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The Policy Transfer of Environmental Policy Integration: Path Dependency, Route Flexibility, or the Hungarian Way?

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Abstract

The idea of Environmental Policy Integration (EPI) and the policy tool Strategic Environmental Assessment (SEA) have come to the fore in European policy making over the past two decades. This article examines the introduction and implementation of SEA at national and sub-national levels in Hungary. It evaluates the factors affecting the process of international lesson-drawing in environmental policy based on empirical evidence. The article concludes that, just like in other policy fields, the process of lesson-drawing has been shaped and constrained by domestic governance structures and key endogenous factors embedded in socio-cultural settings. Structure and factors are featured by transience and path dependency at the same time. Hierarchical governance has the most significant influence on the process excluding voluntary forms of policy transfer hence resulting in the application of a stapled EPI, formal, instead of substantive transfer. Environmental policy transfer at the local level is problematic due to the low capacity and the lack of the financial means and human resources. It suggests that the EU principles of subsidiarity have been undermined. The article therefore makes an important contribution to understanding the key obstacles of (environmental) policy transfer. Additionally, reforming the theory of policy integration the author argues that beside the transactive, substantive and procedural aspects (the level of) path dependency should be taken into consideration to a better grasp of the effectiveness of policy transfer.

Keywords
Environmental Policy Integration (EPI), Strategic Environmental Assessment (SEA), regional development, policy learning

Introduction

The concept of sustainable development emerged in the 1980s and 1990s as a central element of regional policy. It became one of the most popular expressions in European development policies, promoting a new perspective on development contrasting with established development paradigms (Gendron 2014; Lafferty and Hovden 2003; Zaccai, 2002). The idea of Environmental Policy Integration (EPI) came to the fore with the progressive strengthening of environmental policy during recent decades (Nilsson et al. 2009). The 5th EU Environmental Action Programme advocated the assessment of the environmental impact on planning and regional policy, the consideration of environmental costs and benefits, the monitoring of environmental effects, co-operation with environmental authorities, and the public availability of environmental information (Lenschow 1997, 1999). By the middle of the 2000's, EPI had become an unavoidable element in regional development and cohesion policy. Further, the introduction of strategic

environmental assessment (SEA) transformed environmental interests into an integral feature of these policies (Nyikos 2014, Varjú 2013).

The EU's cohesion policy has been widely acknowledged as a major driver of reform for domestic regional policies, territorial governance systems, and policy practices aimed at supporting regional and urban development in European sub-national governments. However, there are substantial differences across EU member states, and especially amongst the Central and Eastern European Countries (CEECs), in terms of governance and socio-cultural characteristics, administrative cultures, knowledge and institutional settings, as well as the objectives and foci of regional policies (Duan et al. 2010; Ferry and McMaster 2013; Stead 2012), which all critically affect the pathways of influence of EU cohesion policy.

This article synthesises a multiyear and multilevel research effort on environmental policy transfer and learning, examining the introduction and implementation of SEA – as a key "flow" of policy transfer – at national and sub-national levels in Hungary. The study draws on elite interviews revealing the main actors and stakeholders, their knowledge, their learning capacity and the barriers to the adoption of new practices within domestic structures. Interview evidence has been supplemented with an analysis of country reports of the ex-post evaluation of environment-related ISPA/Cohesion Fund projects[1]. The procedural aspects of governance of concern for environmental policy learning are discussed. The article has a particular relevance to governance modes focusing on information exchange and process, but also to implementation more broadly because solid understandings about causal relations and knowledge about impacts of decisions are known to be critical to successful implementation (Nilsson 2009), hence to policy learning.

The aim of the study is to unfold the barriers to environmental policy learning showing the importance of the role of governance. To do so, the article relies on a series of researches, empirical investigations on a long-term period. After this introduction, the next section gives an overview on environmental policy integration, governance and policy learning. The following section assesses – with empirical evidence – the main barriers to proper environmental policy transfer. The concluding section argues that, just as in other policy fields, the processes of lesson-drawing in the integration of environmental policy into regional policy programmes have been shaped and constrained by the domestic socio-cultural backgrounds and the spatial scale.

Conceptual Approach

Environmental Policy in Regional Development

The primary aim of the European Community and its Treaty (in 1957) was to increase economic performance for member nations. There was no explicit provision for environmental policies, environmental agencies or environmental law (Cave and Blomquist 2008; Jordan 2005). The EC only started to be concerned with environmental issues around the late 1960s, early 1970s. The 'first explicit focus' was in 1972 at the Stockholm United Nations Conference (Cave and Blomquist 2008). The EC's environmental policy was formally founded through the European Council declaration made in Paris in October 1972, and the same year the EC adopted its first Environment Action Programme[2].

[1] ISPA/CF ex-post evaluation, WP D: Implementation and management (2000-2006/2010), led by Strathclyde University-Fraser Association. The Hungarian case was conducted by the author.

