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using science to create a better place

Understanding Special Interest Groups

Science Report – SC020067

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It's our job to make sure that air, land and water are looked after by everyone in today's society, so that tomorrow's generations inherit a cleaner, healthier world.

Our work includes tackling flooding and pollution incidents, reducing industry's impacts on the environment, cleaning up rivers, coastal waters and contaminated land, and improving wildlife habitats.

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Science at the Environment Agency

Science underpins the work of the Environment Agency. It provides an up-to-date understanding of the world about us and helps us to develop monitoring tools and techniques to manage our environment as efficiently and effectively as possible.

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The science programme focuses on five main areas of activity:

- **Setting the agenda**, by identifying where strategic science can inform our evidence-based policies, advisory and regulatory roles;
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- **Carrying out science**, by undertaking research – either by contracting it out to research organisations and consultancies or by doing it ourselves;
- **Delivering information, advice, tools and techniques**, by making appropriate products available to our policy and operations staff.



Steve Killeen

Head of Science

Executive summary

This report describes research carried out over two years (2002 – 2004) on relationships between the Environment Agency and special interest groups, a term used here to describe non-governmental non-profit-making groups with a special interest in areas or issues in which the Environment Agency is involved. The report is aimed primarily at staff who work with special interest groups at the local or national level.

A statutory objective of the Environment Agency is to develop close and responsive relationships with stakeholders. Much communication and contact with non-institutional stakeholders is with special interest groups. When relationships with these groups become polarised, interactions can absorb significant resources and cause considerable stress to staff. This report therefore seeks to understand the characteristics and roles of special interest groups and their relationships with the wider community and to identify principles and practices that will enable staff to engage with them more effectively.

The research process involved a series of semi-structured interviews with both Environment Agency staff and with representatives of special interest groups. The themes that emerged from these interviews were discussed at a series of five internal workshops. This enabled a wide range of staff to provide feedback on the results of the research as it developed and ensured that the emerging themes were relevant to the organisation's practice.

The report explores some of the ways in which special interest groups understand the Environment Agency. It outlines six main areas in which the special interest group's trust can be undermined. These are set within the broader context of declining trust in authorities and cover:

- perception of a lack of coherence and consistency in the Environment Agency's remit;
- perceptions of the degree of power that the Environment Agency has to influence policy;
- differences between special interest group and Environment Agency values;
- the limits to interpersonal trust;
- perceptions of the Environment Agency's relationships with industry; and
- belief that internal fractures can undermine activities.

The research shows that while the Environment Agency needs to communicate well with special interest groups, this may not be sufficient for good relationships. Special interest groups are communicating and networking with each other in new ways and the implications of this need to be understood.

There are a number of barriers to staff developing better relationships with special interest groups:

- special interest groups may be seen as not representative of the broader public;
- the scientific expertise of special interest groups may be questioned; and
- special interest groups may be seen as NIMBY ('Not In My Back Yard')

Given these perceptions on the part of both the Environment Agency and the special interest groups, it is important that the Environment Agency should plan engagement initiatives, and ensure the Environment Agency is visible from early on, understands stakeholders, talks and listens to special interest groups, and is open and honest.

The report concludes that the capacity of local staff to both plan and respond appropriately for engagement with special interest groups could be increased by creating a national database documenting engagement and providing expertise to assist local staff with diagnoses of local issues.

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1 Introduction

1.1 Purpose of the research

One of the Environment Agency's statutory objectives is to develop 'close and responsive relationships' with its stakeholders. Much of the Environment Agency's communication and contact with non-institutional stakeholders is with special interest groups (Barnett *et al.*, 2003). When relationships with these groups become polarised, interactions can absorb significant resources and cause considerable stress to staff. The Environment Agency wished to learn from the situations where their staff have achieved positive results and from expert understandings of special interest group activities.

This research and development project was commissioned by the Environment Agency to:

- gain a clearer understanding of the characteristics and roles of special interest groups and their relationships with the wider community;
- assist staff in identifying principles and practices that will enable them to engage with special interest groups more effectively, that is to develop closer and more responsive relationships.

1.2 Outline of research methodology

The project involved the following stages:

- a literature review exploring the way in which special interest groups might most usefully be classified¹ (Environment Agency, 2002).
- ten in-depth semi-structured interviews with Environment Agency staff (building on a series
- of short pilot interviews).
- eleven in-depth semi-structured interviews with representatives of both national and local special interest groups; and

¹ The literature review carried out at the beginning of this research suggested that developing a typology of special interest groups was likely to be of limited use. Existing processes (such as networking between groups) make classification systems redundant and uninformative in guiding action. Nor do such typologies take into account how the context in which a special interest group is active directs their activities. Classification systems provide broad rules of thumb. For example, this report refers to 'local' or 'national' special interest groups. Such classifications have a heuristic value in aligning the discussion but much more detailed analysis is necessary to be useful to staff.

- a series of five workshops with staff. These provided an opportunity for staff to share their experience of engaging with special interest groups and to examine their own, perhaps unarticulated, assumptions about the characteristics of special interest groups with whom they come into contact. The research team sought feedback on their findings at each stage of the research programme in order to maximise its relevance. In total, over 100 members of staff attended the workshops.

The people taking part in the interviews and attending the workshops do not represent either the entire Environment Agency or all special interest groups. The aim of this qualitative research has been to explore in some detail a range of views held about special interest groups and the Environment Agency and the relationships that exist between them.

Many of the recommendations in this report may be applicable to stakeholders other than special interest groups. The focus of this research, however, has been upon the relationships between special interest groups and the Environment Agency. Recommendations are made on this basis.

1.3 Report structure

This report contains seven substantive chapters covering:

- the background to the research programme and broad issues that emerged from it;
- how special interest groups see the Environment Agency and the reasons why the organisation's legitimacy may become undermined in the eyes of special interest groups;
- the role of communication in engaging with special interest groups and how this can be improved;
- the importance of the representativeness of special interest groups for the Environment Agency;
- science and expertise and the extent to which the expertise of special interest groups determines the credibility afforded to them;
- NIMBYism in special interest groups: reality and perception; and
- significant areas in the lifecycle of engaging with special interest groups, from engagement to disengagement.

The final chapter considers the resources needed to improve engagement with special interest groups and presents the main recommendations from this research.

2 Special Interest Groups: dilemmas for engagement

There is within the Agency a sort of 'what a bunch of nutters' view, I mean that's still there...particularly among officers who've [been] under a lot of pressure and get hassled a lot. There are also other people who want them dealt with in a managerial way, you know, try to minimise the resources we have to devote. It's an issue to be dealt with as a management thing. I know there are some pressure groups with whom many people in the [Environment] Agency have a lot of sympathy.

(Environment Agency Interviewee #3)

The Environment Agency is charged with building 'close and responsive relationships' with the public, local authorities and other representatives of local communities, and regulated organisations (Department of the Environment *et al.*, 1996). This is part of a more general government requirement for public bodies to modernise the way in which they operate, that is to increase openness and widen consultation and participation in decision-making. The Royal Commission on Environmental Pollution (RCEP) similarly draws attention to the requirement to develop 'more direct methods to ensure that people's values, along with lay knowledge and understanding, are articulated and taken into account alongside technical and scientific considerations' (RCEP, 1998). This in turn is in line with the Aarhus Convention which involves a commitment to 'access to information, participation in decision-making, and access to justice on environmental matters' (United Nations, 1998).

The Environment Agency has certainly responded to these drivers for developing close and responsive relationships. The growing literature in relation to the benefits of public participation processes (Petts and Leach, 2000) and how relationships should be developed with stakeholders (Christie and Jarvis, 2001) bears witness to this.

However, special interest groups often resist working within the remit of managed public participation events. They may seek to influence by rejecting the adequacy of such structures when they are provided by public agencies and it has been the experience of Environment Agency staff that it can be difficult to simply interact with special interest groups within *ad hoc* event-based participation processes. Greater understanding of special interest groups should result in a clearer picture of their strengths, of how relationships might be further improved, of the barriers to better relationships, and of those situations where it may not be productive for the Environment Agency to continue interacting with them.

2.1 Engaging with special interest groups: resource dilemmas

Many Environment Agency staff, and certainly many outside the organisation, would wish to see the Environment Agency broadening the range of its interlocutors and expanding its role beyond simple regulation. This would of course imply an increase in expenditure on activities that are not strictly and narrowly related to regulation. There appears to be a consensus among senior staff that the organisation's budget is limited and is unlikely to be significantly increased in the immediate future. In this context of budgetary restraint, managers' concern to optimise spending on interaction with special interest groups is understandable. However, there is a risk that by making savings on short-term, readily quantifiable costs (money, staff time) the organisation could face increases in less easily quantifiable, longer-term costs because of damage to its reputation, legitimacy, and goodwill. Yet it is precisely these less quantifiable resources that are likely to be increasingly crucial to the Environment Agency's continuing claim on public funds. By the same token it is arguable that there will be unacceptable longer term costs for the organisation associated with *not* considering its remit for building relationships with special interest groups in these broader terms (Bell and Gray, 2002).

2.2 Dilemmas around engaging with special interest groups

2.2.1 Contentious vs. non-contentious issues

There is arguably less scope for constructive relationships to be built where issues are more contentious. The interviews suggested that by and large interactions with special interest groups were less problematic in situations (such as flooding) that had a local history and where the Environment Agency had both created and taken advantage of opportunities to build relationships within the locality. There is, nevertheless, some evidence from the interviews that acceptable working relationships can be established even in more contentious cases.

The research programme – and thus this report – has tended to focus upon smaller local interest groups. The reasons for this are essentially pragmatic. These groups tend to be more problematic for staff and frequently engage around health and other risk issues.

2.2.2 Organisational differences

The evidence of this research suggests that almost any local interest group affected by a proposal or activity may become problematic for the Environment Agency. At the local level everything tends to depend on a few individuals who are not constrained to consistency by bureaucratic organisation. Therein lies the difficulty: the Environment Agency is a bureaucratic organisation, necessarily bound by rules and staffed by more or less permanent, full-time professionals. Local interest groups have a different logic of organisation. The interaction between the two is inevitably uncomfortable for the

Environment Agency. Bureaucratic organisations characteristically prefer to deal with a single representative or group able to speak authoritatively on behalf of a whole class of actors, using technical language based on measurable criteria and with interests which can provide a basis for negotiations. This is sometimes difficult to obtain at national level and even more difficult at local level.

