

# The Accessibility of Target Populations

## Consequences for the Design of Environmental Policies

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### 1 Introduction

Until the mid of the eighties environmental policies in the Netherlands were characterized by a separate approach to each environmental sector, a very low participation of policy target populations in the policy making process, optimistic and therefore ambitious goals, and direct regulations (permitting) as a dominant policy instrument. These policy characteristics seem to be related to a lack of orientation of policy makers on policy target populations (a weak commitment) and on a lack of structured contacts between both (a weak interrelatedness). In more theoretical sense we might expect that in a combination of weak interrelatedness and weak commitment there is a tendency among policy makers to hardly resist ambitious goals and to force behavioral changes by means of a regulatory stick. On the other hand, a combination of strong commitment and strong interrelatedness probably will lead to resistance of policy makers to goals which require ambitious behavioral changes of the target group. This is more the case for a target group serving policy making institution, for example a ministry of agriculture which has to incorporate environmental policies. In such a situation a preference is expected for instruments that support the target group by stimulating innovations and by creating conditions which will help the target group to maintain its economic strength (Bressers and Kuks, 1992).

It is since the mid of the eighties that the Dutch ministry of the environment tries to shift its policy strategy between these two extremes from a rather isolated policy making position to a situation in which target groups are more consulted in the policy making process and in which stimulation of selfregulation by target groups is experimented as an alternative steering approach. This shift is part of an effort of the environmental ministry in the eighties to construct integrative perspectives on which the formulation of policy goals and the choice of policy instruments could be based. One of such integrative perspectives was to formulate environmental problem based themes, like the acid rain problem, in order to evaluate policy efforts on their contribution to the reduction of this environmental problem type. However each integrative perspective has its limitations: actions which are good to reduce the acid rain problem might be bad in relation to another part of the environment. For example farmers which

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are changing the way in which they apply fertilizers by directly working the manure into the soil in order to reduce ammoniac emissions into the air, create new problems from a groundwater quality point of view. Therefore, besides a 'theme oriented policy approach', a 'target population oriented approach' was developed as another integrative perspective in order to deal with integration problems at the level of policy target populations (and as a third integrative perspective even an 'area oriented policy approach' has been developed).

However due to a target population oriented approach policy makers do face new problems concerning the accessibility of target populations. Since some populations are hardly organized as a group, it is difficult to get access to them through intermediary groups or representatives. And in case that populations are organized as a group, some groups are more homogenous and therefore better to understand than other groups which are more heterogeneous and therefore performing a greater internal variety. In this paper we intend to show the consequences of the accessibility of target populations for the design of a target population oriented environmental policy. At first we present an overview of the way in which in the Netherlands a target group policy has been developed for industries as a rather accessible population. Secondly, we discuss the problems that will arise when a target population is more diffuse, by using environmental policies that are targeting on consumers as an example. For both types of target populations we conclude which consequences their accessibility has for the characteristics of the policies designed. As far as the target group policy for industries is concerned we also discuss to what extent it might be successful and to what aspects of this policy we need to be critical.

## 2 Developments in Dutch Environmental Policy

### 2.1 *The seventies*

The policy with regard to environmental care within firms, introduced by the government during the late eighties, can be seen as a necessary response to the experiences which were acquired with environmental policy in the early seventies. The development of environmental legislation during the seventies was an attempt to respond quickly and forcefully to the growing awareness of the seriousness of the environmental problem. In the light of the fact that many sectors of society (and the corresponding Ministries such as Economic Affairs, Agriculture and Traffic and Waterways) were still far from being convinced of the seriousness of the environmental problem, the young Ministry of the Environment (the then Ministry of Environmental Hygiene) had little choice but to opt for a relatively isolated development of environmental legislation. In view of political pressure to do something about the environmental problems quickly, this appeared to be at any rate a forceful, and as such, initially also politically satisfactory response. Thus the strategy of environmental policy during the seventies was characterized by an individual approach per environmental compartment: a limited role of target groups in policy-making, optimistic and ambitious objectives; licensing systems as the dominant policy instrument (Bressers, 1991, p. 13).

Harsh reality proved to be considerably more obstinate, however, than the (relative) simplicity of the legislation process. The implementation and enforcement of the licensing systems, which allotted important tasks to the local authorities (the provinces, water board and municipalities), worked out differently than was expected. Thus an evaluation study about the functioning of the Nuisance Act showed, for instance, that many organizations that were under obligation to have a license did not in fact have such a license, that in the organizations that did have a license licensing regulations were often inadequately formulated or obsolete, that compliance with the licensing regulations was insufficiently verified, and that in cases where violations were found, often no sanctions were imposed (Berenschot, 1982).

Explanations for the disappointing effectiveness of environmental legislation were first sought among the local authorities that were charged with its implementation. Over the years they had been given an increasing number of tasks in the areas of licensing and enforcement, while the civil apparatus that was charged with these tasks hardly increased at all in proportion to this. This led to a major backlog in the issuing of licenses, and often there was insufficient time to adequately customize the formulation of regulations. In addition it appeared to be physically almost impossible to check firms permanently or periodically with a high frequency. This would make checks highly labor-intensive and expensive. Partly because of this regulations tended to become obsolete in organizations where conditions changed.

The fact that regulations were often inadequately formulated can also be attributed to a lack of expertise on the part of civil apparatus with regard to the specific situation within the various organizations to which the licenses are supposed to apply. After all, one cannot expect an environmental official of a municipality to have a complete insight into how the air emissions of a galvanic firm should be regulated, and at the same time understand the noise pollution problems of a potato-peeling machine in the local potato salad plant.

Furthermore, an important explanation for this lack of effectiveness was attributed to the limited influence of target groups on the legislative process, which resulted in the fact that too little support was obtained for the policy. It is not all that difficult to stipulate by law that a firm without an adequate license should be closed down, but to see to it that the municipality actually takes such a decision and then successfully implements it is quite a different matter. Environmental policy did not have enough in-depth support to be taken seriously by the sectors that were addressed, or the means of power to simply force a change in behavior without such support. It is significant in this context that environmental policy has long had a 'soft' image.

## 2.2 *The eighties*

Particularly since the arrival on the scene of Winsemius (originally employed as a business consultant) as Minister of the Environment (1982-1986) attempts have been made to change the image of environmental policy. First action was taken to improve the implementation and enforcement of the licensing process. This involved creating possibilities for municipalities to receive a financial contribution from the state for the executive tasks with which they were charged in the context of environmental policy. This money could be used both to add to their capacity and for additional training of their environmental employees.

Action was also taken to develop universal regulations for certain categories of firms with relatively straightforward environmental problems (such as car garage firms). No individual licenses need to be issued to such firms anymore; notification by the firm in question is sufficient, after which the universal regulations (as laid down in a General Order in Council on the basis of the Environmental Control Act) apply. Because licensing was replaced by a notification obligation, which put the initiative with the firm, implementation in such cases can be limited to simply enforcement.

Furthermore, on the basis of the simple argument that people will only listen to you if you are prepared to first listen to them, starting from the early eighties serious consultations were begun with various target groups of the policy on the basis of equality. It was hoped that such consultations would increase public support of environmental policies. After all, the target groups (represented by their central organizations, such as the branch associations in business and industry) get the opportunity to influence the objectives of the policy. On the other hand, they do commit themselves to the eventual results of the negotiations (laid down in covenants). Because although these are gentlemen's agreements on a voluntary basis, compliance with these agreements is not quite without obligation. These agreements can even be formalized by the licensing institutions at the decentralized level in the form of license regulations.

Another important aspect of consultation with target groups is that better use is made of the know-how that they possess, for instance regarding specific aspects of the production process in a certain industrial branch. After all, the know-how that is required in order to realize a reduction of environmental pollution may be largely found with those who caused this pollution. Environmental problems are often so complex that one-sided steering by outsiders is often doomed to failure. This gives licensors the opportunity to limit themselves to regulations with regard to the objectives that have to be realized, while previously much use was still made of means regulations which precisely instruct an organization how it is supposed to deal with a certain environmental problem. Means

regulations only stipulate the final situation which has to be achieved. The licensee himself can determine how this situation is to be achieved. Since here negotiations so far have dealt only with objectives, the target groups are also forced, during these negotiations, to make a realistic assessment of what they feel is feasible.