[2] https://www.eea.europa.eu/environmental-time-line/1970s

Since the 1980s, the evolution of regional policy has been inevitably accompanied by growing land use, emissions and environmental contamination. During the recent decades, the EU has made substantial progress in greening its regional development. In this sense – as Cave and Blomquist (2008) argues – the turning point was the Maastricht Treaty in 1992, which revolutionised policy making in the EU (including environmental policy), allowing for centralised environmental policymaking and providing a period of more stringent environmental policy for the entire Union (255).

The year of 1992 was important from the point of view of environmental policy progress in the EU (and globally, cf. UN Rio Conference). The Structural Fund reforms, the extension of cohesion priorities and the need for a paradigm change in environmental sustainability resulted in environmental policy having become not a standalone policy, but an integrated policy. The EU's 5th Environment Action Programme put integration of the environment into other policy areas at its core, and other important environmental policy instruments were conceived (such as the arrival of the Community-wide carbon energy tax proposal) and then additional pressures for "soft" instruments arose after the Maastricht Treaty (Jordan et al. 2003). (Later in 1997, the Amsterdam Treaty (entering into force from 1999) required for environmental protection being integrated in the definition and implementation of Community policies and activities, with a view to promoting sustainable development (Jordan 1998).

Besides the 5th Environment Action Programme, the development of the ex-ante evaluation and the rising crescendo of environmental policy (e.g. the Cardiff process, see Feldmann and Vanderhaegen 2001) brought forth the need for a separate evaluation tool for integrating environmental interests more deeply, hence the EU introduced the SEA in its Directive (2001/42/EC). The goal of this initiative was also to integrate environmental policy in an earlier phase of the programming–planning procedure.

In the 2000's, the EU continued to move towards what Weale et al. (2002) referred to as "ecological union", however, as Gravey and Jordan (2019) pointed out, there is a gap in significant dismantling of environmental policy at EU level, it had "become steadily more gridlocked" (10). They argue that the reason is rooted both in the symbolic nature of early dismantling attempts and the failure of more recent attempts to build coalitions that overcome institutional obstacles to policy change in the EU (Gravey and Jordan 2019, 1).

Policy Transfer vs. Integration

The transfer / diffusion / emulation / convergence of policies or "best practices" (e.g. Stead 2012), or lesson-drawing policy/social learning, etc. (cf. Evans 2019, 95, Dąbrowski et al. 2019, 53-54, Stone 1999) from different territories has become a standard feature of contemporary policy-making (Dąbrowski et al. 2019). Policy transfer from different territories can provide a solution to local problems for planners and decision makers (Healey and Upton 2010), whilst the 'soft' forms of transfer (e.g. spreading of norms) have also been taken into consideration in the literature as a complement to the 'hard' transfer of policy tools (Stone 2012). Dolowitz and Marsh (1996) distinguished two main forms of policy transfer: "voluntary" and "coercive". The latter can occur when "one government or supra-national institution [like the EU] [is] pushing, or even forcing another" to adopt a set of policy innovations (344). Besides the introduction of new policy innovations (like SEA) this has often happened when new members join a supra-national organisation.

According to the often-cited framework, policy transfer denotes how policies, administrative arrangements, institutions and ideas in one political setting (past or present)

are used in the development of policies, administrative arrangements, institutions and ideas in another political setting (Dolowitz and Marsh 2000, 5). According to Benson and Jordan (2011) policy transfer and the analogous concept of lesson drawing – after exponential growth between the late 1990s and mid-2000s – are now in a more mature phase. They also argue that "…instead of a discrete area of research, nowadays policy transfer is commonly employed in the analysis of broader phenomena such as Europeanisation…" (366).

Based on the work of Rose (1993) it is also common among scholars to assess the various degrees of policy transfer. It depends on the resources and time available, the definition of the policy problem and timing (Dolowitz and Marsh 2000; Ertugal 2018).

Policy transfer, however, can fail when there is a lack of structural conditions, knowledge or resources to make it work. Evans (2009) conceptualised the potential obstacles to transfer, distinguishing cognitive barriers (related to, for instance, a shallow understanding of the practice transferred), environmental barriers (related to the process of transfer, e.g. lack of platforms for transfer) and public opinion barriers (opposing transfer) (Dąbrowski et al. 2019). Dąbrowski et al. (2019) structured the barriers to transfer further: the disciplinary background of transfer actors; the geographical features of the regions involved; socio-cultural, socio-economic, socio-political, legal differences; the governance/decision-making background, and the level of technological development.

Having regarded the adoption of environmental policy and its integration of planning, some scholars emphasised the importance of the "performance" of environmental policy (Persson and Runhaar 2018). However, determining whether an environmental policy initiative is "effective" is problematic. The reason is that there are different types of effectiveness to consider (Theopilou et al. 2010). Sadler (1996) distinguishes three types of effectiveness (analysing environmental assessment as a policy tool):

- Procedural – Does the environmental assessment (EA) process conform to established provisions and principles?
- Substantive – Does the EA process achieve the objectives set, e.g. support well-informed decision-making and result in environmental protection; focus on the content of the problem?
- Transactive – Does the EA process deliver these outcome(s) at least cost, in the minimum time possible, i.e. is it effective and efficient? (Varjú 2013 cited Sadler 1996, 39; Partidário and Voogd 2004).

