate different policy approaches. In addition to these measures, other economic parameters, such as the external cost estimates, can be used to strengthen environmental argument.

V. DISCUSSION

Underdal [0] wrote that despite the calls for integration of policies, explanations of what the policy integration really meant and how it could be achieved was unclear. Thirty years later not much has changed. Policy integration is still considered necessary, but there is a lack of understanding as how to provide it.

When discussing environmental policy integration in the UK, Jordan [0] and Weale & Williams [0] found out that the ‘hardware’, i.e. the organizations and the procedures of governance, and the ‘software’, i.e. the knowledge needed

to implement policy integration, were both in place but that the ‘electricity’, the political will, was lacking. In case of Latvia all these elements are in their infancy.

Although the need for sustainable development policy integration is stressed in a number of policy planning documents and regulations, there is no formal policy integration process in place, neither at the government level, nor at the Ministry of Environment. There is a lack of a clear legal framework for policy integration, and environmental planning documents and regulations do not fully reflect the international and national sustainable development objectives and principles. Short-term thinking at the household, corporate and government levels significantly restricts the time integration and the application of principle of inter-generational equity.

This case study illustrates evidence of introduction of new, more participatory governance modes in Latvia that open policy making, implementation and monitoring processes for non-state actors, and diversify the applied policy instruments. Nevertheless, effectiveness of the policy integration is highly dependent on normative factors, such as political commitment, traditions and norms, determining policy orientation. Normative factors have also been highlighted by other scholars ([0], [0]) as important for policy integration. At the same time, policy implementation is highly dependent on stakeholder support for policy integration as decision making processes are becoming more decentralized ([0], [0]) and on the capacity of the organizational structures.

The existing consultative councils do not cover all the stakeholders as the social pillar is under-represented. These councils act more as an advisory body to government but not as the platform for deliberation. Consequently, the role of the advisory councils in promoting the integration of sustainable development is weak and does not provide for further coherence of the policy objectives and principles. Public administrative structures and consultative boards lack sustainable development integration advocates who defend and lobby for integration of sustainable development principles, objectives and tasks into sectoral policies and regulatory documents.

Nevertheless, not only stakeholder integration, but also the mechanisms for inter-ministerial cooperation to provide for sustainable development mainstreaming in environmental policy are underdeveloped. It is determined by the fact that there is not a clearly defined responsibility for sustainable development integration into sectoral policies, and increasing sectorisation, limiting integration processes, remains a very strong governance element in Latvia.

Knowledge on policy integration is very limited, fragmented and not actively applied. The above-mentioned problems of normative and organizational structures also limit application of the integration mechanism. A voluntary approach to sustainability assessment does not ensure an evaluation of sustainable development impacts of environmental policy planning documents, regulations or

projects. But the political will is dominated by the economic growth paradigm and does not support a balanced sustainable development policy approach.

Application of the sustainable development policy integration instruments such as external cost analysis, and sustainable development assessments, would justify socio-economic benefits of environmental policy. It is relevant in an economic crisis, when an increasing pressure for economic returns and environmental concerns are often considered to be economically restrictive. Declining budget revenues decrease available financial resources for environmental protection measures, but in the long term, it has a potential to significantly increase the cost of reducing environment impacts and the negative consequences in the future. Thus, sustainable development requires a policy targeted on long-term benefits. Long-term policy implementation, especially in times of crisis, requires unpopular, politically problematic decisions.

VI. CONCLUSIONS

Latvia's dynamic 20-year transition from top-down governance to participatory policy making illustrates how the sustainable development policy integration depends on political will, stakeholder initiatives and SD integration into the environmental policy and other policy fields.

The main driving force for sustainable development integration has been and continues to be the European Union's environmental and sustainable development policies, largely determining coherence of Latvia's environmental and sustainable development goals. However, Latvia's sustainable development integration has also been significantly affected by accessibility and use of integration tools and methods, as well as individual factors, economic and financial constraints, institutional framework, capacity and political factors. They make the entire process vulnerable; implementation of sustainable development policy integration will be problematic if it is driven mostly by external (i.e. the EU) factors.