In addition, an important function of negotiations with target groups is that they may lead to interiorization. Interiorization can be seen as a process where those who contribute to the development of environmental problems (the target groups) recognize their own responsibility for the environment and, on the basis of this recognition, take their measures to reduce environmental pollution at their own initiative. Thus, interiorization can be combined with more room for self-regulation. The government is faced with a role where it has to indicate what the minimum requirements are, while target groups in society have to assess what else they can achieve on the basis of their own responsibilities. Another advantage of this is that dependency on licenses as an instrument is reduced, while the scope of the policy is broadened and the policy becomes less vulnerable. To make ambitious objectives feasible, it makes sense not to 'put all one's eggs in one basket' (that of licenses), but to leave one's options open.

Another reason for the development of target group policy lay in the fact that sectoral legislation proved to involve many adjustment problems. Thus, measures to reduce emissions into the air which are taken on the basis of one law may result in more emissions into the water, which should precisely be prevented by means of another law. This confronts firms with conflicting demands. These contradictions could be solved by setting up an integral approach at the level of industrial branches or individual firms. Target group policy is seen as the best way possible to accomplish this adjustment or 'integration'.

Since the outlines of target group policy were sketched in the National Environmental Policy Plan (1989) a beginning was made with the application of this policy in practice. Naturally, it is important here which target groups are being distinguished. In practice the following classification is used:

- agriculture;
- traffic and transport;
- industry;
- the energy sector;
- refineries;
- construction;
- waste utilization firms;
- consumers and retail trade.

It will be obvious that these target groups are of a rather different character. Thus, for instance the target groups 'energy sector' and 'refineries' are far more homogeneous than the target group 'industry', which basically consists of a conglomerate of various target groups at the level of branches of industry. Thus individual target group policies are developed for each target group.

### 3 Dutch environmental policy for the target group industry

Since the end of the eighties the Dutch government has been trying to develop a two-track environmental policy designed specifically for the target group industry. On the one hand the government wants to follow a stimulation policy which gives firms the chance of self-regulation. With this the government hopes to achieve that firms will not just follow the lead of the government, but will also develop their own initiatives and take every opportunity within the organization which may result in environmental improvements. This may be realized by introducing a system of environmental care within the organization. In addition to stimulation policies the government is also following a target group policy where agreements are made per industrial branch about the environmental efforts which have to be undertaken by the branch in question in the long run. These agreements are made on the basis of equality for as much as possible, where the industrial branch in question can indicate for itself which efforts it considers feasible in the long run. Basically, target group policy indicates which results should minimally be achieved through self-regulation.

In paragraph 3.1 we discuss the contents of stimulation policy. This policy was set up in the late eighties. Meanwhile it has resulted in a great many initiatives, not only with industrial production firms and business service organizations (such as trading companies and banks), but also with institutions in the areas of health care, government institutions (such as municipal firms), social service institutions (such as neighbourhood centers) and other non-profit organizations. In paragraph 3.2 we will discuss the contents of target group policy. Each year covenants are drawn up with the help of a few selected branches of industry, which have to be worked out in detail within the industrial branch in question. Thus at the moment we have covenants for e.g. the wood preservation industry, the basic metals industry, the printing industry and the chemical industry.

#### 3.1 *Stimulation policies with regard to environmental care within firms*

The government feels that the best way to implement self-regulation within organizations is by setting a system of environmental care within the firms themselves. This involves the incorporation of environmental care in the organization by means of tasks and procedures. The aim of the government here is to force the organizations to be alert to the possibility of environmental pollution, and to force them to try to limit or prevent such pollution. Eventually this can make environmental care, just like e.g. quality control and the care for good working conditions, a permanent point of attention within an organization. Although environmental care within firms refers primarily to industrial production firms, because they cause the most extensive environmental pollution, it is the government's express intention to stimulate environmental care also in other types of organizations which are relatively far less polluting.

The position of the government with regard to the way in which environmental self-regulation would have to be designed was formulated in the Memorandum 'Environmental Care within Firms' (Ministry of the Environment, 1989). With this memorandum the government officially announced what it wishes to achieve in the field of environmental care systems within firms and which activities it considers necessary for this purpose. An environmental care system is defined by the government as 'the coherent whole of policy measures, both organizational and administrative, aimed at gaining insight into, controlling,

and wherever possible, reducing the effects of business operations on the environment'. In this context it is important to recognize the difference between environmental care and an environmental care system. Each effort undertaken internally by an organization to improve the environment can be seen as environmental care. An environmental care system, on the other hand, refers to the tasks and procedures required within the organization to see to it that the organization is involved in environmental care. Thus an environmental care system in fact controls environmental care within the organization.

It was the aim of the government that by 1995 all firms within the Netherlands that caused medium to extensive pollution or specific environmental risks (some 10,000 to 12,000 firms) would possess a well-functioning system of environmental care, adapted to the nature, size and complexity of each firm. For firms that were less environmentally polluting (an estimated number of 250,000) the target was less ambitious. Here by 1995 clear steps would have to be taken towards the introduction of a system of environmental care in all branches where these firms are present. With its policy the government wanted to cover practically all production firms and service organizations within the Netherlands. To this end a 'Program Bureau for Environmental Care within Firms' was set up within the Ministry of the Environment, which was charged with the implementation and coordination of an 'activities program'. This program offered financial support to stimulation- and teaching projects and to activities having to do with enlightenment, training and education. In fact branch organizations, company environmental services and other business organizations were stimulated by this program to set up activities which could support the introduction of environmental care in the individual firms. This eventually resulted in the emergence of an extensive network of organizations that could be enlisted by firms for services concerning 'in-house' environmental care.

With its stimulation policy the government has assumed for the time being that firms and other organizations will voluntarily adopt a system of environmental care. To still keep in touch with current developments, in 1992 a preliminary report was drawn up, commissioned by the Ministry of the Environment, to determine whether enough progress had been made in business and industry. This report showed that of the 250,000 group some 90 percent of the relevant branches is involved in the development and introduction of a branch system of environmental care. Thus the target that the branches within this group need to have taken clear steps towards the introduction of a branch system of environmental care had already been largely met in 1992. As far as the 10,000 group is concerned the target is more ambitious: in 1995 all these firms have to possess their own fully functional system of environmental care. The intermediate balance of 1992 showed that this target is still far from being met. On the basis of this preliminary report it was expected that in 1995 from 40 to 65 percent of these firms would have made significant progress towards the introduction of an environmental care system. In spite of this prospect the government did not decide to make environmental care obligatory on the basis of this preliminary report. The approach remains a voluntary one. It was decided, though, to increase pressure on the 10,000 group to speed up the introduction of a system of environmental care. Five different instruments are applied for this purpose:

- 1 *Licensing* is intended to stimulate the introduction of environmental care, specifically by proposing a linkage between the environmental care system and the environmental license, making current licensing regulations simpler and more flexible.

- 2 *Target group policies* for industry are intended to stimulate the introduction of environmental care systems.
- 3 *Normalization and certification* are intended to offer firms clear support and recognition for the introduction of an environmental care system.
- 4 Firms are to be obliged by law to submit an *environmental report*.
- 5 *Extension of the enforcement instrumentarium* is being considered; this would make it possible to force firms that seriously violate their environmental licenses to commission an investigation at their own expense.

The use of these five instruments is coordinated with the progress that firms have made so far. Thus normalization and certification are specifically intended to give extra support in the right direction to the 'forerunners'. Instruments such as target group policies and licensing will be applied mainly to convince the 'middle group'. And the 'laggards' will have to be coerced mainly by means of stricter enforcement procedures and, where necessary, an in-depth investigation will be imposed (Ministry of the Environment, 1993).

