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### ESDN Quarterly Report March 2009

## Involvement of sub-national authorities in National Sustainable Development Strategy processes

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This ESDN Quarterly Report (QR) focuses on the involvement of sub-national authorities (i.e. regions and municipalities) in the various processes related to National Sustainable Development Strategies (NSDSs). After outlining some general aspects of strategic public management of NSDSs and vertical integration, this QR presents an overview of sub-national involvement in NSDS processes in the EU Member States. The four identified types of sub-national involvement (general consultation processes, national sustainable development councils/commissions and inter-ministerial committees, institutionalised mechanisms for better coordination between national and sub-national levels, links between NSDSs and sub-national sustainable development activities) are then explored in more detailed by describing examples of their application in individual Member States. This is followed by an exploration of general findings of sub-national involvement in NSDS processes and by conclusions and recommendations. Substantive parts of this QR represent a summary of the study *Contributions of regional and local authorities to sustainable development strategies* which was commissioned by the Committee of the Regions (CoR) and conducted by the Research Institute for Managing Sustainability (RIMAS).

*Disclaimer: The presented ESDN Quarterly Report includes a summary of the study entitled, 'Contributions of the Regional and Local Authorities to Sustainable Development Strategies', conducted by RIMAS for the works of the Committee of the Regions of the European Union. The study does not represent the official views of the Committee of the Regions.*

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### National Sustainable Development Strategies and vertical integration

In a recent article on taking stock of the governance of sustainable development, Jordan (2008, 17) referred to various international reports<sup>1</sup> that show the current unsustainable trends and argued that there is “demand for systems of governance that are capable of putting society on a more sustainable track”. As has been acknowledge by many scholars (e.g. Van Zeijl-Rozema et al, 2008; Meadowcroft, 2007; Steurer & Martinuzzi, 2005; Swanson et al, 2004) and by practical

experience in policy-making, sustainable development raises difficult governance challenges as the concept is “multi-faceted and broadly-defined” (Swanson et al, 2004, 5).

Since many years, *National Sustainable Development Strategies (NSDSs)* are used by governments as one specific tool to address these governance challenges. Especially because sustainable development implies integrating and balancing different sectoral policies and inter-generational time frames, a more comprehensive and longer-term approach to national policy strategy processes is important. In this context, NSDSs “provide an opportunity to take stock and make choices” (Meadowcroft, 2007, 157). The formal NSDS documents are important (a) to record agreed understandings and objectives, (b) to communicate these objectives and to coordinate them with actors within and outside of government, and (c) to provide a reference point for assessment and future learning. In so doing, NSDSs are intended to steer the governance of sustainable development. However, it should be noted that NSDS documents and related processes are not the only government activities of sustainable development decision-making in a complex and multi-faceted political system (Meadowcroft, 2007).

In order to increase the ‘steering role’ of NSDSs, comparative research (e.g. Steurer & Martinuzzi, 2005; Swanson et al, 2004) has shown that a strategic management approach is required. This approach involves several steps that are shown in Figure 1 below.



Figure 1: Steps in the strategic management of NSDS (Swanson et al, 2004, 5)

Based on the findings of interviews with NSDS coordinators from nineteen European countries, Steurer & Marinuzzi (2005) have coined the term ‘strategic public management’ as a new pattern of governance in relation to NSDSs. This concept has been fine-tuned over the years (Steurer, 2007) and comprises the following principles:

Principles	Operationalisation and description
(1) Common vision and strategic objectives	<ul style="list-style-type: none"> <li>• An NSDS should outline major objectives and define a common long-term vision for sustainable development (SD).</li> <li>• NSDS objectives should be operationalised with strategic objectives that are quantified and measurable.</li> </ul>
(2) Horizontal integration	<ul style="list-style-type: none"> <li>• The integration of economic, environmental and social issues should be taken into account               <ul style="list-style-type: none"> <li>◦ In the SD Strategy document (e.g. by highlighting links and trade-offs between the three dimensions of SD);</li> <li>◦ In the governance of the SD Strategy (e.g. by establishing inter-ministerial bodies that are responsible for implementing the SDS).</li> </ul> </li> </ul>

<p>(3) Vertical integration</p>	<ul style="list-style-type: none"> <li>• An SD Strategy should make sure that its vision and objectives are implemented at several levels of government ([EU], national/federal, regional, local) in an integrated/coordinated way.</li> </ul>
<p>(4) Participation</p>	<ul style="list-style-type: none"> <li>• Different stakeholder groups should be involved in the development and implementation of an SD Strategy</li> <li>• Participatory activities can be arranged as permanent councils for SD, ad-hoc stakeholder dialogues, informative/consultative internet actions, etc.</li> </ul>
<p>(5) Implementation mechanisms and capacity-building</p>	<ul style="list-style-type: none"> <li>• The objectives of an SD Strategy should be addressed with <ul style="list-style-type: none"> <li>◦ Provisions and mechanisms of implementation (budgeting, annual or bi-annual work/action plans) in which political responsibilities are clearly defined;</li> <li>◦ Adequate institutional and/or personal capacities or capacity building activities that are necessary to achieve the objectives</li> </ul> </li> </ul>
<p>(6) Monitoring, evaluation (quantitative and/or qualitative) and strategy renewal</p>	<ul style="list-style-type: none"> <li>• The effectiveness of an SD Strategy in achieving its objectives should be <ul style="list-style-type: none"> <li>◦ Monitored continuously with a set of SD indicators (mostly quantitatively) and</li> <li>◦ Reviewed/evaluated in regular intervals (mostly qualitatively).</li> </ul> </li> <li>• Monitoring and reviewing results/reports should be considered in the continuous adjustment and the cyclical renewal of an SD Strategy so that evidence-based policy learning takes place</li> </ul>

Table 1: Principles of strategic public management for NSDSs (Berger & Sedlacko © 2009, based on Steurer, 2007)

As Table 1 above shows, ‘*vertical integration*’ is one of the main principles of strategic public management for NSDSs. Generally, the concept of sustainable development transcends not only the competencies of sectoral ministries and departments of a national government, but also the different levels in a political administrative system. In other words, *many issues and topics of sustainable development cut across vertical levels of government and, thus, the coherence and coordination between the different government levels in NSDS processes is crucial in order to achieve a strategy’s objectives*. This is acknowledged not only in the guidance documents for developing NSDSs by the [United Nations \(UNDESA, 2001\)](#), the [OECD \(2001\)](#) and the widely known [NSDS resource book by Dalal-Clayton & Bass \(2002\)](#), but also in the [renewed EU SDS](#). One of the ten policy guiding principles of the renewed EU SDS is ‘policy coherence and governance’ which is defined as “promote coherence between all European Union policies and coherence between local, regional, national and global actions in order to enhance their contribution to sustainable development” (European Council, 2006, 5). Additionally, the renewed EU SDS defined an approach of ‘better policy-making’ that is “based on better regulation and on the principle that sustainable development is to be integrated into policy-making at all levels. This requires all levels of government to support, and to cooperate with each other, taking into account the different institutional settings, cultures and specific circumstances in Member States” (European Council, 2006, 6).