To consider procedural and substantive integration in planning by means of SEA, it is necessary to take into consideration the "depth" of integration. Partidário and Voogd (2004) defined four types of integration. In "full integration", environmental factors and concerns are an intrinsic element in the formulation of actions amenable to strategic decisions. In "environmental shape", assessment of the importance and magnitude of potential positive and negative effects on the environment is missing. In "concurrent assessment" and "stapled" integration, iterativity is totally missing. "Full integration" is the most desirable means by which sustainable development can be achieved (Partidário and Voogd 2004, 291–292; Sadler 1996)). The argument here is that full integration testifies successful environmental policy transfer whilst the others indicate some barriers.

The Role of Governance and Knowledge

The term of governance is applied to various changes in the process and meaning of governing (Heinelt et al. 2006). The modes of management, governance and the policy

process are mainly dependent on the actors involved in the process (Nilsson 2005), their behaviour, and on informal networks in the action arena.

The term of "Governance for sustainability" can be derived from the increased role of the concept of sustainable development requiring "new modes of governance" in order to integrate environmental interests into planning procedures (Lafferty 2004)[3], therefore, as Moreno-Pires and Fidélis (2012) argue (citing Bomberg 2004), governance for sustainable development can be defined as the set of institutionalised patterns for interpreting and pursuing sustainable development policies and goals (Moreno-Pires and Fidélis 2012, 609).
In this article – addressing EPI transfer across planning and decision-making levels – the basic modes of governance (hierarchy, market and networks, with special focus on the first and third) have been taken into consideration. Hierarchical coordination involves the centralised, formally organised exercise of top-down authority. Network governance modes allow for direct coordination among operationally autonomous, yet interdependent actors inside self-adjusting and often informal networks (Atkinson and Klausen 2011, 233-234).

The emergence of *post-traditional* knowledge societies has propelled human resources, continuous learning processes and knowledge itself into the role of a – if not the – core issue for sociocultural development (Matthiesen 2005, 1). Knowledge here is a cognitive operation entailing the improvement of capacities to act. The appearance, dominance and transformation of different knowledge forms (cf. Matthiesen 2005), accordingly the process of learning, depends on different governance arrangements (cf. Heinelt et al. 2006) and vice versa. Hence, the dominant "knowledge landscape/knowledgescape" (cf. Matthiesen 2005) and the knowledge in use by a socio-cultural entity (such as the actors of regional planning) have a important role in policy (environmental) learning/transfer (as well).

Policy transfer and governance

The aim of this article is to analyse the 'hard' (cf. Stone 2012) form of policy transfer where intentionality occurred with the potential elements of both voluntary and coercive processes (cf. Evans 2019). As Evans (2019, 94) argues, "policy transfer is one of the first modalities of transnational policy making undertaken by governments" and its analysis "provides insights into cultural styles of learning". This analysis addresses EPIs (focusing on SEA) as a transnational policy making undertaken by Hungarian planning and decision-making levels, using the basic modes of governance (hierarchy, market and networks, with special focus on the first and third) framing the action arena where transfer has taken place. Furthermore, using the approach of Dąbrowski and colleagues (2019) to barriers, the governance and decision-making structure is understand here as a barrier (and a culture specificity (see above Evans 2019), where divergent governance arrangements may undermine transfer, at least – as the author argues – its success in substantive understanding causing deflection in the original intention of a policy.

Materials and Methods

[3] There is an additional term which has often been used recently: environmental governance. This concept is closely related to the processes of collective decision-making that are deployed to protect the environment and resolve conflicts over natural resources (Tacconi, 2011; Paavola, 2007; Driessen et al., 2012, Van der Molen et al., 2016, p436)

The analysed materials of this article are based on the author's long-term research activity, on international and national projects investigating the governance and institutional changes of environmental policy (focusing on Hungary). Additionally, research surveys were conducted in four waves (2008, 2011, 2014, 2017 - see below) targeting all the local governments in Hungary, in order to reveal environmental policy integration into planning activities. The basis of this was the results of G-FORS research, whilst the other projects uphold and add relevant insights to the picture from different spatial levels.

Under the umbrella of the EU FP6 project (G-FORS[4]), the operational programmes of the National Strategic Reference Framework (NSRF) 2007–2013 of Hungary and their SEAs were analysed, focusing on the South-Transdanubian (NUTS 2) Regional Operational Programme (ROP). In the research project, (19) interviews were made with stakeholders and important documents (more than 50 legislative texts, minutes, plans) were analysed. One key aim of the G-FORS project was to investigate the extent to which different governance arrangements facilitated the bringing together of different knowledge forms to produce "better"/more sustainable policies and paid attention to how these orders and modes of governance differed in terms of their capacity to effectively coordinate the flow of knowledge into decision-making situations.