Because special interest groups that are smaller and less bureaucratic find it relatively easy to change direction, they are likely to appear less consistent than larger groups. Smaller groups are particularly susceptible to change when key members join or leave, or certain types of resources are acquired or lost. However, *all* special interest groups – not just the smaller, *ad hoc* ones - can exhibit changes of focus over time. Organisations such as the Royal Society for the Protection of Birds (RSPB) may seem large when compared to local groups, but they are still relatively small and fleet-of-foot compared to the Environment Agency. Neither organisation is bureaucratically constrained to consistency in the same way as the Environment Agency.

2.2.3 Clashing cultures

Some staff believe that engaging with special interest groups is an integral part of their job. Others consider this gets in the way of their 'real work'; their primary task resides in their scientific and technical expertise, and the requirement to consult is a much more peripheral role. This can result in some special interest groups being afforded very good engagement opportunities, while others get little response. This clash of cultures within the organisation was evident both in the interviews and the workshops. Arguably a key challenge is to foster a culture of *wanting* to engage with special interest groups and other stakeholders. Currently, even those staff who recognise the need to engage with special interest groups can be put off by their own or others' bad experiences. Certainly the workshops illustrated that some individual representatives of special interest groups that had been difficult for the organisation to relate to had acquired legendary status. It is also important to consider the way in which institutional structures might militate against developing relationships with interest groups, for example by asking to what extent performance indicators account for the value of this engagement.

2.3 Initial understandings

It is clear from the data collected that there is much positive work by staff with local special interest groups and individuals which may on occasions have helped prevent a contentious case developing into a more polarised conflict.

We recognise that there are some special interest groups that the Environment Agency is not able to work with. Such groups may, for example, consistently work against the organisation. We explore the practical implications of this in relation to the importance of understanding when and how to *disengage* from relationships with interest groups.

Some of the findings of this research are not new. However, they may be particularly important in understanding the way in which special interest groups operate. For

example, the Environment Agency seeks to communicate clearly to all its stakeholders. However, understanding the way in which small local interest groups work highlights the possibly critical erosion of trust that may occur if such communication does not happen early on.

3. How special interest groups see the Environment Agency

3.1 Introduction

This chapter explores some of the ways in which special interest groups understand the Environment Agency. It outlines some of the grounds upon which the legitimacy of the Environment Agency is undermined in the eyes of these groups and what causes trust to be eroded.

On some occasions the Environment Agency may not be able to avoid having its legitimacy questioned. As the Environment Agency implements policy within boundaries set by government, some special interest groups may challenge the interests it represents. Radical environmentalists may view it as acting politically to defend an inadequate system of environmental protection (Carter, 2001). On other occasions there may be steps that the Environment Agency can take to change the way in which it is seen by special interest groups. For example, misunderstandings may occur when people believe the Environment Agency's remit to be broader than it actually is. To some extent the Environment Agency might address this problem by outlining the areas of its responsibility at an early stage.

3.2 Staff views of how the Environment Agency is perceived by special interest groups

As a general rule, staff felt that the larger national interest groups accorded greater legitimacy to the Environment Agency than the smaller local groups. Certainly some staff felt that small local groups, especially those involved in contentious issues, considered the Environment Agency to be less credible as a regulator. They suggested that these groups may explicitly intend to undermine the Environment Agency's legitimacy (e.g. by skilled use of the media by even novice groups).

Part of the reason why (an issue) has become contentious is because the stereotype of the [Environment] Agency by the interest group is that they don't have any control over the process of regulation, they think the regulation is unfair, the [Environment] Agency isn't trustworthy, it is not competent, and it isn't responding to public concerns.

(Environment Agency Interviewee #6)

Feedback from many staff suggested that they are keen for the Environment Agency to be perceived as a trustworthy and helpful organisation. Staff experience frustration when they perceive that their efforts are misinterpreted, not understood, or not appreciated.

...I think what the [Environment] Agency worries about is...public trust. If they feel confident that they've got public trust then its much easier to deal with special interest groups – I don't mean in the sense of dismissing them, but in the sense of be more confident with them...and I think the [Environment] Agency's a bit lacking in self-confidence. (I'm) not entirely sure it has got public trust, but the main reason for that is most of the public don't know we exist or what we do.

(Environment Agency Interviewee #3)

3.3 Decline of trust in authorities

One of the most important concepts to consider in examining special interest group perceptions is that of trust. For the Environment Agency to be considered a legitimate regulatory body it must, to some extent at least, be trusted. In recent years there has been a general decline in trust in authorities. It is important that staff consider the extent to which they represent a trusted organisation within this context.

Table 1 Trust in institutions to provide correct information about causes of pollution (Park *et al.*, 2000)

	Levels of Trust			
		A great deal/quite a lot	Some	Not much/hardly any
Universities	%	64	25	5
Environmental Groups	%	54	31	9
Radio or TV Programmes	%	28	45	21
Newspapers	%	14	39	41
Government Departments	%	13	47	33
Business and Industry	%	6	32	55

On the whole staff did have a clear appreciation that the way people perceived the Environment Agency was not just influenced by its own activities but was affected by this broader context of distrust. Distrust of government in general was seen as a problem for the Environment Agency's reputation and the context in which it has to act. But it was also noted that previous mistakes or 'scientific errors' by the Environment Agency or other parts of government have had the additional effect of predisposing the public to question scientific credibility.

I mean I just look back to things like the BSE crisis or something like that, where some scientist telling you ... 'oh it's fine, everything's OK', and then it turns out it's not OK and I ... think the public – because of all the things that have happened - are now very sceptical, and you know we might say 'well everything's fine coming from this waste

disposal...this landfill ...chemical company or this nuclear power station', and ...I think people then are just automatically sceptical and will go with more of a sceptical view.

(Environment Agency Interviewee #5)

3.4 Understanding of Environment Agency role and remit

Staff believed that the Environment Agency's remit was one source of distrust on the part of special interest groups.

Combining many regulatory bodies into one has had the effect of giving the Environment Agency a varied, and not always clear, remit. Whilst it has become the regulatory body for many environmental issues, a number are still the domain of others (e.g. it is not responsible for air pollution from vehicles, disposal of sewage, or rights of way). Other more subtle nuances in its remit can also cause confusion: at the time of writing the Environment Agency is responsible for rivers, but not for coastal protection, canals or drinking water. Successive re-organisations, changes in the regulatory environment and the changing requirements of legislation may understandably leave many people unclear about the extent of the Environment Agency's role and remit.

Exacerbating this perceived lack of consistency in the Environment Agency's remit, is the fact that different functions often have – necessarily – different regulatory styles. That is, some functions may perform primarily a monitoring role, whilst others may be more concerned with education, the law, or public relations. Over and above this variation between functions, are the Environment Agency's commitments to both 'sustainable development' and 'protecting the environment'.

The government's conception of 'sustainable development' incorporates four elements: social progress; environmental protection; prudent use of natural resources; and economic growth and employment. For the Environment Agency there is often tension between its 'sustainable development' and 'protecting the environment' mandates (Bell and Gray, 2002). For example, licensing a new chemical works may not be considered by special interest groups to be 'protecting the environment', but the area may as a result experience economic growth and an increase in job opportunities – both aspects of 'sustainable development'. Again, different Environment Agency functions may prioritise one or the other at different times – or even different aspects of 'sustainable development' – and with very good case-specific reasons. However, to the outside observer, this may contribute to the sense that it lacks coherence and consistency.

Some staff acknowledged that it was difficult for special interest groups to understand the constraints that the Environment Agency's remit imposed and that often it did not make intuitive sense. Other staff felt that special interest groups made little attempt to appreciate the way in which the Environment Agency is required to work and cited the fact that these groups continued to raise issues outside its remit as evidence.

I think that's where clashes can occur. They aren't able or they don't want to appreciate our wider responsibilities, and we feel sometimes irritated that they're only focusing on one small part.

(Environment Agency Interviewee #3)

It was also suggested that the way in which special interest groups misunderstood the institution's remit could result from them having a narrow range of interests. This was seen as in contrast to the Environment Agency which, it was generally implied, is objective, a kind of neutral referee.

It is perhaps unsurprising that when the Environment Agency refuses to take a view on an environmental issue, even if it is outside the institutional remit, it is at best frustrating to those who are publicly campaigning about that issue. This can affect Environment Agency's reputation, and can also be exploited by special interest groups.

Staff suggested that special interest groups expect too much and do not recognise the limits of what the Environment Agency can do, but also argued that these groups had too narrow an understanding of its role, or mistakenly considered the Environment Agency to be irrelevant to a particular issue.

3.5 Power of the Environment Agency

Special interest groups may also misunderstand the Environment Agency's ability to influence policy. Staff commented that groups often overestimate the extent to which it determines policy. That is, special interest groups often fail to grasp the fact that the Environment Agency mainly *implements* policy, rather than creates it. Much environmental policy comes from the European Union (EU), but interest groups will often take their grievances to the Environment Agency or to local authorities, rather than to Brussels or to the UK government whose representative sits on the European Council. Certainly, research suggests that British special interest groups tend to target their lobbying activities more on the basis of habit and familiarity than on a strategic assessment of where they will be most effective (Roose, 2003a,b). Larger national interest groups are much more likely to be *au fait* with European environmental policymaking, but even they do not seem to devote as much attention to lobbying the EU as might be expected, considering its potential influence (Rucht, 2001).

For the smaller special interest groups, the Environment Agency was seen as powerful insofar as it had the ability to block the actions that the special interest groups wanted (or facilitate an action that they didn't want). At another level Environment Agency's powers were limited, as it was seen as not being able to act in support of the environment and only able to act in ways agreed by other government organisations. In this way, the smaller special interest groups were dismissive of the Environment Agency having any real powers. Where representatives of smaller groups had a clearer appreciation of its position, this seemed to stem from a personal awareness from their own working lives of the way in which bureaucratic organisations operate.

Larger interest groups' perception of the Environment Agency's role, remit and powers more closely accord with the views of staff. Of course, the organisational structure and dilemmas of larger special interest groups are in some ways similar to the Environment Agency; interviewees from larger groups tended to see the Environment Agency as an important player hampered by the limited scope of its powers.

We are sympathetic about what they are trying to achieve but we don't think that they have the full, the kind of like political clout or the economic clout to really be able to do an effective job...