Although vertical integration is acknowledged as important for sustainable development in general and NSDS processes in particular, there has been so far no comprehensive study on the involvement of sub-national authorities in NSDSs<sup>2</sup>. A very general evaluation has been undertaken by the European Commission in their [first analysis of NSDSs in 2004](#) (European Commission, 2004) and the [first progress report on the EU SDS in 2007](#) (European Commission, 2007). More detailed information can be found in some research that has been undertaken in the past years: Baker & Eckerberg (2008) edited a book on new governance practices at the sub-national level in Europe, focusing mainly on sustainable development policy-making in general and only one contribution deals with NSDSs (Berger & Steurer, 2008). In reflecting upon the achievements in sustainable development twenty years after the publication of the Brundtland Report (1987) and the role of NSDSs processes, Meadowcroft (2007, 155) argued that “there are enormous differences in the way the process[es] have actually unfolded in different countries”. One important dimension of variation is intra- and inter-governmental coordination, i.e. the coordination and cooperation not only across central government, but also between the different levels of government.

The results of different research work recently undertaken on general aspects of NSDSs processes show that vertical integration is not sufficiently addressed in many countries. For instance, the OECD (2006, 23) in reflecting on [good practices in NSDSs](#) concludes that “only a few OECD governments have attempted to catalyse and fully coordinate with the sustainable development efforts at sub-national governments levels”. Steurer & Martinuzzi (2005, 462) analysed NSDS processes in various European countries and argued that “vertical integration is often either weak or non-existing”. However, *central government initiatives, like NSDSs, can only be effective when coordinated and*

*combined with actions at other political levels* (Meadowcroft, 2007).

In order to provide for a comprehensive and detailed analysis of sub-national contributions to sustainable development strategies in the EU, the [Committee of the Regions \(CoR\)](#) in 2008 commissioned a study that was carried out by the [Research Institute for Managing Sustainability \(RIMAS\)](#). The full study, entitled *Contributions of the Regional and Local Authorities to Sustainable Development Strategies* can be [downloaded from the publications website](#) of the Committee of the Regions. The next section describes the method and scope of the research and presents a summary of the study.

## Involvement of sub-national authorities in National Sustainable Development Strategy processes

### Method and scope

The study on the involvement of sub-national authorities in sustainable development strategies, commissioned by CoR, had the aim (a) to provide an overview of the renewed EU Sustainable Development Strategy, (b) to analyse the similarities and differences of NSDSs, with a special focus on vertical integration and (c) to conduct case studies of the contribution of regional and local authorities in NSDS processes in individual EU Member States. In this QR, only parts (b) and (c) are summarised. The project started in February 2008 and the final report was submitted to the CoR in December 2008.

For the analysis of similarities and differences of NSDS - particularly on vertical integration issues - the study team at RIMAS undertook qualitative telephone interviews with NSDS coordinators of the EU Member States. Between late February and mid-March 2008, 23 telephone interviews were conducted (covering 23 EU Member States). Moreover, the analysis was based on national background documents (NSDSs, progress reports, etc) and on the [national progress reports on implementing the EU SDS](#). On the basis of the analysis of NSDS processes in the EU Member States, the project team at RIMAS, together with CoR representatives, selected 11 EU Member States for an in-depth case study analysis on the involvement of sub-national authorities in NSDS processes<sup>3</sup>. In each of the 11 case study country, we carried out qualitative telephone interviews with 2-4 representatives of regional and local authorities (policy-makers and/or public administrators) between mid-May and mid-August 2008. The interviews were complemented by a document analysis for each case study country (including, e.g. NSDSs, policy documents, progress reports, studies, guidelines, etc). To sum up, the study is based on a total of 58 qualitative telephone interviews with representatives of national and sub-national authorities and a thorough document analysis.

Before presenting a summary of the study, it is important to outline its scope. As Meadowcroft (2007, 157) argued, it is important "to keep in mind a distinction between a national sustainable development strategy process, on the one hand, and the broader practice of strategic decision-making and policy implementation for sustainable development, on the other". The first refers to a formal strategy process, i.e. to the development, implementation and periodic review of an NSDS. The second denotes a much wider process of taking and implementing decisions that are of strategic significance for sustainable development. The study is focussed on the involvement of sub-national authorities in the *processes related to NSDSs*; thus, it does neither analyse the contribution of regional and local authorities to general decisions on sustainable development policies in the broad sense, the influence of party politics, nor the socio-economic framework conditions in a country.

In line with the theoretical framework of 'strategic public management' (see above) and the various steps in the policy process (Sabatier, 2007), the study focuses on the *NSDS policy cycle* which is shown in Figure 2 below.

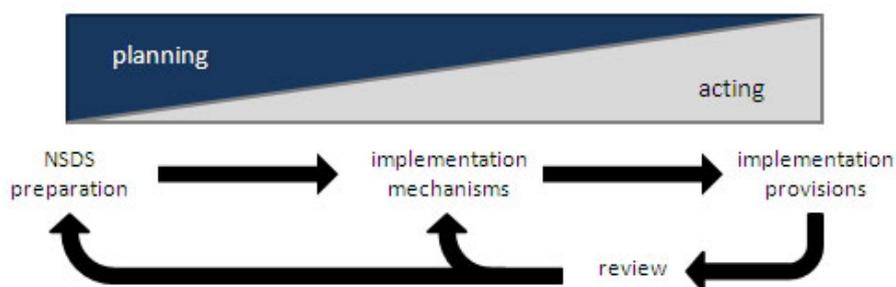


Figure 2: NSDS policy cycle (Committee of the Regions of the European Union, 2009)

Preparation (i.e. planning, strategy-making) and implementation (i.e. acting, delivering) are two ends of a continuum that usually involve one or more intermediary steps. These intermediary steps are referred to as 'implementation mechanisms'. To complete the cycle and to ensure learning processes, review mechanisms are applied. The stages of

the cycle outlined above are explained in some more detail below.