### 3.2 *Target group policies for industry*

The stimulation policy for 'in-house' environmental care within firms supports firms in setting up their own systems of environmental care. Its intention is to enable firms to design their own responsibilities on a voluntary basis. However, voluntariness does not imply lack of obligation. Therefore the government is following a so-called 'target group policy', where agreements are made for each branch of industry regarding the environmental efforts that this branch should undertake in the long run. These agreements are made on the basis of equality for as much as possible, where the industrial branch itself can indicate which efforts it feels are feasible in the long run. Target group policy basically indicates which results should at least be achieved through self-regulation. Another function of target group policy is to make environmental policies more coherent. Because environmental legislation was introduced on a sectoral basis there have always been many adjustment problems, also because different institutions of the local authorities are charged with the implementation of environmental legislation (i.e., licensing). Thus, measures to prevent emissions into the air which are taken on the basis of one law may result precisely in more emissions into the water, which should be prevented on the basis of another law. Thus firms are faced with conflicting requirements. These contradictions could be solved by arriving at an integral approach at the branch level or at the level of the individual firms. Target group policy is seen as the perfect method to accomplish this adjustment (integration). Basically this means that per industrial branch a covenant is concluded which sets out integral objectives with regard to the environmental problem for each industrial branch. These covenants also involve representatives of the licensing institutions (such as the Association of Dutch Municipalities, the Inter-Provincial Council and the Union of Water Boards). Licensors at the local level are bound by these agreements.

Although it seems to involve only one target group, industry in fact consists of a conglomerate of industrial branches. Examples are the food- and stimulants industry, the textiles industry, the paper industry, the printing industry, the chemical industry, and the basic metals industry. Target group policy approaches these branches individually. The various branches differ considerably in terms of the type of environmental problems they face and the possibilities they have for doing



something about them. A branch-wise approach will enable a better adjustment of the control of these environmental problems. However, the way in which industrial branches are approached is identical, the only difference being that homogeneous and heterogeneous branches of industry are distinguished.

A *homogeneous branch of industry* consists of firms with very similar products and industrial processes. The production process of a homogeneous branch of industry is relatively simple. An example of a homogeneous branch of industry is the printing industry. This homogeneity enables a standardized approach to environmental problems, As far as environmental licensing is concerned, these branches usually depend on the municipalities and water boards as the competent authorities. Examples of homogeneous branches are considered to be the graphic industry, the brick industry, the concrete industry, the wood preservation industry, the leather industry, and the mineral products industry.

A *heterogeneous branch of industry* consists of large and complex firms with very dissimilar environmental problems which require equally dissimilar solutions. An example of a heterogeneous branch of industry is the chemical industry. In a heterogeneous branch of industry a standardized approach is not possible. For these branches of industry the competent authorities are usually the provinces and the Department of Ways and Communications (the Ministry of Traffic and Waterways) (Ministry of the Environment, 1992-1). Examples of heterogeneous branches are considered to be the basic metal industry, the chemical industry, the dairy foods industry, the textile industry, the meat industry, the paper industry, and the rubber/plastics industry.

The branch-wise approach of target group policy distinguishes six steps, which are applied differently on some points to homogeneous and to heterogeneous branches of industry.

*Figure 1 The six-step approach of target group policy*  
*Source: Brochure 'Environment & Industry Nr. 1 (1992, p. 11)*

The first step consists of *the formulation of emission reduction targets*. This means that for each branch of industry long-term and medium-term environmental targets are formulated (the year 2000 and 2010). These targets are deduced from those of theme-oriented policies.

The second step involves *the selection of the branches of industry*. Not all groups of firms are included. Selection criteria are the extent of environmental pollution they cause, the number of firms within the industrial branch (the more firms, the more effective will a target group approach be), the financial scope of firms to be able to take measures, and their competitiveness. The firms selected by the Ministry of the Environment, some 12,000 in all, together cause more than 90 percent of all industrial pollution. The non-selected firms have not been relieved of their responsibility to make an environmental effort. For these firms the reduction targets are not set out in detail in a Declaration of Intention for the branch in question (see step 3), but stipulated by means of licensing.

The third step involves *drawing up a Declaration of Intention (covenant)* for the selected branches. This takes place in cooperation between the individual branch organizations and the authorities involved (with the Inter-Provincial Council, the Association of Dutch Municipalities, the Union of Water Boards and the Central Government as their main representatives). This Declaration stipulates a so-called Integral Environmental Target (IMT) for the branch in question. The agreements laid down in this Declaration are binding and apply to all the firms in-

volved. The target group itself can indicate (see step 5) by means of which measures and in what order it wants to fulfill this target.

The fourth step is *to conduct a publicity campaign*. The individual firms in an industrial branch are informed of the environmental tasks that were agreed in the Declaration of Intention for the branch as a whole. The campaign is focused particularly on making a firm aware of its own responsibility.

The fifth step is *drawing up an implementation plan* for the branch of industry (in the case of homogeneous branches of industry) or *drawing up an industrial environmental policy plan* per firm (in the case of heterogeneous branches of industry). Such a plan will indicate in detail which measures will be used to meet the intended integral environmental target. The plan can also set out agreements concerning licensing procedures. An implementation plan (homogeneous branches of industry) is drawn up for the industrial branch as a whole through negotiations between the authorities involved (at the central level) and the branch organization(s). A business environmental plan (for the heterogeneous branches of industry) is drawn up in detail at the level of the individual firm through consultation between the authorities involved (at the local level) and the firm in question.

The sixth step is *the elaboration and application of these measures*. Although more preliminary work can be done in homogeneous firms by the central branch organization than in heterogeneous branches, in both types of branches additional work will still have to be done by the individual firms themselves. Firms will have to make an analysis, whether or not on the basis of checklists issued to them, of the environmental pollution caused by their firm. On the basis of this analysis measures have to be developed within the firm. Even the standard measures for homogeneous branches require further elaboration for the specific situation of an individual firm. Next the results of measures need to be reported to the authorities involved (Ministry of the Environment, 1992-1).

How is target group policy related to the policies aimed at the stimulation of environmental care within firms? As far as the homogeneous branches are concerned, the government sees a clear role for the central branch organization in implementing in-house environmental care. The Declaration of Intention can be seen as the kickoff for the environmental policy statement to be drawn up for each firm individually. The implementation plan, which indicates which environmental aspects within this branch are important and which standard measures can be taken, provides a clear basis for the environmental analysis and the environmental program. Nevertheless, the branch implementation plan will have to be translated into concrete measures by each individual firm at its own initiative.

In the heterogeneous branches, the same applies where the function of the Declaration of Intention is concerned. This is confirmed for the branch as a whole and can give direction to the environmental policy statements made by the individual firms. In heterogeneous branches the differences within the branches themselves are too great, however, to allow for substantial preparations at the central level for environmental analysis and the environmental program. The external function of the environmental policy plan is to provide the authorities involved with an insight into the measures the firm wants to take to reduce environmental pollution within four years, with a 'window' to the following years. The internal function of the environmental policy plan is that it can direct the environmental program drawn up in the context of the environmental care system.

Eventually the agreements that were drawn up on the level of the industrial branch as a whole and that were translated into individual plans at the level of the firm, should serve as the basis for licensing and enforcement as it takes place in the context of current legislation. Thus these agreements reduce the policy-making freedom of the licensing institutions. Without such an approach, after all, uniformity of these policies would be out of the question. Although we do see an in-depth binding of the competent authorities, this does not mean that the procedural rules with regard to matters such as participation and objection are put to one side. These possibilities remain intact. By means of licensing the agreements that were laid down in the covenants on the basis of target group negotiations are given a legally binding form (of the covenants it is not clear at the moment whether they are also legally binding). At the decentralized level target group policy can thus be legally formalized.