In the national project of OTKA (NK:104985[5]) the aim was to analyse the regional transition processes in Central and Eastern Europe. To do so, elite interviews were made (by the author) in Hungary (and Slovenia) focusing on the changes, especially in environmental policy appearance and functioning in regional development. The interviews were based on the first results of an online survey (conducted in 10 CEE countries) with 52 questions with 99 stakeholder answers.

In addition, the author conducted an online survey for local governments in Hungary The first wave was sent out in 2008 to all the local governments. Another wave (with the same questions) was sent out in 2011[6]. These questions focused on the appearance and use of SEA and environmental programming at settlement (NUTS 5) level. In 2014, under the umbrella of the ÁROP[7] and in 2017 in the KÖFOP[8] project, surveys for the local governments investigated – among other questions relating to public services – the orientation of settlement leaders towards environmental policy (e.g. waste management, environmental planning, nature protection).

This article revisited the results and reports of these empirical findings adding further individual investigations by the author, and gives a summary of the transfer and adoption of environmental policy (integration) after the systemic change(s) with a focus on Hungary.

Results and Discussion

Jurisdictional "Transfer" and its Territorial Patterns

Since the fifth EU Environmental Action Programme (EAP) identified the necessity of EPI, several straightforward steps have been taken in the field of the assessment of the

[4] G-FORS – Governance for Sustainability – Research Coordinator: Metropolitan Region of Hannover, Regional and European Affairs, Hannover

[5] New driving forces of spatial restructuring and regional development paths in Eastern Europe at the beginning of 21st century

[6] Similar surveys were conducted in Slovakia and Romania.

[7] ÁROP 1.1.22-2012-2012-001 project

[8] KÖFOP-2.3.3-VEKOP-16-2016-00001 project

environmental impact of policy and planning (Lenschow 1999). In the transitional societies of the 1990s, CEECs were also influenced by the significant reform of environmental legislation, including Environmental Assessment (EA). Basic EA elements were introduced in most CEECs during the 1970s (Cherp 2001), however, the transition resulted in changes that were influenced, certainly, by their sociocultural context. The different ways of building new political, economic and international regimes caused differentiation in the date of introduction and defined the adoption patterns of the elements of legislation.

At the beginning of 1990s there were significant regional patterns in the evolution of EA (Cherp 2001). In the majority of accession countries, EA legislation and practice has generally followed the EU legal provision, although "legal adaptation should be viewed as a necessary but not sufficient condition of institutional adaption" (Rees and Paraskevopoulos 2006, 181). The most important result of the legal introduction was the transparency of the process: rights and responsibilities were clearly defined. However, the speed of introduction and implementation/direction varied in different CEECs. Some leaders introduced a new environmental protection act and EA legislation earlier and also extended EA to policies, plans and programmes, while Hungary – from the first round of CEEC EU accession – was the last to introduce both (in 1995) (Table 1). Table 1 demonstrates that the first countries to introduce the new legislation were those that joined the EU at the earliest date and vice versa.

The reforms of the Cohesion and Structural Funds resulted in the Strategic Environmental Assessment (SEA) tool (in the 2001/42/EC Directive) as a realisation of a method to help planners and decision-makers to integrate environmental and sustainability considerations (policy) into planning activities. Concerning the directive, SEA should have entered into force in member states by July 2004 at the latest. Although some CEECs did implement SEA (e.g. Romania, Slovakia, Czechia), several governments had not enacted it in their legislation within the specified time (e.g. Poland, Hungary), with Slovakia being the leader. Afterwards, taking into consideration the interconnected key strategic documents, the National Sustainable Development Strategy (NSDS) was accepted (by the government) in Hungary in 2007, among the last in the EU. The problem with this delay was that this strategy would have been an independent tool for the SEA of the (2nd) National Development Plan (NDP) (and for its ROP) for the period of 2007-2013.

In the Eastern Central European Countries there are three main sources that define the tasks and obligations at the sub-national level. Firstly, the main laws on environmental and nature protection, secondly, the other sectoral legislation (e.g. waste management and planning legislation) and thirdly, the legislation of the regional and local governments (Belanka Cs. et al. 2010). Due to the previous legal basis, sub-national governments were required to take several measures into consideration. On the basis of elite interviews it was revealed that in a country with a small number of regional/local level units and a relatively greater size at the municipal level (or where settlements are organised into municipalities as in Slovenia), legislation may enter into force more easily than in countries characterised by a great number of small settlements with local governmental potential (Czechia or Hungary). In these countries, small local government "legal knowledge" capacity is usually lacking and the locally available human capacity only enables resolution of the most important local problems.

The Hungarian Way of Environmental Policy Learning

The Institution/Institutional Changes/Structuring

Rees and Paraskevopoulos (2006) argue that "it is often assumed that EC policy is a major catalyst for policy adaptation and institutional change" (179). EPI is such a policy. The EU, in its SEA or EIA directives, for example, does not precisely regulate the type of institutional structure needed. However, it describes and defines the framework of the processes determining the main (required) institutional elements. This implies that Member States have the possibility to construct their own "delivery system" for implementing EPI, nevertheless, they still have to fulfil the requirements of the directive. Therefore, the key to implementation/adoption of environmental policy is the national planning and development institutional structure.