*NSDS preparation* is the strategy formulation process, in most countries delegated to the Ministry of the Environment, and often undertaken with the inclusion of societal stakeholders (Steurer & Martinuzzi, 2005). The preparation process is not necessarily conducted in the vein of traditional planning, even though in Figure 2 the term 'planning' is used; however, the preparation process usually charts broad objectives and long-term strategic approaches. Not always (i.e. not in every country, not for every objective or policy area) are the objectives accompanied by concrete implementation mechanisms and/or provisions.

In these cases, additional mechanisms following up on the preparation stage are utilised which are referred to as *implementation mechanisms* in Figure 2. These mechanisms serve to translate the strategic objectives of NSDSs into concrete and measurable tasks, aim to ensure policy integration and coordination, and build capacity. Examples are various institutional and non-institutional mechanisms such as working groups, sustainable development councils/commissions, inter-ministerial committees and other institutionalised forms of vertical and horizontal integration as well as action plans, work programmes and sectoral plans.

The concrete and measurable tasks that are based on the NSDSs are called *implementation provisions* in Figure 2. They involve the preparation and adoption of new laws and regulations, preparation and implementation of lower-level strategies, implementation of new procedures such as assessments of policy proposals or changes in budgeting procedures, and investments. Implementation provisions are, therefore, on the other end of the 'preparation-implementation continuum'.

A *review* of the NSDS processes usually follows at some point – either as a review of an implementation mechanism (e.g. work programme, work of an inter-ministerial commission) or of the whole strategy process.

## Sub-national involvement in NSDSs in the EU Member States

Before going into detail on sub-national involvement, we present some *basic information on NSDSs in the EU Member States*.

On the basis of information available to us by the end of 2008, *25 EU Member States have adopted an NSDS and are thus in the process of NSDS implementation*. Exceptions are: (i) Bulgaria, where the NSDS has been submitted for adoption to the Council of Ministers, and (ii) the Netherlands, where it was decided – on the basis of the peer review on their previous Action Programme 'Sustainable Action' (approved in 2003 and finished running time) – not to prepare a separate NSDS document, but to develop a 'strategic approach for sustainable development', i.e. the Dutch Government intends to make sustainable development part of the whole policy process (several topics which are associated with NSDS processes are included in this approach, e.g. annual sustainable development report, monitoring, national stakeholder dialogue, etc). Most EU Member States adopted their NSDSs between 2000 and 2007. Only five current EU Member States adopted their NSDSs or similar documents in the 1990s<sup>4</sup>. *Six Member States have already revised their NSDSs*: Belgium, Finland, France and Romania so far made one revision; the UK made two revisions; and Sweden made three revisions. Currently, *NSDS revisions are ongoing or planned in 13 EU Member States*. Apart from a general update of their NSDSs, the main reason for the high number of revisions is to bring the NSDSs in line with the objectives of the renewed EU SDS. *In most EU Member States, the Ministries of Environment are responsible for the coordination of the NSDS preparation and implementation process*. In four Member States, the responsibility lies with the Government Office, Prime Minister's Office or Federal Chancellery (in Germany, Malta, Slovakia and Slovenia).

In the following part, we present *detailed information on the involvement of sub-national authorities in NSDS processes*. This information is mainly based on the qualitative telephone interviews with representatives of sub-national authorities in the 11 case study countries<sup>5</sup>, with additional information provided by the interviews with NSDS coordinators. We would like to highlight that in the full study, we also analysed the respective political-administrative systems of the case study countries and its implications for the governance of sustainable development. However, due to the limited space of the QR, we cannot present this analysis here and we once again refer you to download the [full study](#).

In a majority of EU Member States, the sub-national levels are – of course depending on the respective political-administrative systems – involved in NSDS processes. However, the degree of involvement of regional and local authorities varies substantially between Member States. The study distinguished between *four types of sub-national involvement in NSDS processes*:

1. Involvement of sub-national authorities in general consultation processes of NSDS preparation and/or of review processes for and preparation of renewed NSDSs,
2. Involvement of sub-national authorities in sustainable development councils/commissions and inter-ministerial committees,
3. Institutionalised mechanisms for better coordination between national and sub-national authorities, and

#### 4. Links between NSDSs and sub-national sustainable development activities.

In the following sections, we present examples of these four types in selected EU Member States.

### General consultation processes

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Most EU Member States involve representatives of sub-national authorities in the general consultation processes when preparing the NSDS document, organising a review of the current NSDS and/or drafting a revised NSDS (e.g. invitation to submit written comments/feedback on the draft NSDS, workshop, conferences, etc). However, *sub-national authorities in these processes are only one of many stakeholder groups that are invited to provide feedback*. Examples are:

In *France*, a country-wide stakeholder consultation process has been organised. This process was called 'grenelle environnement' and started in September 2007 (running time until spring 2008). More than 800 stakeholder representatives, including representatives from the sub-national levels, participated regularly in 33 working groups. The results of the working groups will be used in the revision process of the French NSDS (expected to be completed during 2009).

In *Malta*, the preparation process of the NSDS (2006) included an extensive consultation process, involving different societal stakeholder groups. Between May and December 2004, eight consultation sessions with various stakeholders, including local authorities, have been organised. The aim of the consultation meetings was to gather comments on the draft NSDS and to discuss specific concerns relevant to the strategic direction and objectives of the draft NSDS. Due to the extensive number of submitted comments, the interview partners from the local level said that it is difficult to trace the impact of any specific comments from local authorities and meetings with local authorities in the final NSDS document and its strategic objectives.

The preparatory process of the *Spanish NSDS (2007)* included several types of national-level events with the aim to involve different stakeholders and to receive their comments on the draft NSDS. The most important participatory event during this preparation phase was the 'Conference on the Sustainable Development Strategy' that was held in Madrid during three days in July 2007. Each stakeholder group had the right to nominate one representative and invite one external expert to the conference. Autonomous regions were also invited to participate with representatives of their environmental departments. Individual provincial and local authorities were represented indirectly through the Spanish Confederation of Municipalities and Provinces. The conference consisted of 7 workshops on the various dimensions and objectives of the draft NSDS and a concluding plenary session. In each workshop, one thematic area of the draft NSDS document was discussed. The interview partners from the sub-national level pointed out that the draft NSDS has been sent too short in advance of the conference to allow for proper analysis of the document and preparation of a sub-national position for the workshop. The sub-national interview partners described the impact of the autonomous regions on the final NSDS as limited. Although a significant amount of comments raised at the conference has been taken up in the final text of the NSDS, comments which would have required substantive revisions of the draft NSDS were not included. Therefore, the sub-national interview partners suggested a longer preparatory process with repeated opportunities for sub-national consultation in order to have an effective impact on the final NSDS documents and its objectives.