### *3.3 Results of the target group policy for industries*

In the initial plans for a target group policy for industries in 1990 thirteen branches were selected for a policy approach by covenants. However very soon the planning schedule appeared to be quite unrealistic: although covenant agreements were expected for all the selected branches in 1992, in the beginning of 1993 they only had been realized in the case of three branches. In 1993 a new planning schedule was adopted, but even with that schedule only for one branch the covenant agreement was in time. In all cases with a delay in the agreement on a covenant, the delay was caused by very different problems in the negotiation process: the uncertainty about the judicial status quo of the covenant (basic metal industry), the economical and technical feasibility of emission reduction goals (chemical industry), the emission profile in the reference year (metal-electro industry), the development of a detailed handbook (textile industry), and the increasment of the NO<sub>x</sub> emission due to the application of combined heat power (paper industry). The paper industry example learned the policy makers that an approach per branch might generate new problems from an integral chain management point of view. The result in 1996 is that the seven realized covenants cover the greater part of the industrial pollution in the Netherlands. With respect to five selected branches (leather, mineral products, brick, concrete, and wood preservation industry) it has been decided that a covenant will hardly have a surplus value. In the case of two branches negotiations are still going on in order to reach agreement on a covenant (Van den Berg, 1996).

Figure 2 *The planning and realization of covenants with industrial branches*

<b>Realized Covenants</b>	<b>Planning 1990</b>	<b>Planning 1993</b>
basic metal industry (1992 / heterogeneous)	1991	
graphic industry (1993 / homogeneous)	1990	
chemical industry (1993 / heterogeneous)	1991	
dairy food industry (1994 / heterogeneous)	1992	1994
metal-electro industry (1995 / homo-heterogeneous)	1992	1994
textile industry (1996 / heterogeneous)	1992	1994
paper industry (1996 / homogeneous)	1992	1994
<b>Planned Covenants 1996</b>	<b>Planning 1990</b>	<b>Planning 1993</b>
rubber/plastics industry (1996 / heterogeneous)	1992	1995
meat industry (1997 / heterogeneous)	1992	1994
<b>Cancelled Covenants 1996</b>		
brick industry (homogeneous)	1992	1995
concrete industry (homogeneous)	1992	1995
wood preservation industry (homogeneous)	-	1995
leather industry (homogeneous)	1992	1995
mineral products industry (homogeneous)	1992	1995

In the case of heterogeneous branches, the affiliated firms have to implement the agreed covenants into firm specific implementation plans. In practice the contents of these firm specific plans stay behind compared to what has been agreed upon in the branch covenant: a lot of unclearness is existing with respect to the interpretation of concepts like 'state of the technology', 'best technical means', 'best practicable means'; the financial argumentation in the case of bottle-necks is weak; very often the firm management doesn't formulate a management statement on the environmental strategy of the firm. The permitting authorities mostly only judge on headlines of a firm specific plan since they won't stake the good relations built up during the negotiations with a firm concerning its implementation plan. Firms consider their obligation to report yearly on the progress of the implementation plan as a heavy burden, and for that reason they badly comply with this obligation. They are permanently searching for the most optimal reporting system. In case of firms which don't work hard enough on the implementation of a covenant, permitting authorities are allowed to put pressure on them by stiffening the permit requirements. In practice however authorities hardly use their power to stick the stragglers. Although in the last four covenants (dairy foods, metal-electro, paper, textile industry) the government committed itself to user this power in order to prevent unequal competition within a branch (Van den Berg, 1996)

For each branch a consultation group with representatives out of the branch and the public authorities involved coordinates the implementation of the target group policy. One of their tasks is to report yearly on the progress for the branch as a whole and to evaluate this in the light of the targets that are agreed upon in the covenant. However the targets in the covenant may be appositioned when economical developments within the branch are going bad, when the environmental efforts might harm the international competition of the branch too much, or when technical means are not available to generate the efforts needed. A covenant may be prematurely terminated in case of unwanted social consequences or in case of unforeseen circumstances. Besides that, each covenant needs to be evaluated after four years. Until now only in the case of the chemical industry covenant a formal evaluation has been conducted. The conclusions came out to be less critical than expected and for that reasons the

consultation group for this branch didn't want to oppose parts of the covenant. For the time being public authorities as well as industrial authorities do agree on continuing the target group policy for industries on the basis of a consensus approach, partly because of the propitious evaluation of the chemical industry covenant and because of the avoidance of hard measures against straggling firms (Van den Berg, 1996)

## 4 A characterization of the target group policy for industries

Target group oriented policy can be considered as a special form of policy, with specific characteristics and related advantages and disadvantages. The specific characteristics of the target group policy for industries can be described in two ways. At first a policy can be defined as a structure of goals, means (policy instruments) and time preferences (Hoogerwerf, 1989). A target group policy can be analysed by looking at the goals that policy makers want to achieve, the policy instruments that are used for this, and the time preferences that are made in this respect. Although a target group policy is more than that: it is also a specific way of *policy making*. This will become obvious if we look at the way in which the distinctive policy processes (formulating, legitimating, implementing) take place. So characteristics of the target group policy also can be found by looking at the organisation and the processing of policy processes. We will look at it in both ways.

### 4.1 *Specific characteristics of the policy contents*

To start with specific characteristics of a policy we may look at the policy *goals*. Of course a policy is made in order to reduce the environmental burden of a target group and to contribute to the abatement of environmental problems. However these goals, which also can be considered as environmental standards, are not specific for a target group policy. In general they are written down in policy documents and by that they function as boundary conditions for a target group policy as well as for other forms of policy like 'area oriented policies'.

Besides that, a target group policy is also focusing on process oriented goals which are serving to achieve the environmental standards better or earlier. These process oriented goals have the character of intermediate goals which are contributing to the achievement of the final goals which are more environment related. Some of these more specific goals have been mentioned already in the overview of the development of the target group policy.

At first, from the beginning the target group policy was focusing on the *integration of environmental measures at the level of a target group*. This search for integration can be seen on the level of a target group or branch as a whole as well as on the level of an individual firm.

Secondly, the target group policy is trying to *initiate interiorization and self-initiative* among (members of) target groups. This goal is obviously related to the previous one, while a real integration of environmental measures taken by a firm can only take place if this firm considers itself in an early stage the environmental consequences of its decisions.

Another goal which is related to this concerns the creation of sufficient *support* for environmental policy. Interiorization and self-initiative will only work if target groups are convinced of the necessity of a progressive environmental policy and if they forget to see public environmental policy as an external threat, but instead of that do consider it as an incentive which creates opportunities for the improvement of the firm's performances.

All the goals mentioned above can definitely be typified as matters that in the perspectives of all the actors involved are 'worthy' and 'positive'. Integration, interiorization, support, no human being with sense could be against it. Of

course this 'positive' image has its consequences for the choice of *policy instruments* which are used to achieve all these beautiful things. In general these instruments have a stimulating character (Kuijpers and Glasbergen, 1987).

In order to create sufficient support target group policy gives an important role to *communicative policy instruments*. The creation of mutual understanding requires a lot of explanation of opinions and motives and it even requires a willingness to listen to opinions and arguments of others. Initiating *mutual consultation* is an essential part of this policy. Consultation is also of great importance for the integration goal. The finetuning of measurements requires a considerable knowledge of the management policy as well as the circumstances within firms. Since this information is not available among all the actors involved, the mutual providing with information is necessary. In this consultation context not only the fact is important that actors are on speaking terms with each others, but above all the way in which they are speaking with each other. In other words, what are they doing with mutual consultation as an instrument. Another important communicative instrument is the provision of information towards the individual firms and implementing public authorities that are not involved themselves in the consultations on the level of the target group. Since the policy implementation is a matter for the individual level it is quite important for the policy success that consultation results and other aspects of the policy contents are communicated precisely. This communication especially concerns the core of the target group policy: making firms feeling responsibility and stimulating their self-initiative.

The function of consultations as part of a target group policy is not only 'informing' and 'motivating'. The consultations are also aiming on making agreements that take effect with respect to the contents of the policy and the way in which this is going to be implemented. It is not surprising that *covenants* are a commonly used instrument for this purpose. A covenant can be defined as a written agreement between different parties involved. The fixation of written agreements has a meaning for the obviousness of the consultation results and the policy contents. This obviousness has a component that concerns the matters upon which has been agreed and a normative component that concerns what the parties involved may expect from each other in the future. In other words, although covenants are gentlemen's agreements, it is intended that they are not without engagement: the parties involved are making commitments to each other that are intended to take effect. Firms are making commitments on a range of activities through which they will contribute to the implementation of the policy. The public authorities involved are making commitments on a range of policy measurements in a certain time order to provide the firms with more judicial certainty for the future.