The reorganisation of environment protection institutions was started in some CEECs, for example, even before the systemic changes. In 1988, in Hungary, environmental policy was placed under ministerial level direction to merge environment and nature protection with water management (Futó et al. 2006).

In CEECs, the reform of the early 1990s was aimed at strengthening the role of the sub-national levels, delegating governing and planning competencies and autonomy to settlements, municipalities, counties or regions. This process of "subsidiarity" was a source of opportunities and challenges/pressures in EU regional and environmental policy adoption. In Hungary, the "EU conform" policy-making structures for regional policy were established in the period of 1996-99, starting with the 1996 Regional Development and Physical Planning Act and was followed by the construction of the institutional system for the reception of PHARE and ISPA resources. The establishment of institutional systems was delayed in some cases (e.g. ISPA), which meant a delay in planning (including SEA) and project implementation as well.

Post-1990 (re)centralisation tendencies and their impacts in Hungary are widely discussed in spatial policy and governance literature (see e.g. Ferry and McMaster 2013; Pálné Kovács 2003, 2008; Pálné Kovács et al. 2004; Rees and Paraskevopoulos 2006; Varró and Faragó 2015). Following accession, planning and regional development activities focused on the absorption of EU funds in most CEECs. The effectiveness of management and implementation architecture between 2000 and 2006 was largely as required by Fund regulations, however, in the case of Hungary the delays in the construction of proper institutional structures, and the weakness of the preparatory stage had negative impacts on the implementation and management arrangements (Ex-post…2012).

In Hungary, the elaboration of regional plans, both for the period of 2007-13 and 2014-20, met the legal and personnel requirements of both the EU and the Hungarian central government. On the other hand, the newer and newer versions of the sectoral and regional plans – within and across the planning periods – followed the continuously changing central governmental expectations. For 2007-13, the ROPs were drawn up according to the "residual principle"[9], and their content was determined by the central planner. The government concentrated on the planning and implementation work at the NDA, and the ROPs were prepared in similar linear processes, even though local organisations played a significant role in the preparatory phase (Pálné Kovács and Varjú 2009).

For the new programming period (2014-20), the government replaced the regions (NUTS2) with the counties (NUTS3), but there was a hiatus in capacity building in the design

[9] Good planning ideas raised by regional planners were tailored into the national development plans, while the rest remains in the ROPs.

process, a number of them did not have the proper apparatus to develop their plans, and thus they had to group the resources available in such a way as to create plans of sufficient depth for the period 2014-20. Regarding the preparations for the 2014-20 period, the actors had changed, the management roles (managing authorities in the implementation procedures) were concentrated in ministries, so, accordingly, the hierarchical process continued to prevail in the preparations. As Varró and Faragó (2015, 55) describe, "spatial development in Hungary has been turned into an (even more) decidedly state-orchestrated field".

Processes for EPI

In Hungary, regarding the modes of interaction in the planning process of the SEA, preparations for the ROPs of 2007-13 were carried out in a solely formalised way. During the SEA public participation process, the NDA provided a multi-channel option for partner comments: partially on the website of the NDA and partially through a web interface. The planner (NDA), however, did not seek to establish stronger cooperation with the SEA makers and consultation partners, concentrating instead only on the proper "ready-made report". If we take a look beyond the formal procedures, it can be seen that the desirable philosophy of SEA has been injured from several aspects. First, those carrying out the SEA were not authorised to conduct direct negotiations with the various planning units (neither on regional nor on national level), only through the NDA (Figure 1). On the other hand, the SEA report was prepared after the conclusion of the public debate on the ROP and therefore its own debate was also delayed. The reason was that time management was not properly feasible, the time available for environmental assessment (including public debate) being very short (Varjú 2013, 342). Timing did not improve during the planning process for the period of 2014-20 either (Varjú 2015). (See Sandler's [1996] transactive effectiveness.)

Notwithstanding the above, the preparation of the Environment and Energy Operational Programme (EEOP) constituted an exception in the centralised, hierarchical management system in Hungary. The plan itself and its SEA were conducted in an iterative manner with proper time management and expert knowledge contribution, integrating Regional Environmental and Natural Protection Authorities into the network-style governing process of EEOP's planning.

The review of regional planning and its SEA tailoring processes during 2007-13 reveals the dominance of the hierarchical governance mode in Hungary. This hierarchical character was particularly visible in the relationship between central and regional decision-makers. While Regional Development Agencies and Planning Working Groups were formally involved in the planning process of the ROPs, their content was actually defined and determined by the central planner (NDA). The central state bureaucracy had a significant role, in which there was no place for bargaining or arguing (Varjú 2013).