In the *Czech Republic*, regional round tables (RRTs) for the revision process of the current NSDS and in preparation of a renewed NSDS were established by the Government Committee for Sustainable development in 2006. The main aim was to reveal problems and challenges in the implementation of the NSDS from the perspective of the sub-national levels. In total, 14 RRTs were held during 2006 and 2007. All RRTs had a common format: morning sessions were attended by several public administrators from national ministries (mainly those responsible for sustainable development) and the political representatives of the regions (most notably chiefs of divisions, especially of the environment). Typically up to 10 participants met in the morning sessions and the regional politicians presented questions and pressing problems of the regions. The interviewees from the regional and local levels share the view that the morning sessions did not serve to achieve any tangible outcomes. Their function was rather to raise interest of regional political representatives in sustainable development and the NSDS objectives. The afternoon sessions were aimed at various stakeholder representatives, coming from e.g. public administration and strategic development, environment, social policy, education, business, agriculture, and transport. Several shortcomings of the RRTs were highlighted by the sub-national interview partners: one of them was that the national level had provided only very little support in terms of information and finance; another shortcoming was the lack of feedback provided to the participants after the events.

### National sustainable development councils/commissions and inter-ministerial committees

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In the 14 EU Member States<sup>6</sup>, *representatives of sub-national authorities are among the various members of sustainable development councils/commission or inter-ministerial committees*. These bodies usually have various tasks and

responsibilities, including horizontal integration (coordination between different departments/ministries and their sectoral policy agendas), providing advice to national governments on NSDS processes, drafting progress or indicator reports and overseeing NSDS implementation efforts. We describe selected examples below:

The *Finnish National Commission on Sustainable Development* (FNCSD) was established in 1993 as a response to the Rio Summit in 1992. From the beginning, the FNCSD involved not only business and civil society stakeholders, but also a significant number of government officials - both politicians and public administrators from different national ministries and the regional and local level. The currently 45 members of the FNCSD (including 2 local and regional government representatives) are selected and appointed by the government for a five year term. They meet 4-5 times a year and the meetings are chaired by the Minister of Labour, with other sectoral ministers also regularly attending the meetings. The FNCSD has a number of key functions, e.g. discussion forum, consensus finding and political guidance mechanism, policy coordination mechanism, critical review of government strategies like the NSDS process. Sub-committees of the FNCSD are established when there is need to discuss and coordinate specific policy issues more in-depth (see below the example of the sub-committee on regional and local sustainable development). One major task in relation to the NSDS process was that a sub-committee of the FNCSD developed the renewed Finnish NSDS of 2006. In the NSDS preparation process, broad consensus among all involved stakeholder - including the sub-national level - was a major issue. More on the FNCSD and its work can be found in a [previous ESDN Quarterly Report](#).

The *Committee for a Sustainable Austria* was established in 2002 as an inter-ministerial body for steering the NSDS implementation process. As central implementation body of the NSDS, the Committee brings together different stakeholder groups in order to define working programmes (with concrete projects and measures for implementing the NSDS objectives) and to prepare annual progress reports on the implemented activities. The Committee consists of about 30 high-level public administrators from 13 national government ministries and representatives of the following stakeholder groups: chamber of labour (3 representatives), trade union (1), chamber of agriculture (2), chamber of commerce (1), federation of industry (1) and the regions (4). The regional representatives are regional sustainable development coordinators (public administrators) from four of the nine Austrian regions. Two of the regional Committees members, who were interviewed for the study, pointed out that the Committee in practice is mainly a mechanism for horizontal integration between the national government ministries. They argued that the regions were only marginally involved in the development of NSDS work programmes and progress reports and no specific space for coordinating national and regional issues was established in the Committee. Nevertheless, the Committee meetings were used as a platform for exchanging information between the national and regional public administrators and for networking between the different stakeholder groups. Moreover, the Committee achieved several other effects which are considered as important in the regions: (a) a better cooperation and exchange on NSDS issues between the national and regional public administrators which led to several cooperation mechanisms (e.g. funding schemes for sustainable development); (b) regional public administrators could establish personal and informal contacts with representatives of different national ministries that did not exist before; (c) several spill-over effects could be achieved, e.g. participating in the Committee fostered substantive learning and increased capacities among the regional public administrators (i.e. learning how to address cross-sectoral policy integration) and it helped regional sustainable development coordinators to push sustainable development at the regional level by referring to concrete sustainable development activities carried out at the national level.

In *Slovenia*, the National Council for Sustainable Development is the major institutional body for fostering cross-sectoral integration throughout the implementation of the NSDS. The members of the National Council come from most national government ministries as well as local authorities, universities, civil society organisations and the business sector. Local authorities are represented in the National Council by two members of the associations of municipalities. The National Council meets 5-6 times a year and mainly discusses strategic policy issues in the context of the NSDS as well as legislation and strategic documents with regard to NSDS objectives. Moreover, the National Council has several working groups on different topics (e.g. sustainable transport). The sub-national representatives interviewed for the study (one of them a member of the National Council) argued that the National Council for Sustainable Development established a direct dialogue and exchange on implementing NSDS objectives between the national level and local authorities. It improved the interplay among policy-makers and public administrators from the national and local levels and increased procedural learning in that the local authorities were given the opportunity to delegate two representatives in the National Council. Nevertheless, the concrete influence of local authorities on NSDS implementation and sustainable development policy formulation through the National Council is limited because they are only one of several stakeholder groups represented. Moreover, the National Council so far has not been successful in establishing intensive cooperation between different stakeholder groups on sustainable development issues.