A third instrument with a clear stimulating character is *facilitating with personnel and financial support*. These are so-called facilitating instruments. The target group policy for industries starts at the level of the ministry with a special task force of staff people who take responsibility within the department for the so-called 'target group management'. Besides that mostly a facilitating office is supporting the consultations at the target group level to take care of implementation work and administrative tasks. Personnel support may be in the form of paying for an independent consultation leader or process consultant. Such a 'facilitator' might be a guarantee that the consultations will have a result and that all parties involved are going to adopt that result. Financial support may also concern financing research, pilot projects or information campaigns.

In the context of target group policies hardly no *legislation* is used for achieving the policy goals. Although covenants include norms and behavioral rules, the judicial engagement of this normative component is not complete clear. Therefore it is considered to be necessary to use existing legislative (permitting) competences to formalize the covenant agreements. So target group policy is not replacing legislation but is additional to it. Covenant agreements are more about the way in which authorities will act in the permitting process.

#### 4.2 *Specific characteristics of the policy process*

An important characteristic of the policy process is the *openness during the consultations with respect to the contents of the policy*. Meaningful consultations are only possible if a policy is not fixated on all details. So it is possible to talk about, to discuss and to negotiate on problem perceptions, legitimated interests, uncertainties and possible solutions. This openness with respect to the policy contents (discretion or scope for policy making) has to be distinguished from openness in a sense that the process is accessible to everyone who wants to participate. For example environmental action groups and other interested parties cannot participate in the consultations. The openness is not only effectuated in the way in which consultations are organized, but also in the possibility to fix in agreements that some issues do need further investigations or further consensus building. The policy is considered to be a continuous learning process or a 'policy in motion' (VROM, 1992-2, p.13). Thirdly, the openness with respect to the policy contents is effectuated in the nature of the agreements and their timing. Often agreements are made on emission reduction goals for a longer period. By that goal prescriptions are being used more than prescriptions with respect to means. Firms do get more freedom in choosing and timing measures through which they think they can achieve the policy goals. In that way it is going to be easier for firms to apply processintegrated measures, which are preferred from an environmental control point of view as well as from a firm management point of view instead of clean up technologies.

For that matter it has to be remarked that openness doesn't mean that anything can be a matter of discussion. The overall environmental standards as formulated in official policy documents are seen as boundary conditions for the discussion. Also during the consultation process the discretion is decreasing since the participants in a latter stage of the process can be held responsible for the agreements in an earlier stage.

Secondly, characteristic for target group policies is a *multi-staged policy process* (De Bruijn and Lulofs, 1991). This means that delegation and representation are crucial elements in the policy making process, because without representation too many actors would be involved in the consultation process. However through this method of working binding agreements between various parties are being created. The covenant agreements are meant to be binding not only upon the subscribers, but also upon their rank and file. In the case of the affiliated firms as well as in the case of the affiliated public authorities at the decentral level it is not as a matter of course that they will follow the centrally made agreements without having any influence. Quite remarkable in this method of working is that branch and other representatives not only function as a speaker for the interests of their rank and file, but also are in charge of the implementation of the national environmental policy through implementing the



covenant on which they agreed (Doorewaard, 1990, p.45). Therefore the cooperation of these organisations is an essential chain in the policy process.

The multi-staged policy making is also meant to achieve at the level of target groups or branches a more *uniform policy*. At the level of target groups (branches) agreements are made that will be directive towards the permitting to individual firms. By this it is expected that unequal competition within a branch through differences in permit prescriptions can be prevented. This uniformization or standardization of the permitting already has been preceded by the CUWVO-guidances for surface water emissions and the Dutch Emission Guidances (NER) for air emissions. It is obvious that this standardization requires a certain homogeneity on the side of the target group: standardized solutions can only be developed for comparable cases.

Another important characteristic of the target group policy making is that to some extent *already existing policy instruments are being used*. This is evident in the way in which this policy is dealing with the *permitting and enforcement* of existing legislation. As has been written above the agreements on the target group level need to be directive to the issuing and enforcement of permits which are based on existing legislation. Therefore the discretion of the permitting and enforcing authorities is being diminished by the agreements. Without such a method of working there would be no uniformization of the policy. Although there is a binding of the authorities to the contents of the covenant, this leaves procedural rules concerning citizen participation as they are. With the help of the permitting authorities the covenant agreements do get a judicial fixation, although in advance it is uncertain if the covenant agreements can have a binding effect. In that sense permits do get again a codifying character by fixating agreements or consensus that have been reached by other means in the societal reality.

An aspect of permitting which is related to the integrative character of target group policies is that also at the individual firm level an *integration of the different issued permits* is needed. This means that the permitting authorities (provinces, municipalities, water boards) have to finetune their activities. So even at the local level a somewhat permanent consultation structure should be found.

## 5 Relatively inaccessible target populations

### 5.1 *Instrument characteristics in policies on inaccessible target populations*

While the Dutch government developed extensive target group policies with regard to accessible target groups over the years, for target groups which are difficult to access this policy has hardly taken off yet. An example is the target group consumers. In the second National Environmental Policy Plan (NMP-2) (Ministry of the Environment, 1993) consumers are characterized as a target group which is difficult to access. *“They are often faced with a lack of insight into the environmental pollution caused by their own activities, which makes them more difficult to address. Agreements are impossible or next to impossible to make. Individually focused instruments such as licensing are more difficult to apply for a number of these groups.”*

To pursue a target group policy, the characteristics of the target group are of major importance. Particularly the *accessibility* of the target group plays a major role. The target group characteristic ‘accessibility’ is defined by us in terms of its capability of being addressed: to what extent can we negotiate with the target group? We can determine the accessibility of a target group on the basis of various aspects.

An obvious factor which determines the accessibility of a target group is its *size*. The size of a target group is determined by the number of members of the target group. The difficulty involved in addressing the target group decreases in equal proportion to the number of its members. The more members a target group has, the more its accessibility as a group is reduced, because the individual approach to these members often reaches the limits of what is practically possible. An example is the target group of the Dutch car drivers. Holland has some 9 million people with a driving license and 5.6 million cars. In view of its size, therefore, the target group ‘car drivers’ can hardly be addressed. The smaller the target group, the greater the chance that its members can be addressed individually. This makes it easier for a policy maker to get in touch with the individual members of the target group of energy-producing firms.

A factor which is related to this is the *degree of organization* of the target group. The accessibility of a target group is also determined by its degree of organization, in the sense that this influences the possibilities a policy-maker has for entering into discussion with the target group and arriving at possible agreements. In cases where the target group is hardly organized at all, it can hardly be a participant in decision-making. Here we return once again to our example. Car drivers are represented, among others, by an organization of road users (General Dutch Union of Road Users - ‘ANWB’). However, this organization itself has indicated that it does not wish to be seen as a lobby of the car drivers. Furthermore, car drivers as consumers are represented by the Consumer’s Union (‘Consumentenbond’). On the other hand, a target group with a high degree of organization is capable of being addressed as a party in the policy-making process; as such it will occupy a more powerful position than less well organized target groups with respect to other actors in the policy-making network. As the degree of organization of the target group increases, more possibilities are created to participate as an actor in the policy-making network. Examples of them were seen in previous paragraphs. A certain degree of organization is thus a condition for a target group for participation in policy-making, and as such also a condition for directly influencing the choice of instrument. The degree of organization of a target group is important both from the point of view of the target

group and from that of the policy-maker. On the one hand we have seen that the degree of organization partly determines the possibilities of a target group to influence policy-making. A target group characterized by a high degree of organization is able to make itself heard and possibly to steer the outcome in the desired direction. On the other hand we should realize that the degree of organization of the target group can influence the legitimacy of the decision-maker. A target group characterized by a high degree of organization can lend a certain legitimacy to government actions due to its participation in policy-making.

The above factors should not be seen as isolated variables in determining the accessibility of a target group. The degree of organization of the target group and the number of its members are related and can determine its accessibility both individually and in combination with each other. Thus a relatively large target group with a very high level of organization may well be just as accessible as a very small target group whose members can be addressed individually.