Cherp et al. (2007, 633-634) argued that "...experts, competent authorities and various stakeholders ('the public') should provide input into the SEA process, whereas its findings should primarily be utilised by the proponent and competent authorities ('decision makers') who are the main strategic actors". However, in the highly bureaucratic and centralised Hungary, the role of the Ministry responsible for environment protection and its regional organs were not very strong or accentuated. The fairly low influence of their opinion was interpreted by the interviewees as a reason. As the head of department of the

environmental authority formulated: "*We have no voice in the strategies, if we are invited to the public debate fora, we may at best sit down but we cannot intervene in the discussion*."

During the discussed planning period in Hungary, the public debate of the National Development Policy Concept was a two-month procedure involving almost four hundred organisations. Nevertheless, participants complained about the one-way communication: in the majority of the fora the intentions of the government were introduced, and the debate was mostly restricted to why the recommendations could not be accepted. An argument was frequently used to conclude the debate: the European Commission did not allow something or required that something had to be included (Pálné Kovács and Varjú 2009). (What is interesting is that this narrative is here again, after 10 years, but in everyday politics.)

Post-1989, various fora were created in environmental policy in which local, regional and national communities, representatives of NGOs were theoretically able to participate in decision-making (Futó et al. 2006). As regards the Hungarian ROPs and its SEA, civil actors and the general public were given opportunities to express their opinion in a fairly formalised way. On the other hand, a number of the civil organisations were only able to participate through direct invitation. A leader of one of the civil organisations remarked that their request for involvement addressed to the minister was left unanswered. This actually implies that the planner had the chance to filter the actors involved. When asking NDA officers why this selection occurred, they referred to the jungle of civil organisations with weak legitimacy (Pálné Kovács and Varjú 2009).

The ROP and its SEA require specialised skills and information. Hence, none of the planning documents were easily accessible to the general public, referring once again to the somewhat technical language of European planning. SEA preparation was limited to state offices, the academic sphere, planning experts in local governments, and to some environmental NGOs with professional members. English language was also a filtering factor since some of the documents were not translated into Hungarian or only with great delays. These circumstances may explain why certain groups were conspicuously absent, and the interest groups were unable to put forward their own views in the disputes (Pálné Kovács and Varjú 2009).

A further important element to reconsider is the "centre-periphery" character. NDA staff characteristically failed to "travel down" to the regions, whilst local actors had to "go up" to the offices. Local knowledge, therefore, can be identified as a non-relevant factor (Pálné Kovács and Varjú 2009).

The makers of the ROP SEA were conscious about their own "rights" in the course of the reconciliations, but these "rights" could not be enforced against the planners since the latter possessed the "steering knowledge". In other words, the implementation of rules was more important than the integration of environmental interests into the plan, hence, SEA makers were in a "vacuum", and could not integrate their knowledge into the planning process. According to the SEA makers, personality and personal behaviour were more important elements in the process (e.g. to what extent the expert as a person is able to insist upon her/his arguments or the extent she/he is able to formulate proposals in a context which is pleasant and desirable for the planner as well). From the viewpoint of the author, this signals failure of environmental policy transfer. Despite the fact that SEA was successfully carried out, only "stapled integration" (as an indicator of failure) was realised instead of "full integration" involving successful environmental cohesion (Pálné Kovács and Varjú 2009).

Preparation for the 2014-20 planning period was in delay again in Hungary. The reorganisation of regional development actorship, the redefinition of tasks, and the protracted clarification of roles reiterated that a substantial part of EU planning was launched in the second half of 2013, accompanied by the lack of capacity and expert knowledge, repeatedly facing those affected at a heightened pace and with extremely short deadlines. Although there were many facilitations in the new planning cycle, the design documents were modelled, and had to be prepared based on the delayed design, which also affected the time management of the SEA procedure as well. (In 2013, during the same period, the Polish design, learning from mistakes similar to those of Hungary, with well-prepared plans drawn up in time, provided the opportunity for an in-depth, broad and professional public debate) (Varjú 2015).

Environmental Policy Transfer and Integration at the Local Level

A dominant issue Hungary has been facing in relation to the adoption of EPI concerns the sub-national, local level. Regarding the results of the mentioned researches, three quarters of Hungarian settlements had no prior knowledge of SEA (which has not changed over time). This fact pointed to a potential defect in environmental policy integration, and in the transfer of skills and knowledge at this level. Although at the national level, the Environmental Ministry makes efforts to fulfil EPI, at the lower level of territorial (and decision-making) hierarchy its impact cannot be detected. Regarding the size of settlements, it can be stated that greater settlements usually make major efforts to assess environmental impacts, however, the vast majority of the municipalities have not conducted SEA to date. According to the answers in the questionnaire conducted in Hungary, there are several reasons for this of which the lack of information is the primary reason. Lack of sufficient financial resources for the environmental appraisal was also reported. Half of the local governments carrying out a SEA for a certain plan used the budget of the plan as a resource for that purpose and assigned the task to the plan-makers. As regards the lack of information, the absence of knowledge led to an admitted misunderstanding. Some of the settlements thought that a SEA was not necessary because there was an Environmental Impact Assessment (EIA) at the end of the process. On the other hand, several local governments declared that the SEA and Settlement Environmental Programmes were one and the same. Certainly, this was false information. Some of the respondents thought that the SEA should have been delegated to upper decision-making levels (in the case of county, regional or national development plans) (cf. Varjú 2010, 2014). In Hungary, over 3200 local self-governments have been assigned local spatial and sectoral planning and development tasks since 1990 (e.g. local environmental protection plan). As Rees and Paraskevopoulos (2006) pointed out, the great number of settlements (3154 in 2015) was thought to be negatively affecting the coherence of regional programming and its environmental assessment.