(Friends of the Earth - Local)

Because they can be involved but they can be ignored and if it is the repository of environmental genius in government which effectively it is, it is pointless having them there unless they are really going to be listened to.

(Friends of the Earth - National)

3.6 Different values

There was considerable evidence that the smaller special interest groups believed that the aims and underlying values of the Environment Agency were very different to their own.

Both of the small local anti-incinerator and landfill groups believed that the Environment Agency was driven by cost considerations rather than the principle of Best Available Technology (BAT). Smaller interest groups were not always aware that the assessment of BAT includes cost as well as technical feasibility. These groups did not feel that the Environment Agency offered them any reassurance that companies who are distrusted and operating risky technologies will not be allowed to pollute. They want evidence from the Environment Agency that this will not be allowed to happen. This evidence would be provided by, for example, demanding filters on chimneys or better monitoring equipment.

...at the end of the day if you give me the filters I'll bugger off, I'll leave this whole thing alone, it's all about filters and to me without a shadow of a doubt, the moment the company are paid to take these waste streams that should automatically, automatically trigger that deliverance. Not a programme to be thought about in... I mean we've had two years of a trial, two years since so that's four years and nothing's been done, the actual improvement programme is about another year away so it's going to be about 5 years that they've been burning this crap with no additional filters for the people in this area and that is well out of order as far as I'm concerned.

(The Air That We Breathe, local environmental group)

Although this was not the only small interest group that expressed such an opinion in the interviews, Environment Agency staff may question whether these groups really would settle for compromises of this kind. Of course this is hard to judge but there are

instances in other countries of negotiated solutions between special interest groups and regulators based on the reassurance provided by better monitoring and cleaner technology (Fischer, 2000).

One of the national special interest groups referred to another perceived difference between their values and those of the Environment Agency. The Environment Agency is seen as being largely focused on industry and technical issues of compliance; Friends of the Earth is concerned with environmental justice and community participation. Another difference of emphasis for Friends of the Earth is that they were increasingly aware of the potential effect of synergies and combinations of pollutants. They felt that these issues were of less interest to the Environment Agency.

The Environment Agency was commended by some special interest groups who considered that there was evidence of the Environment Agency's practice being informed by changing values, for example, in its grasp of the bigger picture. The larger national interest groups noted that there was generally a more holistic, rather than piecemeal, approach to issues now. For example, in relation to flood control and estuary management, groups addressing habitat loss had their concerns taken seriously and a common approach to biodiversity conservation and sustainability was emerging. A wildlife conservation group noted that the Environment Agency was slowly becoming aware of broader interests and how issues are linked. A large national special interest group that was learning to work with social justice issues noted that the Environment Agency was just beginning to think about these, and other non-technical dimensions of issues.

3.7 Interpersonal trust is not enough

In the interviews with local special interest groups that had been involved in contentious issues with the Environment Agency it was clear (as Environment Agency staff are fully aware) that once trust is lost it is very difficult to regain. It was also clear that for the small local groups, there were two levels of trust: trust in individual officers and trust in the organisation itself. Often individual officers with whom communities had day to day interaction *were* trusted insofar they were almost invariably seen as nice people just doing their jobs and that they were genuine and trustworthy. Special interest groups were positive about the interactions they had with officers at a local level and provided many examples of their helpfulness and responsiveness to requests. A clear distinction was made between local officers and those higher in the organisation.

On the whole most of the people I have dealt with are pretty decent. I do feel that the higher up the food chain you go the morals go out the window. You can quote me on that, I do feel that.

(Parents Against Incinerators)

This view of higher levels of the Environment Agency was fuelled both by lack of contact and by negative experiences of contact where it did occur.

Where special interest groups feel that promises have been made and broken, this often proves to be critical in the formation of negative attitudes. In relation to the Crymlyn Burrows incinerator, the special interest group perspective is that promises by public agencies to install continuous monitoring equipment were broken. The interest group had ostensibly accepted that the incinerator once built could not be knocked down, and then felt betrayed by a decision to not install what they believed to be the best available monitoring equipment. The Environment Agency's perspective on these events is different. However, in the interviews with the most active local interest group, broken promises were cited as a reason for distrust. The interviews with smaller interest groups concerned with incineration issues clearly suggested that, in part, they viewed themselves as civil society monitors of, what they considered to be a secretive and largely unaccountable alliance of the company, the Environment Agency and – on occasions – the local authority.

Although distance breeds suspicion and familiarity breeds trust, there was no clear sense, from the perspective of special interest groups, that contact with staff at lower levels could overcome the shortcomings perceived to exist higher in the organisation. It seems that trust in staff at the front line is not simply transferred or imputed to the organisation as a whole. Making information available and being open seems more often to lead to the Environment Agency being regarded as trustworthy. Staff too recognised dilemmas vis-à-vis the messages that were given at different levels of the organisation. They feel that good work done on the ground building relationships with special interest groups can be undermined by responses from staff higher up the organisation who are not fully aware of the situation. This can lead to delayed decisions and perceived contradictions that cut across the long term relationship-building in which local staff are often involved.

3.8 Understanding relationships with industry

The relationship that smaller local interest groups perceive to exist between the Environment Agency and industry undermines their trust in the Environment Agency. What they believe to be a cosy and collusive relationship is seen as evidence that it is not doing enough to protect the environment.

The core problem for small local groups that have been involved in conflict with the Environment Agency was that its relationship with industry was perceived to be inappropriate and close. The perceived injustice of this continued to motivate interest groups' activity after months and years.

I think the [Environment] Agency should not be so proud of their working relationship with industry; I think they should be seen as the environmental policeman.

(The Air That We Breathe)

Although it was the smaller local interest groups campaigning on contentious issues that were most vehement in these claims, a national group with which the Environment

Agency has greater partnership and collaboration also mentioned the problematic nature of its relationship with industry. Representatives argued that although the Environment Agency is tougher on industry than it used to be, and more prepared to upset government, it should be tougher still. The Environment Agency was seen to side with industry too often, especially around waste issues.

Representatives of the small local groups also drew conclusions about the Environment Agency's lack of independence from industry on the basis of what were considered to be inappropriate patterns of interpersonal relationships. One of them referred to the way in which the Environment Agency and industry staff all know each other and sit together and talk at meetings. This was perceived to be inappropriate and to have the effect of excluding others.

In many ways it is understandable that smaller groups perceive an industry / Environment Agency alliance from which they are excluded and to which they are extraneous. Clearly, staff cannot help 'knowing' industry managers and employees; it would however, not seem unreasonable that they look for ways of demonstrating their independence. Staff need to find ways of being seen to be as happy to work with the public – including special interest groups – as with industry and demonstrating that working with industry does not necessarily involve inappropriate relationships. It is vital that the Environment Agency should address this issue – arguably it will need to invest more in public education and liaison in order to do so.

Perhaps one of the ways that the Environment Agency could do this would be to make corporate contacts understand that engaging special interest groups is part of the Environment Agency's core business activity. It is interesting that some staff identified the main problem as not wanting to be over-friendly with special interest groups. This seemed much less of an issue with regard to larger national groups. Although the national special interest groups were, as noted above, not uncritical of Environment Agency practice towards industry, they tended to be on a more equal footing in their relationships with staff. The interviews provided an interesting contrast between the perspective of a national professional officer and that of self-educated grassroots campaigners. The former is on first name terms with leadership; the latter is suspicious of remote Environment Agency elites.

The distrust of the Environment Agency because it is seen to be working closely with industry is arguably the inescapable downside of the 'compliance by consent' (as opposed to strict regulation) regime generally adopted in the UK (unlike, say, Germany). Its efforts to persuade industry by working with them to achieve BPEO (Best Practicable Environmental Option) are easily misperceived by outsiders as collusion. The Environment Agency is pragmatic about this:

It's better to persuade industry / developers to build voluntary compliance in from the beginning because we don't have the resources to police every operator...No amount of inspection is as good as a conscientious operator using proper equipment properly maintained, because the site operator is there all the time. PPC regulations require self-monitoring and we would monitor the quality of self-monitoring.

(Dr D. Johnson, in evidence to Kent County Council Technical Panel meeting re Solid Waste and Energy Recovery Facility (SWERF), County Hall, Maidstone 21 July 2003)

However, this doesn't persuade those people who think the Environment Agency should have more resources and insist on strict compliance with higher standards. There is a fundamental problem of divergent perspectives, which are in part a function of the UK regulatory regime.

R ...everything that we have said has been documented, and in 10, 20 years time the people responsible cannot turn around and say we didn't know because we have furnished them with all this information. So they will never ever be able to turn around and say we didn't know that people were dangerous, or we did not know that the company was a bunch of cowboys.

I Because you told them?

R It is on the public register, we have had receipts for our information, the Environment Agency can't turn around.... every thing that we have given them, every single bit of dirt we have given them, every bit of research, we have receipts for, and they will never be able to turn around and say they didn't know...

(Parents Against Incinerators)

3.9 Internal fractures

Some special interest groups perceived Environment Agency activities to be undermined by internal fractures – especially between higher and lower levels of the organisation. Staff too often noted that this was an issue although they cited different evidence for this, such as lack of support for officers on the ground or actions by senior staff coming in late in the day, undermining the previous work of staff on the ground.

I think there sometimes is a resentment from some junior officers...that senior management seem to... – how shall I put it – suck up to these groups, and then walk away leaving all the following work to the junior officers, and that's part of the... the complex situation we get into.

(Environment Agency Interviewee #3)

Where special interest groups did criticise individual officers, this was almost invariably seen as a function of the organisational constraints under which they work, as they were felt to be constrained by middle management, leaving officers on the ground little leeway for individual discretion.

Special interest groups also noted the way in which the Environment Agency's origins could still be seen. The staff that came from the National Rivers Authority were seen as being good at talking to communities, whilst staff who came from the former Pollution Inspectorate preferred talking to industry who understood the technical language they more naturally used. One national special interest group commented that different parts were easier or harder to work with depending on their history of interest in conservation matters but that the trend was that all areas were becoming more amenable.