The main barriers for sustainable development policy integration in Latvia today include an incomplete legal framework, limited capacity (time) and motivation of state officials and lack of simplified sustainable development assessment methods and tool-kits of policy integration. Such tool-kits should consist of guidance, procedures, indicators and best practices to promote policy integration. It is also important to use integrated instruments, for example combining assessment tools and organizational structures, to implement participatory policy assessments.

Latvia's sustainable development integration is also limited by organizational fragmentation: weak inter-ministerial co-operation, limited multistakeholder participation and conflicting interests of stakeholders. These conflicting interests are usually part of the sustainable development debate, and from them the compromises

accepted in the political process arise.

One of the conclusions drawn from the study is that the sustainable development integration into the environmental policy would improve the quality of the environmental policy itself and, by demonstrating the importance of integrated policies and governance process, also stimulate EPI in the sectoral policies. The sustainable development integration would stimulate inter-ministerial and multistakeholder dialog and encourage a communicative approach to policy integration as described by Simeonova and van der Valk [0]. Nevertheless, although policy integration is an essential tool in ensuring the sustainable development, it is not an end in itself, but a necessary means, and, most importantly, it is crucial to ensure its implementation in practice. Consequently, it is essential to ensure not only changes in the planning documents, but to achieve real sustainable development improvements in the social, environmental and economic sectors.

However more knowledge, which has not been provided in the literature yet, is needed to assess the obstacles and benefits of sustainable development integration into the environmental policy. It is recommended to examine and to evaluate integrated environmental policy at different governance and political levels.

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Jānis Brizga. Cik labi ilgtspējīgā attīstība ir integrēta vides politikā? Latvijas gadījuma izpēte

Vides politikas integrācija jau gadu desmitiem ir daļa no politiskās un akadēmiskās polemikas. Tomēr praksē sasniegts maz. Politikas integrācijas novērtējumi vides jomā vienmēr ir koncentrējušies uz vides politikas integrāciju nozaru politikās, kā daļa no ilgtspējīgas attīstības integrētās pieejas. Taču šis raksts ir vērst uz ilgtspējīgas attīstības integrāciju pašā vides politikā, koncentrējoties uz normatīvo, organizatorisko un procesuālo politikas integrācijas instrumentu analīzi un novērtējumu. Pētījumā izmantota Latvijas gadījuma izpēte, un šī metodika balstās akadēmiskās literatūras, politikas plānošanas dokumentu un normatīvo aktu izpētē, kā arī padziļinātās un fokusgrupas intervijās, kas veiktas 2010. gadā EEZ finanšu instrumenta atbalsītā projekta „Ilgtspējīgas attīstības integrācija vides politikā” ietvaros. Pētījumā secināts, ka Latvijā politikas integrācija nav attīstīta, bet galvenās integrācijas barjeras ir integrācijas procedūru trūkums, pretrunīgās interešu grupu intereses un organizatoriskā sadrumstalotība. Vairāk uzmanības jāpievērš ilgtspējīgas attīstības novērtējuma izmantošanai vides pārvaldībā, kā arī jāveicina interešu grupu līdzdalība vides pārvaldības procesos.

Янис Бризга. Насколько хорошо устойчивое развитие интегрировано в экологическую политику? Исследование на примере Латвии

Политика экологической интеграции уже многие годы является частью политических и академических дебатов. Однако в реальности все еще достижений немного. Оценка политической интеграции вопросов охраны окружающей среды всегда ограничивалась только экологическим аспектом комплексного подхода к устойчивому развитию. Эта статья посвящена вопросам устойчивого развития по отношению к самой политике охраны окружающей среды, фокусируется на нормативных, организационных и процессуальных вопросах интеграции политики, их анализе и оценке.

Исследование проведено на примере Латвии, с использованием доступной академической литературы и методик, государственных документов планирования развития, а также на основе углубленных интервью и интервью с фокус-группами, проведенных при финансовой поддержке проекта ЕЭЗ «Интеграция устойчивого развития в экологическую политику» в течение 2010 года. Выводы исследования показывают, что политика интеграции в Латвии не развита. Основными причинами этого являются отсутствие процедур для интеграции, конфликтующие интересы разных групп и раздробленность организационной структуры. Больше внимания следует уделять оценке устойчивости для управления окружающей средой, а также способствовать участию заинтересованных сторон в регулировании процессов охраны окружающей среды.