## **Institutionalised mechanisms for better coordination between national & sub-national levels**

The first two types for sub-national involvement in NSDS processes are mainly characterised by general consultation and participation. We found only three EU Member States that have established institutionalised mechanisms for better

coherence and coordination between the political levels in the NSDS processes. *These are the most comprehensive vertical integration mechanisms and come closest to what is required in strategic public management of NSDSs.* We shortly summarise the three mechanisms below:

In Austria, the *Expert Conference of Sustainable Development Coordinators* was established in 2000 - two years before the NSDS was adopted - by a decision of the Conference of Regional Environmental Ministers (political body). The Expert Conference consists of 15 members, namely the sustainable development coordinators (public administrators) of the national and regional governments: two representatives of the national Ministry of the Environment and one or two representatives of each of the nine regions. The Expert Conference meets twice a year, takes decisions unanimously and reports to the Conference of Regional Environmental Ministers. According to our interview partners, the Expert Conference has four main objectives: (a) exchange of information of the sustainable development activities between the national level and the regions; (b) coordination between the national level and the regions in NSDS implementation; (c) development of common sustainable development standards (e.g. quality management of processes, LA 21 quality standards); (d) cooperation between the regions in developing programmes and activities. The Expert Conference can also establish working groups for specific tasks. Recently, the importance and responsibility of the Expert Conference has increased substantially: until the first half of 2009, it will prepare the first common Sustainable Development Strategy for the national and the regional levels in Europe. Through this task, the Expert Conference has acquired a higher political relevance in sustainable development policy-making in Austria. Generally, the Expert Conference has been an important cooperation and coordination body between the national and regional public administrators on sustainable development issues before and since the NSDS was adopted in 2002. It fosters continuous and informal exchange between the sustainable development coordinators of both levels and among the regions themselves. However, the interviews with regional members of the Expert Conference revealed that the regions' contribution to NSDS implementation through this body was limited, mainly because the NSDS is binding for the national level only (which is an important fact in federal political systems like Austria, where the regions have their own separate responsibilities in relation to sustainable development). Nevertheless, the cooperation between the national and regional representatives in the Expert Conference brought more sub-national perspectives into the NSDS process, focusing on sectoral policy fields or areas of highest relevance to the regions (e.g. LA 21, rural policies): public administrators on the national level became more aware of sub-national issues which led to a less top-down oriented approach in sustainable development policy-making. Moreover, the regular exchange among regional sustainable development coordinators fostered the development of common projects and helped the individual coordinators to put pressure on policy-makers in their own regions to implement successful sustainable development activities of other regions. It is also important to note that the long-term cooperation between national and regional sustainable development coordinators in the Expert Conference fostered the need to develop the first common sustainable development strategy of the national and regional level in Europe.

The *Sub-committee on Regional and Local Sustainable Development of the Finnish National Sustainable Development Commission (FNCSO)* is another example of an institutionalised mechanism for the coordination between the national and sub-national levels on NSDS processes. The sub-committee has been established in 2007 with a mandate until 2010. It is chaired by the State Secretary of the Ministry of Employment and Industry and vice-chaired by the representatives of a regional environment centre and a municipality. The sub-committee consist of about 30 members, including representatives of six national government ministries and state regional-level institutions (i.e. regional environmental centres), one representative of the association of municipalities, six representatives of individual municipalities and regions as well as representatives of NGOs and business associations. The main functions of the sub-committee are to promote sustainable development in regional and local administrations as well as in their cooperation with each other and with the national government. A special task of the sub-committee is to contribute to the implementation of the NSDS (2006) and to take initiatives in the national sustainable development policy process. An underlying principle of this newly-established sub-committee is the focus on concrete activities, i.e. activities that bring some tangible results, especially in areas like climate change mitigation and adaptation, energy, waste management, community planning, etc. The interviews with sub-national members of this sub-committee revealed that several organisational issues may prevent it from reaching its full potential. On the one hand, meetings so far have been infrequent (approx. every three months) and the time available for discussion in the individual meetings is felt as too short. On the other hand, meetings are organized in Helsinki and travel costs have to be borne by the individual member organizations, which constitutes a considerable burden for some institutions. This means that the results of the sub-committee meetings might be affected by limited time for personal exchange, high travel and opportunity costs associated for participating in the meetings, and the relatively high-level of aggregation of discussed issues. An analysis of the impacts of the sub-committee on the NSDS process is difficult, because it only exists since 2007. Nevertheless, the interviews with sub-national representatives revealed several preliminary outcomes: (i) the strong political backing of the FNCSO also affects the work of its sub-committees; (ii) the regional and local sustainable development sub-committee enables a better coordination and information exchange between the national and sub-national level on sustainable development policy in general and NSDS processes in particular; (iii) the sub-committee provides a setting for repeated interactions and informal relations between representatives of different political levels; (iv) the sub-committee has contributed to a better understanding of specific concerns of each political level on sustainable development issues; (v) however, the sub-committee could so far not influence

specific measures and policies in relation to the NSDS.

Because *Germany* has a distinctive federal political-administrative system, the main mechanisms for coordination and exchange between the national government and the regional states are the 'Conferences of Sectoral Ministers' (political level) and the 'National-Regional Working Groups' (administrative level). Each conference of the sectoral ministers establishes a number of national-regional working groups on different topics that are given concrete mandates from the conference and need to report to the respective conference which then takes a political decision on the suggestions made. Each working group consists of public administrators of all 16 regional states and public administrators of the national government ministries. Sustainable development issues are covered by the 'Conference of the Environmental Ministers' (UMK). Currently, the UMK has eight working groups, ranging from sectoral working groups (on water, waste, nature protection, genetic engineering, etc) to the 'National-Regional Working Group on Climate, Energy, Mobility and Sustainability' (BLAG KliNa). The BLAG KliNa was established in November 2007 and the first meeting was held in January 2008. Among its mandates are the stock-taking of regional sustainable development strategies, an update of sustainable development indicators, developing a common position on environmental information systems, etc. Moreover, as one regional interview partner pointed out, the BLAG KliNa is meant to take over the work of the previous 'National-Regional Working Group on Sustainable Development' (BLAG NE) which mainly focused on the information exchange between the national and regional level on sustainable development strategies, sub-national contributions to the NSDS, development of sustainable development indicators, etc. The new working group (BLAG KliNa), however, focuses mainly on sectoral environmental policy issues (particularly on climate and energy issues) rather than strategic sustainable development issues. Generally, because they are linked to political decision-making bodies (the conferences of sectoral ministers), national-regional working groups are important coordination platforms as they can influence policy decisions at the national and regional levels. Regarding sustainable development, the national-regional working groups are mainly used for exchange and discussions between public administrators from the national and regional level on general sustainable development issues rather than for coordinating NSDS implementation. The main reason for this is that the NSDS is - similar to Austria - only binding for the national state and the strong independence of the regional states makes coordinating NSDS objectives a challenging task. Nevertheless, the national-regional working group created some valuable outcomes for the NSDS process: Firstly, the working groups developed a sustainable development indicator set and thus contributed to the operationalisation of NSDS objectives. The indicator set also provides a useful tool for public administrators to implement (or adopt) these indicators at the regional level and thus create some pressure on regional policy-makers ('spill-over effect'). Secondly, regular meetings of the national-regional working groups enabled the development of personal contacts between public administrators from the national and regional levels and thus fostered better networking and informal exchange of information on sustainable development issues also outside of the working groups.