The interaction between the culture of the organisation and the attitudes of individual officers was also highlighted. For example, the 'old school' of officers who strongly prioritised technical factors and were unwilling or fearful to engage with processes of organisational change were contrasted with individuals with aspirations to engage with these processes and bring about change. Long-standing staff may see a change of role as inconvenient and unwanted, rather than as a challenge and / or progress. One of the clearest things to come out of the workshops and the interviews with staff was that many people are unsure of their exact role when it comes to matters of engagement and consultation. To some extent, there is an internal 'clash of cultures', between the more technically minded individuals, and those who feel that more consideration should be given to the social aspects of their jobs. This has created a situation where some staff believe that engaging with special interest groups (for example) is absolutely part of their job – that consultation and communication is a central task. Meanwhile, other staff consider this kind of social interaction to get in the way of their 'real work' – that the primary task involves their scientific and technical expertise, and consulting is a much more peripheral role. This can result in some groups being afforded very good engagement opportunities, but others finding the Environment Agency very unresponsive. Of course, it is precisely this kind of uncertainty and inconsistency that undermines its perceived competence and legitimacy.

The interviews with special interest group representatives provided many examples of why the Environment Agency was seen as a slow and cumbersome organisation; for example, it was slow to provide information or to put information in the public domain, or that people did not know who to contact and could be passed from department to department. In the following quote the interviewee clearly values the responsiveness of some parts of the Environment Agency.

I think that on the Humber Estuary that is one of the major things that has changed they will then pick up your concerns and they will then talk to you about it and they will involve you trying to find a solution. That is where the Environment Agency has got to now on the Humber, which I think is fantastic. On the rivers they are still stuck in the old ways, ask us for a report and then for one reason or another they don't believe they can do that, so we hear no more or get a very defensive report, and so if more could move towards the way that we work with the [Environment] Agency on the Humber Estuary I think that would be fantastic.

(Royal Society for the Protection of Birds)

Some groups saw the organisation's unresponsiveness as partly a product of being risk averse; delaying decisions because of a fear of getting things wrong. Staff recognised this as a valid criticism on occasions and at the workshops some suggested that the organisation should learn to be less risk averse. This might involve giving more decision-making freedom to staff on the ground. The organisation must fulfil its obligations as a regulator and this may sometimes mean making decisions on the basis of the evidence available at the time, even if those decisions turn out later to be misjudged. If the Environment Agency is to be clearer about its remit, it may also benefit from being less risk averse about how it takes regulatory decisions.

3.10 Overview of implications

- Recognise that there is a widespread lack of trust and make this the starting point for engagement / communication strategies;
- Recognise the ways in which the values of special interest groups may differ from the Environment Agency's values and take account of this in planning engagement / communication strategies;
- Consider ways in which the Environment Agency can better communicate its role and remit;
- Recognise the importance of transparency and openness in information provision for generating trust;
- Develop ways of demonstrating that the Environment Agency is independent from industry; and
- Recognise the value of consistent responses from different levels of the organisation and consider ways in which senior staff could have more understanding of the relationships between interest groups and local staff.

4 Communication between the Environment Agency and special interest groups

4.1 Introduction

Communication can be both intentional and unintentional. Special interest groups may draw inferences about an Environment Agency position where no communication has been intended. It is important for the organisation to be sensitive to how and when this can occur. This chapter explores four dimensions of communication between the Environment Agency and special interest groups;

- characteristics of special interest group communication;
- special interest group communication with the Environment Agency;
- centrality of communication to staff; and
- networking between special interest groups.

Staff generally saw that there were potential negative effects of poor communication. For example, poor communication might diminish trust, or might have the effect of infuriating special interest groups and energising their activities.

The Environment Agency being firm with them and challenging their views – as long as it's done courteously – isn't really a problem. I think it's when they feel they're being ignored, or they're being fobbed off, or patronised... the group that's around Nant-y-Gwyddon – RANT – I think they've been largely energised in the past because not just the Environment Agency but a number of authorities have treated them with barely disguised contempt... and that's made them more determined to win their point... and in fact they're now sitting on top of the pile and the rest of us are looking fairly foolish.

(Environment Agency Interviewee #3)

The importance of poor communication in radicalising groups has been borne out by wider analysis of the factors most likely to trigger strong local opposition to developments (Doherty, 2002a).

Whilst acknowledging the value of good communication and realising the potentially deleterious effects of poor communication, staff need to acknowledge that this may not be sufficient to gain good working relationships with special interest groups and other stakeholders.

In the interviews, few staff acknowledged that external factors can limit the success of the organisation's communications or that there could be conflict between the Environment Agency and special interest groups quite independently of the quality of

its communication. For example, special interest groups will vary in how willing they are to talk to the Environment Agency. Most special interest groups tend to recognise the value of keeping open a plurality of strategies and of maintaining communication with those in positions of authority. Others, however, such as the informal environmental direct action networks (e.g. Earth First!) may feel that talking to the authorities or government could compromise them and lend legitimacy to projects or processes of which they are sharply critical. They may even fear losing public support if they are seen to be talking to the 'enemy'. Individuals from these networks are sometimes also involved in local special interest groups. This aspect of some special interest groups' identity and strategy is clearly beyond the control of the Environment Agency and relatively immune to better communication practices.

4.2 Characteristics of special interest group communication

Interviews with special interest group and Environment Agency personnel revealed a complex web of special interest group communications. There was also evidence that each of the parties often perceived the communication of the other differently than was intended.

Special interest groups often know a great deal about issues on which they are campaigning. This expertise may be in the form of scientific 'facts', local knowledge, first hand experience of the issue, or procedural knowledge. It is often a goal of the special interest group to convey the content or the import of this information to its members, to wider publics or to official bodies such as the Environment Agency.

Where it is their goal to convey relevant information to as many people as possible, special interest groups can be sophisticated and thoughtful in their use of the media and many protest strategies are designed to attract media interest (Wall, 1999). A thorough discussion of the relationship between interest groups and the news media is not the remit of this review (see, for example, Andersen, 1997; Hansen, 1994). It can be noted however that although there are important distinctions between national and local media, many news values such as providing 'infotainment' and focusing upon individual cases are well matched by the approaches of special interest groups (Breakwell and Barnett, 2001), which can be extremely skilled at using the media to their advantage. Greenpeace and other groups employ journalists and have their own media teams. Direct action groups frequently have their own web-based media, and even apparently novice local groups often include experienced campaigners who know how to write press releases and may have contacts in local press and radio. Furthermore, inexperienced groups can often draw on resource packs provided by coordinators of networks, which include briefings on media tactics. ALARM UK provided such support in the anti-roads movement, for example, and Friends of the Earth has provided advice and training to a range of campaigners, including those against roads and incinerators.

A further important strategy that special interest groups use in getting information across is to get key figures on side to enable messages to be associated with an attractive, powerful or credible source. Doherty (2002a) suggests that they may do this

by appealing to local authorities or the local member of parliament. Alternatively they may try recruiting local celebrities (North, 1998). Obviously having an association with a key figure helps the special interest group achieve goals other than disseminating information, such as gathering support in terms of manpower or finance or organising a wider audience for their concerns.

Special interest group communication was on occasions characterised by the Environment Agency staff as having an undue and inappropriate reliance on emotional appeal. Arguably though, 'opposition' is to some extent necessarily emotive. That is, opposition is usually, but not always, prompted by feeling threatened, and feeling threatened is usually linked to some kind of emotion – such as fear, outrage, hatred, loss of control, or even guilt (Jasper, 1997).

Such is their bias its almost impossible for them to be objective about this...and I think which is why I think the stakeholder group's more useful... not that the other stakeholders are any more objective, but you get a different range of subjectivities... that come into it. I said there are exceptions, we've come across people who were trained engineers, for instance, who were much more analytical and took good observations and things... and in some cases people will get so emotionally involved – particularly when... there's perceived health effects, or they've lost someone through a health effect... – then they're so emotionally involved it's difficult for them to be objective.

(Environment Agency Interviewee #3)

Outrage is often expressed by opponents to contentious issues. This can easily be exacerbated if people subjectively perceive responses to their outrage to be dismissive, patronising or otherwise inappropriate (Blood, 1996). Certainly the human interest focus of many special interest groups contrasts with the rather impersonal statements given by proponents of the initial position. Given that many local people may be relatively indifferent to environmental issues, such an approach can be a powerful mobilising factor – especially where people feel a strong attachment to the location that is apparently under threat.

Environment Agency staff's description of special interest groups as having an emotive stance in contrast to the organisation's preferred focus on scientific facts may contribute to framing the issue as a two-sided battle – proponents versus opponents. Disputes over environmental issues are, however, rarely so simple. Many issues involve interested parties with diverse views, which cannot be divided into 'for' and 'against' without difficulty.

The special interest groups that were interviewed were often at pains to stress that they should not come across as extreme and wished to emphasise the scientific – and thus credible – basis for their concerns. For some groups this manifested itself as encouraging informed discussion of the broader issues. Where there was a national organisation with smaller affiliated groups, the latter were also encouraged to appear credible, for example, to use less extreme language (although this did not always happen).

Some of our groups pick up literature from other, often local networks or groups, that use much more extreme language and run with that. On occasions we have had to say that we think that's inappropriate. One group began distributing a leaflet with a picture of a deformed baby on the front - produced by a group called Communities Against Toxics. And we just said, look that is just completely inappropriate a) it's wrong and b) it's just wrong style and tone in terms of campaigning. So there are those tensions, and the only way you deal with that is you just sit around a table and sometimes you just have to agree to disagree really.

(Friends of the Earth - National)

Special interest groups were aware of the importance of what was said in public; for one group the benchmark for this was whether something would be defensible at public inquiry. Smaller local interest groups were also keen to stress the importance of careful and accurate communication.

One thing we have always have done, and we all agreed on in the beginning is would never open our mouths unless we had the paper work to back up what we were saying. And so far not one of us has been issued with a.... Slander or libel or anything like that. Because we can back what we're saying. And that was something that was not bought up but something that we just generally agreed on. We would not get caught out on a lie...

(Parents Against Incinerators)

Special interest groups generally strive to articulate claims based upon evidence and, where possible, they appeal to science and scientific evidence. But they vary greatly in their ability to do so effectively or in terms the Environment Agency would accept. Some larger groups are relatively well resourced and may even, as in the case of Friends of the Earth or the RSPB, be able to commission their own research. Other local special interest groups, especially where they are not well networked with better resourced groups, may have a more erratic or partial command of scientific evidence and understanding of scientific issues. But there is no simple correspondence between the group's resources and the quality of the scientific evidence and arguments it deploys; some small, local interest groups are or become extraordinarily expert about the issues that concern them. The Environment Agency needs to be aware of the asymmetry of resources that exists between it and the special interest groups with which it interacts. The Environment Agency needs also to recognise that it does not have a monopoly of knowledge or expertise, and it should not assume that all interest groups are amateurs. Equally, however, the organisation must deal with people who do not always have the education, the training or the resources to articulate their arguments in ways it might reasonably expect of, say, an applicant for a PPC (Pollution Prevention and Control) licence.