One target group characteristic that we should bear in mind in view of the accessibility factor is the *electoral importance* attached to the target group. Electoral importance is partly related to the size of the target group. Since the inaccessible nature of a target group may be partly due to its large size, the electoral importance of such a group is also a major factor in many cases. If we look at our example again, we see that a (relatively inaccessible) target group such as car drivers is of great electoral importance to the policy-making government. Here we should note, however, that in addition to the exceptionally large size of the target group, the direct relation between the members of the target group 'car drivers' and the authorities also plays a part in the electoral system. In view of the great electoral importance of this target group, it may be important for the policy-making authorities to be aware of the opinions of such a target group and possibly to take its views into account in policy-making. In the case of the target group car drivers its great electoral importance is reflected, for instance, in the frequent studies on the social support for an increase of petrol duties.

Finally, the accessibility concept needs to be nuanced somewhat. Also target groups that are difficult to access may be capable of being addressed to a certain extent. Often relatively inaccessible target groups are represented in decision-making process in one way or another, as we have seen in the case of the target group 'car drivers', who are represented by the organization of road users, the 'ANWB'. The question is to what extent they are actually represented, in the sense that the representative body is a reflection of (the interests of ) those being represented. This means that a representing actor represents the entire target group and is not just *aware* of its interests, but is also able to reconcile these interests so that the group may present itself as a single organization. In the case of the road users' organization, the 'ANWB', this did not work out. Although the ANWB is probably well aware of the interests of car drivers, it has become obvious over the years that it is unable to reconcile these interests. Sabatier and McLaughlin (1990) mention the equality and similarity of the opinions of the leaders and those of the ordinary members of target groups. They conclude that the opinions of leaders and ordinary members are very likely to coincide, or alternatively, that the opinions of the leaders will be more extreme than those of the ordinary members,

In addition to the reconciliation of the objectives of the target group and those of the representative body/bodies, another important question is to what extent the representatives are able to mobilize the target group to make changes. Here we are basically talking about the mobilization of the resources of the target group. Confidence of the target group in and consensus with the representative

bodies is a requirement to make the target group change its behaviour at the insistence of its representatives. Thus the question is to what extent the target group recognizes the authority of its representatives. If the target group recognizes the authority of its representatives, it will be more prepared to undertake action at the insistence of its representatives. If the representatives lack authority over the target group, it is less likely that they will be able to mobilize the resources of the target group. In addition to voicing the views of the target group the representative body may also be capable of mobilizing criticism, but the question remains whether this body is actually able to stimulate the target group to change its behaviour. This situation exists with regard to the road users' organization the ANWB. From this point of view the 'official' representative body plays a different part, therefore, than the 'unofficial' representative body. The 'official' body seems to be able to make more promises than the 'unofficial' one. The remaining actors in a process can interpret promises made by an 'official' organization during negotiations differently than those made by 'unofficial' representative bodies. Thus, if an 'official' body promises to mobilize its grassroots support, this will be valued more highly than if such a promise is made by an 'unofficial' organization.

The reason why we distinguished between accessible and inaccessible target groups lies in the fact that the accessibility of the target group may have a direct influence on the choice of instrument. To give some examples, following Bressers (1993) we first distinguish the following instrument characteristics:

1. A normative appeal to the obedience of the target group;
2. The extent to which the response of the government corresponds to the behaviour of the target group;
3. The supplying or withdrawing of resources;
4. The freedom of choice of the target group in stating whether the instrument is applicable to its own behaviour;
5. One-sidedness or more-sidedness;
6. The role of the policy-maker in policy implementation.

In practice a policy-maker in the case of a relatively inaccessible target group is more likely to choose a one-sided rather than a more-sided instrument, simply because a more-sided instrument requires some form of negotiation. An instrument that makes a normative appeal to the obedience of the target group is an easy means to implement in the case of an inaccessible target group, because there is no need to define the target group. Nevertheless, this will be no more than a consideration in the choice of instrument at a moment when other options prove difficult to realize. In fact, one of the disadvantages of a normative appeal to the obedience of a relatively inaccessible target group is that the instrument requires enforcement and the target group is difficult to access by definition. Enforcement is problematic when we are faced with a relatively inaccessible target group. Also an instrument that offers freedom of choice to the target group when it is applied, is an easily applicable if the target group is difficult to access. If the policy-maker offers this freedom to the target group, he himself does not have to define the target group; while if the target group is not given this freedom, in most cases first an inventory will have to be drawn up of the target group.

If we now look at the instrument characteristic 'supplying or denying resources to the target group', we find that this characteristic is closely related to the instrument characteristic 'freedom of choice of the target group in the application of the instrument'. Offering freedom in the application of the instrument is only feasible, generally speaking, if resources are made available to the target

group. A situation where the target group itself can and may decide whether it certain resources will be withdrawn, is hardly realistic. However, contrary to expectations this situation does occur in the Netherlands with regard to the choice of consumers in favour of 'green electricity'. In this case consumers choose voluntarily to either contribute to a 'green' electricity supply in the form of a higher Kilowatt/hour price, or to apply the basic rate to their consumption, so that they do not contribute to the generation of sustainable energy. We should place this in a wider perspective, however: consumers who choose the higher 'green electricity rate' are eligible for a lower energy charge on their consumption in the long run. Nevertheless, even though the example of 'green power' is the only one that can be imagined, it is still an example in practice of the previously outlined unrealistic situation. Here we assume that granting freedom of choice to the target group if the instrument is applied is balanced by the supplying of resources and, vice versa, that the withdrawal of resources automatically implies that the target group does not have any freedom of choice. Below we shall use an instrument with these characteristics as an example: an increase in the charge on petrol.

The chance that the policy-maker will choose an instrument where he himself plays a major part in policy implementation is lower in the case of a relatively inaccessible target group than in cases where the target group is easily accessible. The policy-maker feels that the target group is difficult to access, but this does not mean that the target group may not be easier to access for others. In such a situation the policy-maker can choose to leave policy implementation to e.g. an intermediary organization closer to the target group.

Summarizing, we see that in practice instruments that are focused on a relatively inaccessible target group generally correspond in terms of three characteristics. Generally, these instruments *do not make a normative appeal to the obedience of the target group*. Furthermore, the instruments that are focused on a relatively inaccessible target group are generally characterized by their *one-sidedness*. In such a case more-sidedness can only occur with respect to other actors than the target group. In the case of an inaccessible target group a more-sided instrument is hardly feasible in view of the elusive nature of the target group. Finally, instruments that are focused on a relatively inaccessible target group are generally characterized by the fact that *policy implementation is left to other actors* than the policy-makers themselves. This is quite obvious if we realize that the target group is difficult to access for the policy-makers, while this may not be the case for other actors. In such a case the policy-maker is more likely to opt for implementation by an actor who has easier access to the target group.

Since the instruments that are focused on relatively inaccessible target groups roughly coincide in terms of these three instrument characteristics, these characteristics are therefore not interesting if we are looking for an explanation for the choice in favour of different instruments focused on this target group. These characteristics are related to the general situation with regard to inaccessible target groups and thus do not offer an explanation of the choice of instrument. Such an explanation may be deduced, though, from the other (generally different) instrument characteristics. These consist of 'the extent to which the government response corresponds to the behaviour of the target group', 'the supplying to or withdrawing of resources from the target group' and 'the freedom of choice of the target group in stating whether the instrument is applicable to its own behaviour'.

## 5.2 Network characteristics in relatively inaccessible target groups

The characteristics of the chosen policy instruments are largely determined by the characteristics of the policy network where this choice of instruments made. To get a full picture of the processes that take place within a network, we have to look at the network as a whole. Here the individual actors play a part, but always in relation with each other. The characteristics of actors are only interesting, therefore, if placed in a wider perspective, that of the network. Only in comparison with the characteristics of other actors can the characteristics of certain actors stand out, and as such play an important role in the processes within the network. Thus, the level of analysis here is that of policy networks rather than that of the individual actors.