## Links between NSDSs and sub-national sustainable development activities

In most EU Member States, the sub-national levels have developed their own sustainable development activities. *The types of sub-national activities are, however, very diverse (e.g. LA 21 initiatives, regional sustainable development plans or programmes, sustainable development round tables, sectoral policy initiatives, etc) and thus the link to NSDS processes varies greatly.* In this section, we present two examples of how sub-national activities can be linked to the broader NSDS process. More examples can be found in the full CoR study.

In order to boost the implementation of climate and energy objectives of the *Danish NSDS (2002)*, the Ministry of Energy has launched an annual 'Energy Camp' initiative in 2004. The energy camps bring together national and international experts with national and sub-national public administrators to discuss sustainable energy issues. In the 2006 energy camp, the idea of a demonstration project was presented by the national level to see if it is possible to transform one Danish city from depending on fossil fuels to using 100 per cent renewable energy resources. Several cities were considered for this demonstration project, among them Odense with a population of approx. 150,000 inhabitants. Finally, however, Frederikshavn was chosen for the demonstration project, 'Energy City Frederikshavn', with the aim to supply the whole city (25,000 inhabitants) with energy coming entirely from renewable energy resources by the year 2015. 'Energy City Frederikshavn' is run by the municipality and a project management team was established in June 2008. Moreover, the municipality is collaborating with energy producers (which are not always public entities) to reach the objective of the demonstration project. The interview partner from Frederikshavn pointed out that the Ministry of Energy provided the framework for the organisation of the Energy Camps and the national government wanted to move in this direction. However, it was up to the sub-national levels, particularly the municipalities, to make things happen. It was recognised that a pure top-down approach was not enough because strong commitment from the sub-national levels is crucial for the implementation. Moreover, municipalities with experiences in energy reduction were involved in developing the Danish Energy Strategy. This strategy was adopted by the Danish government in February 2008 with the aim to reduce the country's total energy consumption by 2 per cent by 2011 as compared to the 2006 levels and to increase the share of renewable resources in the total energy consumption to 20 per cent (and thus also meeting objectives of the Danish NSDS). To sum up, climate change and

energy policy are not only priorities of the Danish NSDS, but also important policy topics of the recently elected Danish government. Although these national policy priorities initiated many policy processes at various political levels, we could observe a strong and independent political commitment resulting in the initiation of several activities at the level of local authorities.

The revised *French NSDS (2006)* and its plan of action address Local Agenda 21 in the theme of 'territorial dimension of sustainable development'. In these strategy documents, the French government presents the objective to support the establishment of 500 LA 21 initiatives at all sub-national levels within 5 years from the adoption of the NSDS. According to the national coordination office for LA 21 at the Ministry of Ecology and Sustainable Development, approximately 400 LA 21s have already been reported until the end of 2008. Our interview partners emphasized a rapid growth of interest of mayors and political representatives at the level of urban communities to participate in LA 21 processes. Among the main instruments utilized at the national level to support the development and good performance of LA 21 processes is the 'Local Agenda 21 Reference Framework' and the associated award of recognition by the national government. Moreover, the Ministry of Ecology and Sustainable Development has published guidance documents with recommendations for developing an LA 21 initiative and adopting concrete measures for individual sectors. The LA 21 Reference Framework has been finalized and announced to the prefects of regions and departments by the Ministry of Ecology and Sustainable Development in July 2006, several months before the adoption of the revised NSDS. Several municipal representatives participated in a preparatory group, offering their previous LA 21 experiences and testing the Reference Framework's applicability so as to prevent it being 'too far from local realities'. The Reference Framework, therefore, represents an attempt to 'localise' the national sustainable development framework established by the NSDS. The LA 21 processes and commitments pursued by sub-national authorities at the levels of municipalities, various inter-municipal bodies, departments and regions should correspond with the thematic objectives and procedural aspects of the Reference Framework. Authorities also have the opportunity to undergo evaluation and receive an award of recognition by the Ministry of Ecology and Sustainable Development. Some municipalities and inter-municipal bodies choose objectives identical with those of the Reference Framework, while others tailor the Reference Framework to their own sub-national needs and conditions. Once a year, the sub-national authorities have the opportunity to submit detailed descriptions of their LA 21 projects to the Ministry, focusing on their linkages to the Reference Framework and thus the NSDS. Representatives of the authorities also receive an opportunity to present their projects in front of the representatives of the Ministry as well as the national and regional LA 21 committees. The awards of recognition is granted for three years and prolonged on the basis of good future performance. There are two main achievements of the Reference Framework: on the one hand, it helps to translate NSDS objectives to the sub-national level and, on the other hand, it encourages sub-national authorities to initiative their own sustainable development activities and links them to the NSDS.

## Findings on sub-national involvement in NSDS processes

In this section, we summarise the main findings of sub-national involvement in NSDS processes regarding the four types of involvement identified in the study. This is mainly based on the 11 case studies, but also takes into account the results of the general overview of NSDS processes in Europe in order to provide a comprehensive overview of the situation in the EU Member States.

### General consultation processes

- Mechanisms of involving sub-national levels in general NSDS consultation processes strongly depend on the prevailing 'political culture' of a country, mainly the existing patterns of interaction between national and sub-national levels, but also between sectoral ministries. Therefore, the processes of NSDS preparation often come in forms and utilize techniques that do not challenge established patterns of governance.
- Various shortcomings in information provision prior to and following the mechanisms for NSDS preparation are common: sub-national authorities are involved in the process of NSDS preparation at a late stage; accompanying documents for NSDS preparation are usually extensive and complex and not adjusted to the information needs of sub-national authorities; national ministries responsible for NSDS preparation present only insufficient information about the concrete role of sub-national authorities in the process; there is a lack of feedback to sub-national authorities about the concrete use or impact of their inputs following the NSDS preparation process.
- The forms (public hearings, workshops, submitting comments, round tables etc.) and techniques (moderation techniques, visualization techniques, delineation of 'expertise' and dealing with data etc.) utilized for the involvement of sub-national authorities are usually not designed to target coordination of sustainable development objectives across political-administrative levels and associated administrative practices.
- Although representatives of regions and local authorities (policy-makers and public administrators) are involved

to a varying degree in the preparation of NSDSs, their influence on the final NSDS document (including NSDS objectives) and its implementation mechanisms and provisions (such as responsibilities, laws and subsequent strategies, concrete actions, but also budgeting procedures, institutional arrangements, monitoring procedures, etc.) is limited.