The "death" of the Hungarian EPI?

Hungary, as in the past, has recently become an increasingly centralised unitary country where, especially subsequently to the systemic change, medium tier governance became the weak point (Pálné Kovács and Varjú 2009). As Pálné Kovács and her colleagues (2004)

pointed out, the mentioned predominant role of central actors, especially after the amendment of the Planning Act, and the relative weakness of local institutional actors in the decision-making process (see above) resulted in the increasing role of political parties and party-dominated clientelism as the main characteristics of regional policy-making processes (Pálné Kovács et al. 2004; Rees and Paraskevopoulos 2006). From 2011, the series of reforms on local governments have led to a further weakening of their role.

The new planning period of 2014-20 resulted in changes and more centralisation in the institutional frameworks in Hungary. The process of regional planning was transferred from Regional Development Agencies to County Governments, creating a direct link for the "streaming of party-ideas" from central towards county governments. The former role of the Managing Authority (of EU Funds) of the National Development Agency was taken over by the Prime Minister's Office, while the role of intermediate bodies was also transferred to sectoral ministries. The latter step increased the number of tasks without proper capacity building. In addition all these centralisation steps allow for increasingly higher control over the redistribution of EU Funds, pushing the interests of environment to the background. In the latter case, only coercive actions (pushed by the EU) have been taken. (A recent example of this is the legislative introduction of the EU requirement for banning single-use plastic from 2021.)

In Hungary, the Green Authority[10] would have been one of the most important actors in EPI as an independent body with professional experts. The role of the authority and its regional bodies was to control investments and development activities as an environment authority, and, in addition, to take part in programming as an expert actor in order to ensure EPI. However, as pointed out by Kohlheb and Pataki (2011), national governments have systematically divested national and territorial green authorities of their independence and competencies since the beginning of the 2000s.

The total loss of independence of "street-level environmental policy" occurred in April 2015 with its integration into government departments with direct links to politics. Afterwards, territorial green authorities are reorganised almost every year, which affects both the territorial competences (basically meaning fragmentation) and the institutional structure (with fewer and fewer competences). The situation of the Environmental Ministry was similarly frightful. After more than 20 years of independent functioning, the Ministry was integrated into the Ministry of Agriculture as a State Secretariat in 2010. Post 2014, it functioned only as a deputy state secretariat and since 2018, as a state secretariat. Apart from environmental protection, a continuous dismantling can be seen in nature protection as well, with a huge cut in expert capacity at Ministry level in 2018.

[10] Formerly known as National Authority for the Environment, Nature Protection and Water Management, with regional authorities.

The results of the centralisation and institutional/capacity cut back processes in Hungary were revealed by the OECD (2018) in its Environmental Performance Reviews report as well. The main challenges concerning environmental governance and management is the limited role of the private sector and the shortage of local capacity, which is partly caused by the increased management role of central government and environmental responsibilities at the central level. As a result, public involvement on draft environmental legislation and the public's environmental awareness are limited. The OECD's recommendation introduces sector-specific regulations, strengthening the implementation of SEA, promoting green business practices and encouraging public debate (Varjú et al. 2018, OECD 2018).

Conclusion

The article examined environmental policy and its integration with a special focus on Hungary. The investigation shed light on the processes through which national structures absorbed EU requirements. The article also illustrated the main obstacles to environmental policy transfer. Just as in other policy fields, the processes of lesson-drawing have been shaped and constrained by domestic institutional and governance structures (as was expected) and the knowledge in use.

Although the change of regime took place almost 30 years ago, it is not disputed that the Hungarian government structure and mode of operation carry the signs of transience and path dependency at the same time. A manifestation of the drastic transformation of the political party system from the initial multi-party systems towards a bipartisan system, then a 2/3 majority dominance, which led to the emergence of sharp political divisions, reducing conflicts by consensus and then creating a weightless conflict. Another important feature of the system is the highly centralised structure of the past thousand years, which may be explained by state traditions, which became even stronger especially after 2010. The local level is problematic as a result of the low capacity of local authorities, the lack of financial means and human resources. This finding suggested that one of the EU principles, subsidiarity, had been undermined.

The hierarchical governance modes excluded numerous actors. (Furthermore, it resulted in discrepancies in the transfer of SEA/environmental policy both in the substantive and transaction sense. Environmental policy has been implemented, SEAs have been conducted, however, EPI facilitated only 'staple' or 'concurrent' assessment instead of 'full' environmental policy integration.