4.3 Special interest group communication with the Environment Agency

The material collected in the literature review and the interviews suggests that special interest group communication is broadly geared to one of three main goals:

- inform (or persuade) the Environment Agency about things that it has overlooked, or not looked at from every angle or apparently got wrong;
- inform key people and organisations about the importance of an issue, in the hope that they can put pressure on the Environment Agency (and others) to take the kinds of actions the special interest group wants; and
- inform the general public about an issue, in the hope that support may grow for the special interest group and / or more people will challenge the authorities over the issue.

A local Friends of the Earth coordinator suggested that Environment Agency communication often underestimates how much interest groups know and understand about environmental issues. This in turn has implications for how the it is perceived by the groups. It was felt that staff can also be nervous about talking to communities face to face and tend to overuse statistics and diagrams on occasions. This was seen to be an inappropriate way of helping people understand complex issues and less effective than simply increasing human contact. Local special interest groups certainly have a preference for dealing with technically competent people and resent being fobbed off (as they see it) with presentations by managers or public relations people who may not fully understand the technical issues, even to the extent that some of the special interest groups' people do.

Environment Agency staff in the workshops noted the importance of pitching communication according to the target audience's level of expertise; however they did not find this easy to determine. Certainly better preparation would help. Part of this might usefully involve speaking to special interest group representatives about the most helpful ways of presenting the information.

4.4 Centrality of communication to Environment Agency staff

For the most part, staff saw shortcomings in the Environment Agency itself as being responsible for poor communication. For example in the pilot interviews – designed to provide an initial understanding of barriers to improved relationships with special interest groups – interviewees noted issues such as:

- Lack of a 'culture' / history of empathising and liasing with interest groups;
- Fear of not being in control;
- Lack of skill in empathising with interest groups;
- Irregular one-to-one contact; and
- Lack of clarity about purpose of interaction with special interest groups.

It was also the case that various characteristics of special interest groups were seen as being instrumental in causing communication problems with the Environment Agency:

- Special interest groups unwilling to accept any technical evidence that does not support the stance they have taken;
- Special interest groups able to change tack with little warning; and
- Special interest groups personnel change regularly, frequently and unpredictably.

Environment Agency staff were fully aware of the importance of clear communication with special interest groups – this was seen as a pre-requisite for informed decision-making and as being likely to facilitate good relationships. Not all staff though saw that communication was an important part of their job.

There was a range of opinions about how central the task of communicating with special interest groups should be. For some staff it *is* a central task. For others, their scientific and technical expertise is the clearest priority, with communication occupying a much more peripheral role. For these staff, special interest groups can be an unpredictable distraction from their professional routines, imposing costs in terms of time and money. Very few interviewees thought of their job simply in very narrow technical terms, although often the reasons for construing the job more broadly were explicitly utilitarian. That is, listening, consulting and engaging in discursive processes can help to get the job done better, more quickly, and at less cost.

For the most active members of the special interest groups, campaigning is not part of their job and has to be fitted round both work and domestic obligations. Sacrifices of income and status are made by core activists for whom campaigning becomes a way of life.

...the problem we do have...is special interest groups seem to have all the time in the world, but we haven't. We do get these long letters sometimes, long telephone calls...

(Environment Agency Interviewee #3)

Such comments reflect the asymmetry between the resources of the parties to the communication, but they reveal little understanding of or empathy with the interest groups.

4.4.1 Desired qualities of Environment Agency communication

Clear communication is equated with simple communication. It was recognised that to communicate in this way is not an easy task – it involves preparation, a good grasp of complexities and an ability to translate these into simple, straightforward language.

On the whole we try and be proactive, we try and set out the facts in as plain a language as possible, it isn't always easy and we're not always good at it but we have a really good try.

(Environment Agency Interviewee #8)

The importance of consistent communication across different parts of the Environment Agency and across different geographical locations was also noted. This assumed particular importance in the face of the alliances and networks that often underpin special interest group activity (see below). In such a situation it was seen as vital that different staff and offices were consistent in what they said, as otherwise this would offer an opportunity for the groups to gain some leverage.

There was general agreement on the value of face to face communication and that this could achieve more than written communication in many instances. Not all Environment Agency staff possess good communications skills, and these must be developed if staff are to respond to the social and interpersonal requirements of working with special interest groups.

I had a lot of letters to-ing and fro-ing, and at the end of the day when you actually see people and you chat to them, you can sort out a few things. You meant so-and-so, oh, right, okay.

(Environment Agency Interviewee #4)

4.5 Networking between special interest groups

At both local and national levels there are informal networks of mutual interest and experience that link environmental activists. These informal ties clearly provide a route to increased resources, knowledge and potential mobilisation. Moreover, the formal increase in resources and the informal networks across the environmental movement have increased its capacity to respond effectively to new opportunities.

The way in which alliances and networks form across special interest groups was recognised by all Environment Agency interviewees. This was associated with special interest groups developing greater power, with accessing and exchanging information more quickly (through the Internet), and learning new and effective strategies. It was also recognised that whilst doing all these things, it was generally important to individual groups to maintain their own identity.

4.5.1 How has networking come about?

Although there is a long history in England of local campaigns to protect environmental amenity in the face of pressures from economic development, environmental activism has only become relatively common since the early 1970s. After a brief period of activity, it was in the late 1980s that campaigning environmental groups such as Friends of the Earth and Greenpeace became mass organisations with over 100,000 paying members or supporters. Increased resources allowed them to undertake their own research and develop and disseminate their own expertise. The capacity of environmental groups has also been expanded at local and national level by activists with considerable experience of campaigns, and consequent knowledge of how best to pressure official agencies, write press releases, get good media coverage and so on. At a local level, the most committed activists usually stay involved in political activism of various kinds, even as pressure of work and family commitments reduces their free time (Doherty, 2002b).

Increasingly, the Internet is used to help forge and maintain links as well as providing an economical means of accessing and disseminating technical information (Pickerill, 2000). E-mail has given groups the ability to send out information to a large audience relatively cheaply and – importantly – virtually instantly. This is particularly useful if, for instance, a special interest group wishes to try and arrange some kind of protest action at very short notice. Meanwhile, the Internet has helped groups to find out about each other, and has given them access to more information (sometimes of debatable quality) about the issues that interest them. In other words, interest groups now have more people to talk to, and more to talk about.

4.5.2 How are networks formed?

Special interest groups engage in networking in a variety of ways, and for a variety of reasons. Many groups are linked to each other through personal contacts among their members, who may, for example, have previously protested together. Individuals who have been campaigning on environmental matters for a long time are likely to know – or at least know of – many other special interest groups, their key members, and their potential to be supportive on particular issues.

Studies of environmental protest (see Rootes, 2003) and the national network of environmental organisations in Britain (see Rootes and Miller, 2000) for example, have demonstrated the centrality of Friends of the Earth to environmental networks. Its national organisation and local groups have often served as key nodes for the development of local campaign networks on issues within the Environment Agency's remit. Local Green Party and Greenpeace support groups have sometimes played similar roles.

Nevertheless the most common uniting factor is issue. That is, special interest groups with similar opinions on a certain issue will often band together to campaign on that issue. Special interest groups can also be linked by the target of their protests (Doherty, 2002a). For example, groups with different concerns and agendas may work

together because they are all directing their protests at the same government department.

One reason special interest groups form links is to increase or pool resources. At the most basic level, this may be for financial purposes, or to enable the mobilisation of a larger number of people. Of course, resources come in other guises too. Rootes (1999a) suggests that larger interest groups can provide smaller groups with useful contacts and resources. Local groups have also formed networks through which they exchange briefing material and share experience. This type of information may be the main commodity exchanged when groups network (Ward and Lowe, 1998).

Special interest groups can also learn strategies from each other. For example, Wall (1999) reports that Earth First! learned techniques of non-violent direct action (NVDA) from various peace movements, and learned sabotage techniques from animal liberation militants.

Groups may also network for strategic aims. For instance, Jiménez (1999) suggests that special interest groups network with political and judicial bodies, if they wish to launch some kind of legal action. Similarly, Rucht (1999) says that alliances between special interest groups and moderate organisations may lead to the special interest group increasing its credibility in mainstream society, whilst the moderate group may be perceived to be in touch with events at the grass roots level. However, such associations can also lead to special interest groups being accused of 'selling out' to corporations or the state.

4.5.3 Who networks with whom?

Sometimes networks form between small local groups, each based in a different geographical area, which are concerned about a particular issue, such as incineration. Our interviews with special interest groups showed the value such contacts had for local groups, affording them information they felt they would not be able to obtain elsewhere. While Environment Agency staff expressed a concern that special interest group networks may be spreading misinformation, from local objectors' point of view other objector groups are going to be able to tell them the kind of things that (they think) the company and public officials won't. So, they are more likely to trust even anecdotal evidence from groups similar to themselves than, for example, technical risk assessments from the Environment Agency.

Small special interest groups are generally formed and operate independently of larger organisations, often initially around a local issue or special interest. Larger organisations do not have the resources to address many (if indeed any) specifically local issues, and tend to focus on a narrow range of broader themes. However, the activities of local special interest groups are often linked to these broad themes, as examples or symptoms of more global issues. Local branches of large formal organisations may predominantly be engaged in fund-raising activities or campaigns defined and authorised by the national office (Doherty, 2002a). Rootes (1999a) notes that where large environmental groups get involved at the local level, their 'professional' approach tends to work alongside the activity of local special interest groups, rather than replacing it. Members of local branches of groups such as Friends

of the Earth are often also involved in other local campaign groups and act as bridges to local activist networks. For example, in protests at Manchester Airport, direct action groups occupying the site worked closely with Manchester Friends of the Earth and used its city centre offices as a campaign headquarters.