The characteristics of networks can have a direct influence on the characteristics of the policy instrument that is chosen during the decision-making process. Various characteristics of networks may be distinguished that influence the choice of specific policy instruments. Here we distinguish the network characteristics 'distribution of resources', 'solidarity' and 'intensity of interactions'.

Resources can be seen in the light of power relationships. Here resources are a relative concept. After all, they are considered in the light of the relations with the resources of other actors. In the *distribution of resources* over the actors in the network it is not important *which* actors possess *which* resources, but rather *how* the use of these resources is distributed over the actors within the network. An equal distribution may occur to a greater or to a lesser extent. The possession of resources constitutes a basis for the power of an actor within the network. An unequal distribution of resources over actors is accompanied by unequal opportunities to exercise power within the network. Actors who possess relatively many resources, or a relatively large quantity of a given resource, are in a position to exercise power over developments within the network. If resources are evenly distributed over the actors, a situation of mutual dependence, an equal power base, is created: in such a situation actors cannot determine developments within the network without support from one another. Here we distinguish various categories of resources: physical goods, people, information, time, money, rights and powers, external consensus and internal consensus.

In fact, the interchangeability of resources often has a major influence when a situation of interdependency is created. If resources are fully interchangeable (as is often the case with financial resources) an equal distribution of resources is often accompanied by interdependence of the actors. However, if resources are not interchangeable (as may occur in the case of rights and powers) an equal distribution of resources does not automatically have to mean that the actors are interdependent. Conversely, in cases where there is an uneven distribution of resources and where they are fully interchangeable, an actor who has relatively more resources available by definition holds a more independent position compared to the other actors. While in cases where there is an uneven distribution of resources and they are *not* fully interchangeable, the actor who possesses relatively more resources does not automatically hold a more independent position compared to the other actors. Here we consider the distribution of resources over the actors within the network as one of the most influential factors on the choice of policy instruments.

*Solidarity* between actors is defined by us here as the extent to which actors within a network sympathize with each other's goals and with the extent

to which they correspond in terms of their underlying motivation for corresponding goals. The motivation of actors can correspond to a greater or to a lesser extent. Here we differentiate the extent to which actors sympathize with each other's goals and the extent to which they agree in terms of their motivation to achieve these goals. Actors can agree in terms of their goals, while their motivation to pursue these goals may be different. In cases where the motivation for the common goal is the same, we assume a higher degree of solidarity between the actors involved than in cases where only their objectives correspond while their motivation to achieve them does not. This refers not only to in-depth objectives but also to process objectives. Thus the function of the network for the actors can be part of the motivation of the actors. For instance, the network may be based mainly on a problem-solving motivation or may fulfill the function for actors to involve other actors in the area of attention in question. In our opinion, solidarity is one of the most strongly determining factors in the choice of policy instruments within the network.

The *intensity of interactions* refers both to interactions that take place within a specific policy-making process and outside of such a process. Actors who interact within the framework of a certain policy-making process can also meet in other processes outside this process. This contact outside the process in question, however, certainly contributes to the intensity of the interactions between actors. Here we should not lose sight of the difference between the intensity of the interaction and solidarity. A high degree of intensity of interactions does not necessarily have to correspond to a high degree of solidarity. However, a high intensity of interactions, provided it takes place voluntarily, does indicate common interests (e.g. on the basis of interdependence). These interests do not have to be covered by the process in which the network is active and involved at that moment. Interaction can be seen as a means to achieve certain goals, or as the goal in itself. The intensity of interactions within the network can influence the characteristics of the chosen policy instrumentarium.

In a target group approach policy instruments are adjusted to specific target groups. Here the focus is on the relation between the authorities and the target group. The accessibility of the target group plays an important part here and has several consequences for the way in which network characteristics influence the choice of instrument. In the network characteristics presented by us in the above we assumed a network where the target group has an influence. After all, these characteristics were formulated bilaterally: a number of characteristics is deduced from the relation between target group and policy-maker. In the case of the inaccessible target group there can be no question of a relation between policy-maker and target. The network characteristic 'intensity of interactions' thus by definition loses its validity as an explanatory variable. In the situation of the inaccessible target group we look for an explanation of the choice of instrument among the unilaterally formulated network characteristics. The relation between policy-maker and target group (insofar as such a relation exists) is only relevant where it influences the attitude of the policy-maker towards the target group. This means that just as in the above, we feel that solidarity and the distribution of resources over the actors present within the network influence on the choice of instrument. One-sided (or unilateral) solidarity is defined by us as the extent to which the policy-maker feels that the objectives and motivation of the target groups correspond to his own objectives and motivation. For example: do the mobility objectives of the government correspond to the objectives of car drivers? The distribution of resources is seen by us in this case in terms of avail-

ability: does an actor feel that he possesses (more than) enough resources to achieve his objectives? In this case 'availability of resources' is not a relative concept, but a one-sided (unilateral) concept. For example: is it within the range of my possibilities as a policy-maker to combat traffic jams?

All in all, in the case of instrument choices we are faced with two extreme situations between which situations are located on a continuous scale. One extreme consists of the situation where a policy-maker within the policy network is faced with an accessible target group. Such a target group part participates (usually through representatives recognized by the target group) in the policy-making process. The other extreme consists of the situation where the policy-maker is faced with a target group which is difficult to access and which is not or hardly represented in the policy-making process and thus does not participate in this. For both extremes we make assumptions about the relation between the existence of the distinguished network characteristics and the characteristics of the chosen policy instrument within this network. Below we shall give an example of the way in which we can use these assumptions.

The extreme situation where a policy-maker in the policy-making network is faced with an accessible target group is characterized by participation of the target group in policy-making. In cases where the target group participates in policy-making through a representative body, we assume that this will be an 'official' institution recognized by the target group. In other words, that both the objectives of the target group are propagated by its representatives and that these representatives are capable of mobilizing the resources of the target group. In this situation the network characteristics 'solidarity', 'distribution of resources' and 'intensity of interactions' between the actors in the network determine the characteristics of the chosen instrument. In the case of the accessible target group we see a negotiation process between the policy-maker and (the representatives of) the target group. Thus the independent variables were formulated in terms of interaction: we are dealing here with objectives and resources in relation to other actors and interactions between the actors.

The extreme situation where the policy-maker is faced with a relatively inaccessible target group is characterized by the fact that this target group is not or hardly represented in the policy-making process and thus does not participate in it. In such a situation the attitude of the policy-maker towards the target group is decisive for the choice of instrument. The characteristics of the policy-maker which we will consider here are the (one-sided) solidarity of the policy-maker and the extent to which resources are available to him. The one-sided solidarity of the policy-maker is seen by us here in terms of the correspondence between the objectives of the policy-maker and the objectives of the target group (perceived by the policy-maker). The availability of resources is reflected in the perception of the policy-maker whether or not he possessed sufficient resources to realize his objectives. These characteristics of the policy-maker determine the characteristics of the chosen instrument.

The situations which are located on the continuum between the above-mentioned extremes, are characterized by a policy-maker who is faced with a relatively inaccessible target group which is represented in the policy-making process, and as such is participating in this process. These situations are distinguished from both extremes by the position of the representative body. In the extreme case of the accessible target group the representative shares the goals of the target group, but in addition is also capable of mobilizing the resources of the target group. In the intermediate situations there are representative bodies (which participate in the policy-making process) which are capable of mobilizing



the resources of the target group to a greater or lesser extent. Judging from the extent to which the representative is capable of this, the situation can be located between the extremes of the continuum.

*An example: increase of the charge on petrol*

An example of the application of the model to a relatively inaccessible target group is seen in the increase of the charge on petrol. In 1991 the Dutch charges on petrol were increased considerably. An explanation of the choice of precisely this instrument can be found in the characteristics of the network within which this instrument was realized. The petrol charge as a policy instrument is characterized by the withdrawal of resources from the target group, a lack of freedom of choice for the target group to state its acceptance of the applied instrument, and full equality. In the constructed explanatory model we assume *by order of importance* that if the policy-maker according to his own perception has insufficient resources available to realize his objectives and if, moreover, the resources withdrawn from the target group can be added to the supply of resources of the policy-maker, the chance will increase that the policy-maker will eventually withdraw resources from the target group. In addition we will assume that the less the objectives of the policy-maker correspond to his perception of the resources of the inaccessible target group, the smaller the chance will become that the policy-maker will offer the target group freedom of choice in the application of the instrument. Finally, regarding this case we will also assume that the more the objectives of the policy-maker correspond to his perception of the objectives of the inaccessible target group, and if the policy-maker feels that he has insufficient resources available to realize his objectives, the greater the chance will be that the policy-maker will respond proportionally to the behaviour of the target group. In view of the importance of the former assumptions we expect that on the balance, the choice in favour of an increase of the charge on petrol as a policy instrument can be explained from a lack of solidarity and insufficient availability of resources to the policy-maker.