#### **National sustainable development councils/commissions & inter-ministerial committees**

- National sustainable development councils/commissions and inter-ministerial committees are important institutional bodies for NSDS implementation and cross-sectoral integration. They were specifically created to support the NSDS processes and can act in a spectrum of different functions, such as policy agenda setting, horizontal policy coordination and integration, conflict mediation, networking platform, monitoring and evaluation, facilitation of public engagement, forum for exchange of best practices etc.
- In most cases, the number of sub-national representatives in national sustainable development councils/commission and inter-ministerial committees is small and, therefore, the impact of sub-national authorities on the decisions of these bodies are limited (as one stakeholder group amongst many others).
- National sustainable development councils/commissions and inter-ministerial committees are not strong coordination mechanisms between the different political levels in NSDS implementation (i.e. no direct influence of sub-national levels on concrete implementation measures). However, they can create positive effects for cooperation between the political levels that were unintended by their original objectives: better information exchange between political levels; more informal cooperation between sub-national authorities and different national government representatives; spill-over effects on the regional level such as increased awareness and political will for sustainable development, i.e. substantive learning (addressing cross-sectoral policy integration) and support for regional administrators to push sustainable development in their administrations.
- Although several stakeholder groups are represented in national sustainable development councils/commission and inter-ministerial committees, the cooperation between the stakeholders on sustainable development issues in general could not be improved: Firstly, these councils and committees primarily focus on a national policy documents (NSDSs) and the national sustainable development process; thus, the main exchange and cooperation activities are between national government representatives and the stakeholder groups, not among the stakeholder groups themselves. Secondly, these councils and committees are only one of many platforms of exchange for stakeholders on sustainable development issues.

#### **Institutionalised mechanisms for better coordination between national & sub-national levels**

- These mechanisms (e.g. 'Expert Conference of National and Regional SD Coordinators' in Austria, 'National-Regional Working Groups' in Germany, 'Sub-committee on Regional and Local SD' in Finland) are important platforms for coordination among public administrators from the national and sub-national levels to increase coherence on various sustainable development policy issues. As policy coordination is particularly important in federal states because of the extended responsibilities of sub-national levels, they are more likely to be established in federal states.
- The main difference compared to national sustainable development councils/commissions and inter-ministerial committees is that these institutionalised mechanisms serve the main purpose to increase coordination and exchange between public administrators from the national and sub-national levels. Moreover, the number of sub-national representatives in these institutional mechanisms for coordination is much higher than in national sustainable development councils/commissions and inter-ministerial committees.
- Although these institutional mechanisms are intended to coordinate the development of NSDSs and/or the implementation of NSDS objectives and related policies, their main impact is on improved information exchange among the public administrators from the national and regional/local levels. Therefore, the regional public administrators could not specifically influence the general development and implementation of NSDS objectives through these institutionalised mechanisms.
- The examined institutional mechanisms, however, fostered several important developments in sustainable development governance: (a) through regular meetings, personal contacts and informal exchange on sustainable development issues among public administrators from the national and sub-national level could be improved; (b) moreover, such as is the case of Finland, an increase of horizontal information exchange and coordination among sub-national authorities and between sub-national authorities and other stakeholders could be achieved; (c) the cooperation in the institutionalised mechanisms led to the development of common projects, e.g. development of sustainable development indicators for the national and regional level in Germany or the competition on implementing environmental plans prepared in Finland; (d) regular exchange among the public administrators from the national and sub-national levels created more awareness of regional and local perspectives on sustainable development issues at the national level, i.e. of sub-national levels as 'landing place of sustainable development'; and (e) the long standing institutional mechanism in Austria (Expert Conference of SD

Coordinators) fostered the need of developing the first common sustainable development strategy of the national and regional level in Europe.

- However, the institutional mechanisms could not achieve a comprehensive vertical integration in the NSDS processes: they have not created a strategic framework of responsibilities for implementing NSDS objectives across political levels.

#### Links between NSDSs and sub-national sustainable development activities

- The study revealed several important features regarding the link between the NSDS processes and sub-national sustainable development activities:
  - Regional sustainable development strategies and similar programmes take NSDS documents into account, but are largely developed as bottom-up strategies reflecting regional circumstances. Due to the fact that coordination and cooperation mechanisms in most EU Member States have only limited impacts, the link between the NSDS processes and the regional sustainable development strategies is weak.
  - In some EU Member States (e.g. Italy, Spain), the regions are more advanced in sustainable development strategy development and implementation compared to the national level. This is particularly the case when there are no NSDS implementation measures foreseen at the national level and the cooperation between the national and sub-national levels on sustainable development issues is traditionally weak.
  - Sustainable development strategy processes on the sub-national levels foster the cooperation between regional/local stakeholders and increase network-like governance structures.
  - Both regional and local authorities develop their own sustainable development policy objectives. The study shows that many sub-national authorities address energy policy and climate change issues and show considerable political commitment in their implementation efforts (e.g. Denmark, UK). This focus on energy and climate policy, however, is more a result of the current importance of these topics rather than a result of the NSDS processes.
- Although LA 21 is referred to in many NSDSs, the national levels mostly lack effective tools to steer these bottom-up initiatives and, therefore, their relevance in NSDS processes and for NSDS implementation is rather limited. In most countries, the major role of LA 21 lies in fostering cooperation among different stakeholder groups and between local and regional public administrators at the sub-national level (e.g. Germany, Italy).
- Local Agenda 21 processes still exist in many countries, but their importance for sustainable development policy-making on the local level is decreasing. There are two reasons for this development that at first glance seem contradictory but exist in parallel: As current challenges require more comprehensive approaches, local authorities increasingly establish programs and processes that reflect the integrated character of sustainable development and are not referred to as LA 21. On the other hand, local authorities address specific environmental issues with clear objectives and targets, e.g. climate and energy policy. Therefore, the rather 'soft focus' of LA 21 on citizen participation seems to be replaced by stronger efforts for policy integration and targeted sectoral policy approaches.