In general, large environmental organisations seek to affect policy decisions by maintaining an open dialogue with policy-makers. To this end, they favour a 'professional' approach. That said, larger groups do not entirely distance themselves from the activities of smaller special interest groups. On the one hand, the activities of smaller local groups (such as the direct action groups) can make it easier for larger environmental organisations to push issues up the official agenda, and the contrast with radical groups may make the larger organisations appear more credible and reasonable. Talking to the large environmental organisations may appear an increasingly palatable option if the only alternative is dealing with smaller, less professional special interest groups (Rootes, 1999b; Plows, 1998).

Whilst special interest groups will often consciously *decide* which other groups or individuals they wish to network with, they may also chance upon more unexpected networking opportunities. For instance, networking opportunities may present themselves as the result of new coalitions and/or shifting alignments amongst more powerful actors, such as local politicians or businesses. An example of this occurred around the Newbury bypass conflict. Local business elites were divided over the bypass, resulting in business campaigns both for and against, and providing anti-bypass campaigners with some relatively prominent local allies. Similarly, special interest groups may sometimes also find that the local MP will lend support to their cause, and become an influential ally. MPs have an important role to play in influencing local public opinion. They may also be able to exert pressure upon the relevant minister particularly when the government is vulnerable.

4.5.4 Special interest group perspectives on networking

All the special interest groups interviewed reported having contacts, allies or networks of some description. However, there was a lot of variation among the groups with regard to the degree of formality, extensiveness and regularity of these contacts.

The smaller special interest groups tended to have links to other groups through personal contacts. These were either people that the interviewees already knew (friends, family, acquaintances), or were people that the interviewees had come to know through similar campaign interests.

...I am in contact at the moment with a group that are on the verge of getting an incinerator by the same company, so any nastiness I can find on this.... So hopefully it will help them to not have one in their area. They present this evidence to their council and say this is what is happening in South Wales, we really don't want it. That's how it works, and none of us charge one another for information.

(Parents Against Incinerators)

Meanwhile larger, national special interest groups tended to have comparatively formal links to their own regional groups and members, and also other – mostly environmental – national and regional organisations.

I feel they [the special interest group] work closely with other conservation organisations where we have common objectives, on planning cases and things like that on the Humber Estuary... (we) work very closely with the Wildlife Trust, English Nature is the government organisation. We discuss complex issues and look at what may be the best way to deal with them. We don't necessarily always take the same position because sometimes the actual position that we might take might be determined through discussion within our own organisation but we do pass information to each other and let each other know what our position is going to be and support each other on that basis.

(RSPB)

The larger special interest groups also reported having some links with smaller non-affiliated groups, and one of the national special interest groups was actively trying to develop networks of smaller groups.

Reasons for cultivating networks and contacts also differed between groups. The smaller special interest groups seemed to use networks primarily for exchanging information (in some instances, disseminating information about Environment Agency activity) and monitoring the campaigns of other, similar groups. Larger special interest groups seemed to use their networks more as barometers of opinion, and tools to aid mobilisation of their own local groups. Links to other organisations gives these special interest groups the opportunity to hear what their peers think about various issues, which is vital in assessing where more concrete alliances might form. Larger special interest groups also need to listen and keep track of important issues at the grass roots level, to maintain the trust and confidence of their local groups and members – i.e. 'we are listening and your views do matter to us'. Mobilisation of local groups is also made easier through these networks. Large special interest groups can co-ordinate fairly large campaigns through their local group networks, and operate in a manner that is extremely fluid and fast when compared to that of the Environment Agency.

4.5.5 Role of the Internet

Within small local special interest groups, views about the Internet as a medium varied. There was still evidence of much campaigning activity through word of mouth, personal contact, telephone calls and distributing 'hard copies' of material. There was an awareness of the need to involve group members who did not use the Internet. It was generally felt that the Internet came into its own and was invaluable for finding out about the science, and locating and communicating with other groups of people with similar concerns. It is thus increasingly the key to networking *between* groups. However, local networks themselves tend to grow out of personal contact and direct conversation.

The Internet obviously is a godsend to everyone, that is wonderful because you just click on incinerator and there is loads of stuff. Gradually you hear about what people have been through with their own ... facilities and what they have had to do to get things sorted out and tightened up and what have you. I am a technophobe so people tend to phone me and I phone various people, others contact people by the Internet. I would rather talk to people frankly.

(Parents Against Incinerators)

It seems that the Internet plays a key role in enabling networks to be maintained. These themes tie in with other evidence (e.g. from studies of the European Social Forum) that the Internet is indeed regarded as an invaluable source of information – about the issue and about other groups - but that personal contacts are still the main route to mobilisation.

4.5.6 Dealing with the downsides of networking

Environment Agency staff do not always see the development of links between special interest groups as beneficial or desirable. Some staff suggested that these networks make life more difficult for them.

I think if you pool resources I think you could p'raps be...well I suppose I'm being negative here, but the [Environment] Agency would think that it could be even more disruptive of our work if people actually link up... I think there probably are tactics involved to actually disrupt the processes of what we're trying to do... and I think it will get worse.

(Environment Agency Interviewee #1)

The synergy creates more of a threat to the [Environment] Agency's reputation and more of a drain on our resources than if we were dealing with them as isolated groups.

(Environment Agency Interviewee #6)

Any inconsistencies in the Environment Agency's position will become more visible when monitored by a network of special interest groups and they may be held up as examples of a lack of competence. Better and more communication between interest groups, means that discrepancies in Environment Agency practice across regions and functions – and perhaps over time as well – are more likely to be spotted.

Networking can also constitute a threat to special interest groups insofar as groups generally wish to preserve their own agendas and identities. Different groups will have different agendas, which will affect who they do or don't network with, and different strategies to preserve and manage their identity when involved in networking. This process has been noted by Environment Agency staff.

Each group will tend to maintain its independence... but they will use each other in the best way that they see fit... they will collect information together, they will use information that others have got but they will not be driven by any other group.

(Environment Agency Interviewee #6)

It is, however, important for the Environment Agency to consider ways in which networks and alliances between special interest groups may prove helpful. For example, they have the potential to disseminate information to a lot of people in a quick and inexpensive manner – and without the Environment Agency having to repeat information over and over again to very similar groups. Indeed, if the Agency identifies a few key ‘gatekeepers’, special interest group networks can be used to both give *and* receive information. For example, the National Flood Forum networks with a lot of local flood groups around the country, and also acts as a conduit for channelling information to and from the Environment Agency.

If the Environment Agency were to develop an effective system to make available information about its work on comparable cases, this information could be passed on to special interest groups. Dissemination would be aided by networking amongst groups. It may help them to understand the Environment Agency’s role and limitations, to have reasonable expectations of, and to see the Environment Agency as a possible partner rather than an antagonist. Knowledge of previous or parallel cases would thereby be spread to newcomers. Clearly this already happens to some extent – especially Friends of the Earth with respect to incinerators, and Campaign for the Protection of Rural England (CPRE) with respect to landfills. It would be in the Environment Agency’s interests to cultivate working relationships with campaign officers in those special interest groups.

Networking between special interest groups may also be a positive thing for the Environment Agency insofar as it helps to hold it to consistent standards. It spurs the Environment Agency to raise its game, and although this may be uncomfortable in the short term, it actually helps the Environment Agency accomplish its mission.

4.6 Overview of implications

- Consider early consultation with special interest groups (amongst others) about the best ways of talking to communities;
- Find out what the special interest groups dealt with understand about the issue before developing your own communications;
- Recognise the value of technical staff with strong verbal and face to face communications skills and explore the implications of this for staff training; and
- Consider the ways in which the development of special interest group networks can be beneficial for the Environment Agency.

5 Representativeness

5.1 Introduction

One of the main concerns of Environment Agency staff when considering how to engage with special interest groups is the extent to which these groups are representative of the general public. This chapter will document a range of views of staff on this topic, and evaluate the implications of these for the way in which the Environment Agency works with special interest groups.

The Environment Agency has no agreed policy on which stakeholders to engage with but in practice many staff feel that the degree to which stakeholders represent significant bodies of opinion is important.

It is important to explore the notion of how representative special interest groups are of broader publics, particularly as staff often use this as a way of justifying the extent of their engagement with groups.

The question of how representative special interest groups are of broader publics is relevant when it comes to selecting groups to take part in consultations. Should the Environment Agency seek the views of whole communities – containing disinterested publics or interested but silent publics as well as formal ‘stakeholders’ and special interest groups? How might it do this?

Arguing that special interest group views are not representative of the views of broader publics tends to imply that public (non-interest group) opinion is homogeneous. However a systematic assessment of public views is likely to uncover diversity and heterogeneity, and a range of potentially changeable and uncertain opinions on any particular issue.

In this chapter we discuss a number of views about representativeness. These are the views of Environment Agency staff and include the following:

- the more representative a special interest group is, the more attention should be paid to its opinions;
- engagement with special interest groups which have little relationship with the general public may be an inappropriate use of resources; and
- special interest group opinions may be valuable because of the quality / validity of the points being made and the power they have to impact Environment Agency activities.

In discussing these views, this chapter suggests the following are unclear:

- how special interest groups can be representative of the general public;
- how representativeness might be systematically assessed; and
- how valuable it would be to know how representative a special interest group is.

It is suggested that special interest groups make a valuable contribution independent of their degree of representativeness, e.g. as bellwethers of public opinion.

5.2 Special interest groups and the public

The views of Environment Agency staff about how representative special interest groups are of broader publics often have implications for how appropriate and worthwhile engagement with them is considered to be. One rule of thumb seems to be that the more representative a special interest group is of such publics, the more seriously its views should be considered. Linked to this is the view that it can be an inappropriate use of resources to engage with special interest groups that have little relationship with broader public views.

Staff generally expressed the view that, as the Environment Agency has limited resources for engagement, it is more worthwhile and justifiable to work with groups that reflect the concerns of a greater number of people. Environment Agency concerns about representativeness also stem from an assumption of the legitimacy of representative democracy in general and of established political institutions in particular. These are reflected in more widespread concerns about the relationship between representative democracy and new forms of public participation.

In democratic theory, the institutions of representative democracy such as parliaments, regional assemblies and local councils are usually seen as complemented by a range of intermediary groups such as community associations, religious bodies, trade unions, business organisations and campaigning pressure groups. These fill the gap between the individual citizen and the government and allow government to respond to citizens between elections: failure to do so effectively undermines the legitimacy of democracy. Thus governments in representative democracies are bound to take account of the views of organised groups, even when those groups represent particular or minority interests or perspectives.