In our example we see that the Dutch charge on petrol in 1991 was increased considerably in an attempt to reduce the deficit and cover expected expenses in traffic and transport policies. Here the policy-maker, the Ministries of Finance and of Traffic and Waterways, expected that his objectives in this area would not correspond to those of the target group of car drivers, since they would automatically be opposed to an increase of these charges. In other words: one-sided solidarity was assumed to be low. As regards the availability of resources the policy-maker in this case did not appear to possess sufficient financial means to realize his higher goals (reduction of government expenditure, covering expected expenses). The policy-maker did possess sufficient rights and powers, however, to realize the increase of the petrol charge. The other types of resources did not appear to play any role of importance in this case.

## 6 Towards an evaluation of the target group policy approach

For target groups which are difficult to access a specific public policy has hardly taken off yet. To pursue a target group policy, the characteristics of the target group are of major importance. An obvious factor which determines the accessibility of a target group is its *size*. The size of a target group is determined by the number of members of the target group. The difficulty involved in addressing the target group decreases in equal proportion to the number of its members. A factor which is related to this is the *degree of organization* of the target group. The accessibility of a target group is also determined by its degree of organization, in the sense that this influences the possibilities a policy-maker has for entering into discussion with the target group and arriving at possible agreements. In cases where the target group is hardly organized at all, it can hardly be a participant in decision-making. The degree of organization of the target group and the number of its members are related and can determine its accessibility both individually and in combination with each other. However, the accessibility concept needs to be nuanced somewhat. Also target groups that are difficult to access may be capable of being addressed to a certain extent. Often relatively inaccessible target groups are represented in decision-making process in one way or another. The question is to what extent they are actually represented, in the sense that the representative body is a reflection of (the interests of ) those being represented. In addition to the reconciliation of the objectives of the target group and those of the representative body/bodies, another important question is to what extent the representatives are able to mobilize the target group to make changes. The reason why we distinguished between accessible and inaccessible target groups lies in the fact that the accessibility of the target group may have a direct influence on the choice of instrument.

In practice we see that instruments that are focused on a relatively inaccessible target group generally correspond in terms of three characteristics. Generally, these instruments *do not make a normative appeal to the obedience of the target group*. Furthermore, the instruments that are focused on a relatively inaccessible target group are generally characterized by their *one-sidedness*. Finally, instruments that are focused on a relatively inaccessible target group are generally characterized by the fact that *policy implementation is left to other actors* than the policy-makers themselves.

The characteristics of the chosen policy instruments are largely determined by the characteristics of the policy network where this choice of instruments made. Various characteristics of networks may be distinguished that influence the choice of specific policy instruments. Here we distinguish the network characteristics 'distribution of resources', 'solidarity' and 'intensity of interactions'. In a target group approach policy instruments are adjusted to specific target groups. Here the focus is on the relation between the authorities and the target group. The accessibility of the target group plays an important part here and has several consequences for the way in which network characteristics influence the choice of instrument. In the network characteristics presented by us in the above we assumed a network where the target group has an influence. After all, these characteristics were formulated bilaterally: a number of characteristics is deduced from the relation between target group and policy-maker. In the case of the inaccessible target group there can be no question of a relation between policy-maker and target. The network characteristic 'intensity of interactions' thus by definition loses its validity as an explanatory variable. In the situation of the inaccessible target group we look for an explanation of the choice

of instrument among the unilaterally formulated network characteristics. The relation between policy-maker and target group (insofar as such a relation exists) is only relevant where it influences the attitude of the policy-maker towards the target group.

Looking at the better accessible target groups which have been discussed in this paper (the branches in industry) we first have to remark that it is still too early for conclusions on the effectiveness of the Dutch target group policy approach. This approach is still under construction and an active implementation practice still cannot be seen (which in itself of course is a signal). Nevertheless it is possible to come up with critical notes on the specific characteristics of the policy contents and the policy making process.

A first disadvantage of the target group policy approach is that the integration of environmental measures takes place in a limited integrative perspective: the perspective of the target group or the one of a firm. Integration problems however do not only appear at the level of firms, but also for example at the level of environmental themes, geographical areas and product chains. Each form of integration from a specific perspective implies that other integrative perspectives get insufficient attention. A target group policy for industries definitely will complicate an integrative approach that considers product chains. From an integral chain management point of view the involvement in one consultation meeting of very different target groups like energy utilities, various industrial branches, consumers and retail trade, and waste utilization firms would be needed to choose the most optimal environmental measures. In fact this problem is comparable to the sectoral integration problems which occurred are the start of this all.

A second important aspect of the target group policy approach is that the openness with respect to the policy contents not only has advantages. Openness is not only creating possibilities for meaningful consultations, it also might give way to the influence of actors who will take environmental interests not serious enough. The whole strategy of interiorization is based on the assumption that it should be possible to get firms at a point where they are willing to internalize the external effects of their decisions in the context of a market oriented economy. Although general agreements for a target group as a whole might minimize the internal competition, they won't have consequences in proportion to foreign competitors who are partial operating under the conditions of a classical capitalistic economy (Eastern Europe and Asia). It is very uncertain if the Dutch industry will accept with open arms the luxurious of interiorization on a voluntary base. Related to this is that the voluntariness of agreements has its natural boundaries in that a firm will never accept voluntary measures which in fact will end its production activities.

Also the multi-staged character of the policy making process not only has advantages. The consultation structure requires huge investments in terms of time and human power. In other words, a lot is invested in the policy formulation process, while the implementation process (where it comes to the environmental results) still is not in operation. Besides, the policy content risks unclearness since so many different agreements of different actors need to be incorporated. One who wants to know the policy content will not find some clear policy documents, but has to collect a large amount of different intention declarations, implementation programs and other documents of various target groups. Since the policy implementation is also hidden within the branch organizations, the implementation structure is difficult to overview. In between the

first signals that the environmental policy might turn into a chaos have reached the political arena (Volkskrant, 30 oktober 1993).

An important problem with respect to the role of intermediate organizations is their role towards their rank and file. Since the degree of organization of target groups and branches differs a lot, a large amount of firms might not be represented in the consultation process and therefore these firms are difficult to address for compliance with the covenant agreements made. Besides, in general the representing branch organizations hardly have the power to push unwilling members to compliance or to take disciplinary measures.

Further the target group policy approach has to deal with some internal contradictions. On the one hand it is considered to be important to create clearness and certainty for firms with respect to future policy developments. On the other hand this is difficult to unify with the idea of 'policy in motion'. A policy in motion implies that some issues will be pushed forward on the agenda, that there might be reasons to re-open the discussion on issues on which already agreements were reached, and that policy experiences might lead to a reformulation of the policy contents and a restructuring of the policy process.

Another example of a contradiction is the simultaneous striving for uniformity and integration at the firm level. Uniformity assumes general rules and agreements, while in most cases integration at the firm level only can be realized by taking individual circumstances into account. The striving for uniformity may also lead to a dictate of the pace and contents of the agreements by the most complicated cases within a branch. For these cases additional research and consultation efforts might be necessary, while firms with rather simple problems and solution opportunities could work harder on the implementation of environmental measures and get earlier results.

Despite the mentioned objections and possible problems, we shouldn't forget that the target group policy approach is a sincere attempt to learn from the limitations of environmental policies in the past. Problems concerning the policy support and policy integration are realistic and demand for a satisfying answer. That the ideal policy approach won't exist is something that will be understood by everyone who is involved in policy practice or policy research.

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