## Conclusions and recommendations

In this final section, we present conclusions and policy recommendations for a better involvement of sub-national authorities in NSDS processes, based on the 11 country case studies and the general overview of sub-national involvement in NSDS processes in the EU Member States:

In the EU Member States, mechanisms for involving sub-national levels in NSDS preparation and implementation are limited and depend to a large part on existing patterns of interaction between national and sub-national levels. Therefore, it is *necessary to establish a stronger interaction and cooperation between national and sub-national levels on governance issues in general and sustainable development policy in particular*. The importance of sub-national levels in NSDS processes mainly lies in their role and responsibility in implementing NSDS objectives. Our results show that public administrators from both, the national and sub-national levels, would welcome a stronger cooperation and coordination between the different political-administrative levels on sustainable development issues and the NSDS process. In this context we would like to present several suggestions:

- In order to *increase the meaningful contribution of sub-national levels in NSDS preparation* at the national level it is necessary (a) to involve regional and local authorities at an earlier stage in NSDS preparation (i.e. before the main objectives are defined); (b) to design mechanisms and procedures for the process of NSDS preparation that involve regional and local authorities and ensure coordination of sustainable development policy objectives across political-administrative levels; (c) to distribute information to sub-national representatives that is suitable for their information needs; and (d) to provide clear feedback to the sub-national

levels on their contribution in the NSDS preparation process in order to increase trust and willingness to support the process at the sub-national levels.

- The results of the study show that the particular and complex nature of sustainable development policy-making and NSDS processes (i.e. integration of various policy fields and political-administrative systems, inclusion of stakeholders, etc), ***require formal and informal mechanisms of cooperation and exchange between national and sub-national authorities***: On the one hand, formal mechanisms (e.g. national SD councils or commission, inter-ministerial committees) have an official character and a clear mandate for sub-national involvement in NSDS processes. On the other hand, informal mechanisms are increasingly important as they support network-like governance structures and informal exchange among national and sub-national actors (policy-makers and administrators) and possibly also non-public stakeholders. Therefore, mechanism that create opportunities for repeated and formal/informal interaction of a relatively stable group of people (e.g. policy-makers, public administrators, other major stakeholder representatives) foster the development of shared values among the involved actors that can ultimately improve effective policy integration.
- ***Sub-national representatives (either policy-makers or public administrators) should increasingly be involved in formal institutional mechanisms for exchange and cooperation in NSDS processes***: Although in practice these mechanisms (i.e. national sustainable development councils, inter-ministerial committees and institutionalised bodies for coordination between political-administrative levels) only rarely contribute directly to vertical policy integration, they serve other important functions related to the NSDS process: better information exchange between political levels; more informal cooperation between sub-national authorities and different national government representatives; spill-over effects on the regional levels such as increased awareness and political will, i.e. substantive learning (addressing cross-sectoral policy integration) and support for regional administrators to push sustainable development. Therefore, in the long-term, these mechanisms have also a positive impact on sustainable development governance in general.
- However, in order to guarantee a meaningful involvement of sub-national authorities in these institutionalised mechanisms, ***it is necessary to establish certain provisions***: (a) sub-national levels must be considered as a major stakeholder and/or partner in these institutions and not only one stakeholder amongst many others; (b) the role of sub-national levels must be clearly defined and communicated in order to enable full commitment of regional and local authorities and avoid wrong expectations; (c) enough space and time must be provided for the exchange and coordination between national and sub-national authorities on important NSDS issues, particularly on NSDS implementation which concerns regions and local authorities the most; (d) these mechanisms need broadly accepted structures, must evolve over time, and enable formal and informal exchange; and (e) the involvement of sub-national authorities should be guaranteed within their resource capacities (e.g. budget, personnel, time).
- ***A better link between NSDS processes and sub-national sustainable development activities should be established in the EU Member States***: Firstly, it is important for NSDS processes to utilize bottom-up initiatives at the sub-national level that reflect regional circumstances and challenges and involve regional stakeholders. Secondly, experiences on the sub-national level with addressing sustainable development issues 'on the ground' can provide meaningful insights for NSDS implementation. Finally, the objectives of sustainable development strategies, programmes and initiatives on all political levels should be coordinated in order to achieve best results in sustainable development policy-making.
- ***Better integration of Local Agenda 21 initiatives and NSDS processes is preferable***: LA 21 initiatives can make an important contribution in NSDS implementation (e.g. increase cooperation between stakeholders, foster 'ownership' of NSDS at the local level, increase learning and capacity-building for sustainable development in general, etc). It is, therefore, advisable for the national governments to develop effective tools to steer LA 21 initiatives in the context of the entire NSDS process. Moreover, to address the need for more comprehensive approaches at the local level, other programs and processes which reflect the integrated character of sustainable development and which are not referred to as LA 21 do exist (e.g. Brundtland towns, Healthy Cities, sustainable cities, sustainable community initiatives, etc.) and also offer important potential contributions to the NSDS process.
- One of the most significant challenges of sustainable development governance (and, therefore, of NSDS preparation and implementation) is to ***establish mechanisms for effective cross-sectoral (horizontal) policy integration***, both at the national and sub-national levels. Cross-sectoral policy integration goes beyond mere integration of environmental concerns into other policy sectors (this is called 'environmental policy integration'). In order to develop inter-linkages between the various policy sectors in a strategic manner and at every political-administrative level, the necessary prerequisites are (a) high-level political commitment for sustainable development, (b) clear and strong institutional responsibilities for sustainable development and (c) strategic coordination among the national and sub-national levels.

## Notes

<sup>1</sup> UNEP (2007), Millennium Ecosystem Assessment (2005), United Nations (2002).

<sup>2</sup> Other principles of the strategic public management in NSDSs (e.g. horizontal integration, public participation) are much better covered in policy analysis and research (e.g. Zwirner & Berger, 2008; Steurer & Martinuzzi, 2005; Bass, 1995).

<sup>3</sup> The main selection criteria, based on the initial overview of NSDSs in the EU Member States, were: (i) different types of sub-national involvement, (ii) different political-administrative systems, (iii) different sizes of the Member States and (iv) a mix between 'old' and 'new' Member States.

<sup>4</sup> These countries are: Finland (Government Programme for Sustainable Development, 1998), Ireland (National SD Strategy, 1997), Luxembourg (National Plan on SD, 1999), Romania (National SD Strategy, 1999) and the UK (first National SD Strategy, 1994).

<sup>5</sup> The EU Member States selected for in-depth case studies on sub-national involvement in NSDS processes are: Austria, Czech Republic, Denmark, Finland, France, Germany, Italy, Malta, Slovenia, Spain and the UK.

<sup>6</sup> These Member States are Austria, Belgium, Czech Republic, Finland, France, Germany, Greece, Italy, Latvia, Luxembourg, Malta, Portugal, Slovakia and Slovenia.

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