There is much debate about how government can best manage this process: whether it can act as a referee between competing interests; whether there is a danger that national policy might be undermined by excessive responsiveness to special interest groups; or whether different 'interests' have such unequal resources that outsiders have little chance of influence. The decline in electoral turnout, party membership, and trust in government, and an increase in protest, boycotts, and other non-electoral forms of participation are widely seen as evidence of a problem with the quality of British democracy. Some of these developments can also be seen as evidence of a more

critical attitude among increasing numbers of highly educated citizens who are sceptical of government and experts. If this is a broadly accurate characterisation of new forms of participation, it suggests that public opinion and the representatives of campaigning organisations are more likely to challenge authority and will be more difficult to predict than in previous decades.

5.3 Environment Agency views about representativeness

Alongside the view that the Environment Agency should engage with special interest groups who are representative of a broader general public, interviews with staff highlighted alternative – sometimes apparently contradictory – views about the value and extent of special interest group representativeness.

5.3.1 Quality of the argument

Some Environment Agency staff argued that it was irrelevant whether a special interest group was representative and that what was important was the quality of the comments being addressed to the Environment Agency; if a valid point was being made it did not matter who it came from. Conversely, if the point was not valid, it would not matter how many people subscribed to it.

This argument has quite different implications for resource use than when representativeness is prioritised. It implies that all arguments should be thoroughly examined because there may be a ‘show stopper’ in there somewhere. Of course this is usually impractical, and there was ample evidence in the interviews of rules of thumb being developed to suggest where the quality arguments are most or least likely to emerge from, and thus which of the special interest groups will be most useful to engage with. These heuristics (explored in more detail later in this report) identify the conditions under which there is the least chance and the greatest chance of special interest groups providing good quality information (see Chapters 6 and 7). Others argued that both quality of comment *and* perceived representativeness should be taken into account.

A further criterion that affected the degree and nature of engagement with special interest groups was the power of the particular group. That is, a judgement was made about the extent of the impact that a special interest group might have upon the Environment Agency or its management of the situation. The idea here was that it was a good use of resources for the Environment Agency to engage more extensively with special interest groups that could potentially be more damaging. The group’s capacity need bear no relationship to how representative it is. The interviews with staff provided several specific examples of the value of listening hardest to those groups that had the most potential to impact Environmental Agency activity.

5.4 Implications of prioritising representativeness

If representativeness is considered to be important, some questions need to be asked:

In what sense could special interest groups be representative of broader publics / are special interest groups unrepresentative of broader publics?

Staff highlighted two dimensions of this. Firstly, special interest groups may be unrepresentative in terms of their demographic characteristics. For example, the predominance of older retired people in some small local groups was used as evidence that special interest groups are not a cross-section of the local population. Nor would they necessarily be representative of older people either, given that most local groups are small. Secondly, representativeness was sometimes considered in terms of how well special interest group beliefs reflected the views of the broader population. Here it was noted that, in contrast to broader publics who were often considered to be largely unconcerned about the issue in question, special interest group views were sometimes partisan or extreme. However, no inference can be made about the representativeness of special interest group views from their propensity to take particular types of action.

At one level special interest groups *are* inherently unrepresentative of the wider public insofar as they are motivated, mobilised individuals, whilst the wider public is manifesting much less visible concern. Special interest groups are engaging and taking action around particular issues, whilst the wider public is not. Minority groups such as special interest groups – with views that may be unrepresentative of wider populations and with whom consensus may not be attained – are an integral, normal and valuable part of the political landscape.

Finally, as special interest groups have not been democratically elected they are not obliged to be representative.

Does a quiet public mean an indifferent public?

One view expressed by Environment Agency staff was that lack of action on the part of the public could be equated with lack of concern. This argument was used to downplay the need to respond to special interest group concerns as well as to demonstrate their unrepresentativeness.

Special interest groups themselves tended not to equate lack of public involvement with lack of public concern. They noted that often people affected by various environmental 'bads' are poorer people who have more immediate day-to-day concerns and do not have the time or the energy to devote to campaigning.

If you are in a working class area, there are problems that are more immediate than emissions from a direct incinerator, there is that as well... ..So you know him and her both have low paid jobs, then you go home and you have the children to sort out and things like that, it doesn't leave you much time for other things really. Day to day grind is actually exhausting.

(Parents Against Incinerators)

Special interest groups also noted that people often do not express concern as they feel they are powerless to affect decisions and outcomes. This is a position well supported in the literature on political participation.

Lack of opposition to a development cannot be interpreted as a tacit endorsement of it. Special interest group interviewees appeared to have a much more substantial appreciation than did their Environment Agency counterparts that people may be completely against developments but lack the experience, the social networks and the financial security to actually make their views known. Rather it is those *with* the resources to act through their involvement in social networks that facilitate mobilisation. Similarly their educational and social capital gives them the confidence to speak the language used in official arenas.

Who do special interest groups claim to represent?

It is informative to consider the issue of representativeness from the groups' point of view. Who do *they* think they represent?

This question was addressed in the interviews with representatives of special interest groups. The notion of representativeness was usually considered more broadly than by the Environment Agency. It seemed that groups were very clear about who (or what principle) they felt they represented. There were no simple claims made that particular groups unequivocally represented whole communities. Some of the larger special interest groups stressed that they primarily represented their membership, although they could on occasion claim and quantify broader public support for the positions they took. One smaller group recognised that they did not represent broader publics but cited evidence of their support in the local community.

How can the Environment Agency tell what 'the public' think?

The literature, workshops and interviews with Environment Agency staff have provided no evidence of any instances in which the organisation has systematically tried to assess the degree and nature of the overlap between special interest group' and public perspectives, or of the extent of special interest group support in the community. If the Environment Agency does not know what broader publics think, it is not possible to make any inferences about representativeness. As noted above, it is likely that systematic assessment of public views will reveal a wide range of opinions about an issue.

Building good links with the community can help staff to see special interest group views in the context of the various other strands of opinion in the area.

Building links with elected representatives will similarly help staff to make out the broader views of the constituency.

When unrepresentative groups are a priority

As noted above, minority groups or special interest groups with views that may be unrepresentative of wider populations and with whom consensus may not be attained, are an integral, normal and valuable part of the political landscape. Many of these groups are increasingly the focus of policy attention. For example, recent Government initiatives, as well as Environment Agency activity, has been directed at identifying groups of people that may suffer disproportionately from the impacts of environmental change whilst being systematically invisible to those responsible for managing such changes. This focus on social justice issues – by definition involving a consideration of the concerns of unrepresentative groups – is likely to be of increasing concern to the Environment Agency. Special interest groups may, and national environmental organisations often do, articulate not only the special interests of their members, but universal interests, or the interests of people too poorly informed and / or resourced to represent themselves.

5.5 Special interest groups as early warning systems

The concerns that special interest groups raise may of course have wider resonance both locally and nationally. However, groups that are raising concerns considered to be unrepresentative of broader publics may be canaries in the mine of diffuse public concerns or bellwethers of wider and more active public concern.

Recent history has shown how issues about which special interest groups were concerned 10 years earlier have gradually gained broad support, culminating in a changing of government policies. This makes special interest groups valuable as they give early warning of emerging issues, as well as leading public opinion on such issues. Arguably, noting special interest group concerns should be a routine part of horizon-scanning exercises. Special interest groups can also play a symbolic role in 'representing' views from civil society and the public. Groups may often not be 'representative' of community views in the numeric sense, but there is rarely any expression of public indignation at being 'represented' by a special interest group on environmental issues. For the mass of people for whom environmental issues are a matter of diffuse concern but are not generally highly salient, special interest group claims to represent them make no major demands on them and seem quite reasonable. Given the lack of trust in government, and relatively high degrees of trust in environmental groups as sources of information, it is hard to argue that the latter are necessarily unrepresentative of public opinion.

Certainly the role of interest groups as bellwethers is recognised by some staff.

Pressure groups are articulating quite a significant sense of feeling about things in a community.

(Environment Agency Interviewee #7)

5.6 Special interest groups as service users

The Environment Agency seems happy to recognise businesses and operators as service users or customers. As a public agency it might justifiably view special interest groups as service users of equivalent status and standing to those in the business community. It might be argued that as operators pay the Environment Agency for Integrated Pollution Prevention and Control (IPPC) licensing, this entitles them to a different sort of service. However, if special interest groups are legitimate service users, their representativeness is no more or less an issue than that of business: certainly the legitimacy of a business is not assessed in terms of its representativeness.

If special interest groups are accepted as service users – even as a different kind to business – then they are entitled to some clearer definitions of what services they can expect. The Environment Agency could set out what it is prepared to do to meet its obligations to service users – irrespective of their representativeness. This is a one-way obligation: special interest groups have no such obligation to the Environment Agency. They can only accept or reject the level of service provided. Small groups generally have no public funding, nor any way of guaranteeing that they can control their supporters. In this respect at least they are not the same as businesses. This of course does not preclude informal relationships of trust developing between groups and the Environment Agency. Special interest groups with paid staff are in a somewhat different position. They are responsible for the actions of their employees and mutual obligations and some contractual relationships can be developed in this situation.

In this section we have suggested that the Environment Agency should not constrain engagement or minimise the potential value of engaging with special interest groups simply on the grounds that they are not representative of broader publics. Rather, given its limited resources, it should concentrate on ascertaining special interest groups' agendas, and discovering and evaluating the contribution that they might make to the decision-making process, and further, whether they may be giving an early warning of an emerging issue.

5.7 Overview of implications

It is always problematic to characterise a special interest group as representative of a wider population. Therefore:

- regard special interest groups as a useful source of intelligence about the ways in which issues are perceived by communities and check whether they are drawing attention to neglected aspects of an environmental issue;
- recognise that special interest groups, whether or not they are demonstrably representative of a substantial strand of public opinion, may be articulating issues that will in future be of wider public / political concern;

- do not assume that lack of apparent public concern means tacit endorsement. There are many other possible explanations, and issues of actual or potential concern to a community may be articulated only by small and ostensibly unrepresentative groups; and
- recognise that special interest groups may offer insights into 'public opinion', and may provide routes to more direct engagement with members of the public.