Looking through the past 30 years three main phases may be identified in environmental policy learning. After the modernisation of environmental institutions the first phase came with EU accession. The phase is often referred as Europeanisation. This process was mainly hallmarked by copy-pasted elements. The second phase, after accession, was characterised by the continuous changing of the institutions, which sometimes hampered the adoption of environmental policy elements and caused delays in environmental policy implementation. As Stead and Pálné Kovács (2016) argued, "more recently, there are signs of new governance models emerging in some European countries (e.g. Hungary, Bulgaria, and Romania), partly as a result of the recent economic crisis and the accompanying social tensions, which are moving away from neoliberal models of governance towards greater bureaucracy and centralisation of governments" (31). The recent post crisis phase characterised by continuous cuts in both the capacity and independence of environmental institutions and accompanied by centralisation, resulted in the low level of

environmental policy implementation and integration. This suggests that although there were several attempts (e.g. Europeanisation or EU accession) and perturbations (e.g. financial crisis), path dependency is a significant factor in governance arrangements, which is one of the greatest barriers to substantively successful environmental policy transfer. Hence, (level of) path dependency can be an independent factor of a successful policy transfer.

The case showed that governance has significant role in this. Concerning Dolowitz and Marsh's argumentation (1996, 344), policy transfer encompass both 'voluntary' and 'coercive' forms of practice, noting that the latter can occur when "one government or supra-national institution [is] pushing, or even forcing another" to adopt a set of policy innovations. However, as this article showed, the coercive form is not necessarily caused by the 'pushing'. The mix of 'voluntary' and 'coercive' forms in adoption depends on the receiving entity (not only on the 'pushing' agent). Among others, Evans (2019) and Dąbrowski and colleagues (2019) emphasised the importance of barriers to transfer that may cause failure. This article argues that a certain (i.e. centralised) governance arrangement – on the recipient part of the transfer – can indeed undermine transfer (in a substantive manner) causing deflection of the original intention of a policy. The reason is that the centralised government arrangements do not allow 'voluntary' actions (e.g of the SEA makers), and in long term the lack of capacity (due to over-centralisation) may enforce this process.

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Table 1: Environmental protection acts and legal acts on EA in some CEECs.

Country	Year of adoption (Env. Prot. Act; EA legisl.)
Bulgaria	1991; 1993
Croatia	1994; 1997
Czech Republic	1991; 1992
Hungary	***1995; 1995***
Poland	1997; 1995
Romania	***1995; 1996***
Slovakia	***1994; 1995***
Slovenia	***1993; 1996***
Estonia	n.d.; 1992
Latvia	1991; 1998
Lithuania	1992; 1996

Source: Cherp (2001)

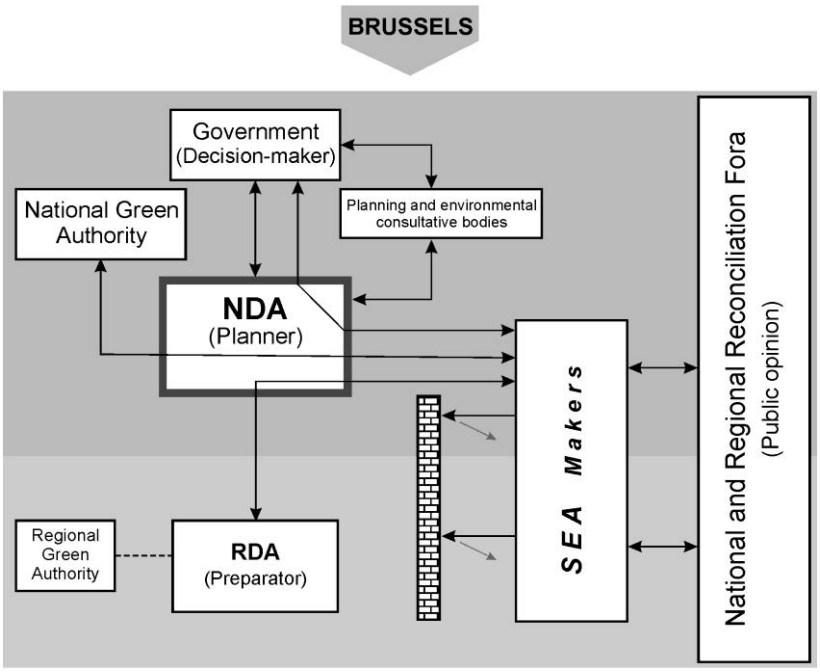
BRUSSELS
Government
(Decision-maker)
National Green
Authority
Planning and environmental
consultative bodies
NDA
(Planner)
SEA Makers
National and Regional Reconciliation Fora
(Public opinion)
Regional
Green
Authority
RDA
(Preparator)

Figure list

Figure 1. The SEA procedure and the interaction between players of the action arena
Source: Based on the interviews, own compilation.