6 Science and expertise

6.1 Introduction

One important way in which staff tend to classify special interest groups is by the degree of scientific expertise they are perceived to have. The Environment Agency is a science-based organisation, so this interest in groups' perceived knowledge base (or lack thereof) is not surprising. How they are classified directly influences how credible the special interest group is perceived to be and therefore has implications for the ways in which the Environment Agency is likely to interact with it.

This is not a new way of classifying special interest groups. Diani and Donati (1999) identified two dimensions upon which special interest groups can be classified. They suggest that a special interest group will select a 'professional' or a 'participatory' approach to resource mobilisation. Those with a professional approach tend to focus upon the acquisition of resources and mainstream credibility. Such groups often possess scientific and procedural expertise. Those with a participatory approach tend to be more associated with local expertise.

Chapter 4 suggested that in many ways special interest groups can be unrepresentative of broader publics, although it was argued that this does not affect the importance of the Environment Agency's engaging with them. Arguably one dimension of this 'unrepresentativeness' is that groups often know a great deal about the issues on which they are campaigning. This expertise is in the form of scientific 'facts', local knowledge, first hand experience of the issue, or procedural knowledge. They have information that other members of the public may be largely unaware of or are ostensibly unconcerned about.

This research has elicited a range of views about the nature and quality of special interest group expertise, as well as about the Environment Agency's expertise.

6.2 Special interest groups and science

One view of special interest group scientific expertise that clearly emerged in the interviews with staff was that it was lacking or was not relevant to the Environment Agency.

For one interviewee, special interest groups' arguments that were 'not of good quality' were not relevant. Similarly, the role of lay inspectors was seen to add value only if the inspector was able to understand the technical issues. However, others suggested that at times staff could be arrogant about their own expertise, believing it to be above question.

Interest groups value science

In the light of these views it is interesting to note that none of the national and local special interest groups interviewed were anti-science in any way. Rather they were often concerned about the validity or independence of the science that the Environment Agency uses or cites, and the way that the organisation interprets that science. The fact that special interest groups were positive about science *per se*, can be most clearly seen in the way in which groups of all sizes see basing their campaigns upon good science as vital in achieving credibility.

There was clear evidence from larger national groups of the importance of good science to maintaining credibility.

It's critical to our reputation. I don't know that the [Environment] Agency think about it but it is critical to our reputation within government that they perceive [the group] to get its facts right really...

(Friends of the Earth - National)

...I think that as an organisation we do like to come across as an objective-led science-based organisation that comes up with solutions...

(RSPB)

Getting the facts right (doing good science) was seen as crucial to gaining and maintaining reputation; for example one group stated that they would not speak out on issues they had not researched, even if pressured to do so by members.

...issues such as fluoride in drinking water which we have not researched ... we are not going to come out and say that this is a bad health choice or a good health choice, you know we get pressured by our members saying you should say something around this, but we are not going to until we have done some research so we might lose some people.

(Friends of the Earth - National)

However, even those broad-spectrum environmental groups (such as Friends of the Earth) that emphasise the importance of basing their campaigns upon solid scientific evidence are not simply science-led in their choice of campaigns. They are also aware that they need to be responsive to their members and supporters and to focus on issues that have the capacity to attract resources, excite imagination and mobilise the support of their constituencies. The RSPB, unlike Friends of the Earth, is quite specialised and clearly focused, in the first instance, upon the protection of birds and their habitats. Its agenda is science-based and it is the research department that establishes priorities. Nevertheless, member and volunteer support is indispensable and representatives recognise the need to be responsive to members' concerns.

It was clear from the interviews that special interest groups have to grapple with the issue of relating science to their members' interests and their concerns. National

organisations recognise the value of local knowledge but also see the need to assist their members to engage more effectively with the science.

Local people are often very knowledgeable about an issue, but are not sure how to express this knowledge, or who to go to with it

(Friends of the Earth - Local)

It is not only national special interest groups that are concerned with scientific credibility. Evidence from interviews with small single-issue local groups suggests that they also often pride themselves on only saying things for which they believe they have scientific evidence. This is an important route to maintaining credibility and, to some extent, to being protected from challenge. This is particularly notable as it is these groups that the Environment Agency is much more likely to class as emotional and irrational. They considered it vital that they gained access to expertise both through their own learning and through acquiring the services of 'independent' experts.

There was some evidence in the interviews that special interest group engagement with science was sometimes generated or fuelled by a lack of trust in or an unsatisfactory response from the Environment Agency. Smaller groups acknowledged that whilst personal expressions of concern from individuals might not be satisfactorily dealt with, it may be harder for the Environment Agency to ignore more official approaches and this may be more the sort of language that the staff like to talk.

(We) had a preliminary report (from the [Environment] Agency),.. a report saying that there was rather too much water and yes we did fail here and we did fail somewhere else, it then was just closed. That seemed to me totally inadequate, so probably about three or four of us ...said we have got to set up a group if necessary, and that we did. Initially we had something like eight people, eight or nine people in the group. that's all in the group, but we conducted a survey, one of the first steps we did was conduct a survey all areas, people that had been flooded, to ascertain the degree of damage or loss...

(BAG – Bottesford Action Group)

We were told at one point by the Environment Agency that it was not the quantity of objections it was the quality so we stopped collection signatures after we had a lot. Started doing a lot of research, I mean a lot of research....

(Parents Against Incinerators)

Sources of scientific information for small special interest groups

Clearly core members of local groups take the process of bringing scientific expertise to bear on the issue of concern very seriously. They do this both by learning themselves and by consulting experts.

People can learn about all kinds of issues just by doing a lot of reading.... I had an O level for general science and I scraped it. I have had to learn a lot. Reading and

reading and reading, that is the only way to start... at square one. I couldn't even remember the formula for chemicals and things like that and I still get muddled up with a lot of things, but you keep on reading and reading and trying. And basically what we are looking at is not nuclear science. It's fairly basic learning, it isn't difficult to get your head around.

(Parents Against Incinerators)

Special interest groups commonly use US sites and information, notably the US EPA (Environmental Protection Agency). Material on the Internet often contradicts Environment Agency information and staff may argue that it is inaccurate and unhelpful. It might be worthwhile for the Environment Agency to consider how the information it provides on its web site links with more 'independent' sources that are more likely to be trusted and that provide information staff believe to be of good quality.

Special interest groups report that they do try to check the validity of information from the Internet. However it is clear that, by their own admission, the criteria upon which they evaluate the science are often based on criteria such as 'who funded it?' One of the strongest themes regarding expertise for the smaller issue-based groups was that of 'independent expertise'. This was not simply a matter of ensuring scientific validation of the pre-existing special interest group view; it was more a way of assessing the reliability of the Environment Agency expertise. For one local anti-incinerator group in particular, the primary way of judging this was to examine who paid the expert. This was equated in a straightforward and unproblematic way with the credibility of their views. This group did their own research and recognised the need for specialist expertise – but the credibility of the specialists was based on their history of independent work – i.e. an interest-based evaluation. There was an inherent suspicion of highly paid experts; this evaluation was based on common sense criteria (i.e. who pays them) rather than an evaluation of science in light of scientific principles. For another group, the credibility of the Environment Council as the convenor of a participation process was undermined by the belief that they were, in part, financed by a landfill company. These views are at odds with the science-based focus emphasised by Environment Agency staff.

Some of the smaller special interest groups complained that the Environment Agency shows little awareness of the research that the Environment Agency itself relies on. Some of that research may be good, some not, but if Environment Agency staff appear to be unaware of it and not to have evaluated it, or not to be persuasive as to why it is not reliable, these groups are likely to continue to view their research as 'best'.

Environment Agency views of special interest group science

By and large the scientific knowledge that smaller local groups have is often characterised by Environment Agency staff as being of little value, and as reflecting misunderstandings of the provenance and purpose of particular studies. However, the evidence from special interest group interviews suggests that even small groups have a good grasp of the policy issues related to the science, or are prepared to *learn* how to understand issues if they are initially not understood. To be able to take a reasoned and well-informed position it is not always necessary to be fully literate in the science. It may be useful for Environment Agency staff to consider the view that most of the information relating to policy decisions is not technically difficult and not necessarily more difficult than the kinds of choices people face routinely in everyday life (Fischer,

2000). This is also important because, as noted in Chapter 4, assumptions made by the Environment Agency about how technically able people are will have implications for the communication strategies employed.

Other recent research provides evidence that people with no scientific training are both willing and able to take part in decision-making processes around uncertain and complex issues: 'They are willing to balance information from different sources, are able to deal with complex science if given sufficient time, understand uncertainty if openly acknowledged, and are happy to balance risks and benefits' (Petts, 2000).

It was generally implied by staff that the Environment Agency is objective, a kind of neutral referee. In contrast, they usually imputed a narrow range of interests to special interest groups. There was little acknowledgement of the ways in which Environment Agency views can also be subjective.

Staff in the workshops suggested that the general ethos of the organisation was that it was technically superior and 'correct'. This is often associated with a failure to take concerns seriously when Environment Agency science suggests there is no basis for them. There was some recognition, though, that technical solutions are not always best, that awareness of the wider picture is important and that there is some value in taking a holistic approach looking at political, environmental, technical, social, employment and financial issues.

6.3 Special interest groups and local knowledge

In contrast to scientific knowledge, ordinary knowledge is 'knowledge that does not owe its origin, testing, degree of verification, truth, status or currency to distinctive professional techniques, but rather to common sense, casual empiricism or thoughtful speculation or analysis'.(Lindblom and Cohen, 1979). Local knowledge can be characterised as ordinary knowledge in a local context.

The involvement of concerned individuals who have local knowledge is vital when applying principles to specific contexts. This perspective requires an assessment of the empirical circumstances and can make an important contribution to problem identification, definition and legitimation. Ideally it should be part of the process of reaching solutions and play a role in building legitimacy for citizen involvement.

Many 'green' special interest groups think that governments and large corporations have a poor grasp of local issues. One concern is that the pressures of international competitiveness mean that local environments are put at risk (by government and corporations) in order to meet economic goals. Given this belief, special interest groups' uncertainties about the competence of official bodies such as the Environment Agency and about the validity of its scientific studies and risk assessments could be seen as entirely rational. As noted above, this does not constitute a rejection of science as such; rather special interest groups see science as uncertain, disputed and misused, and hence, this can make them question whose science they can trust.

It has been suggested that both the Environment Agency and special interest groups value scientific knowledge, but that both question each other's science. Environment Agency staff were much more likely to highlight the potential value of special interest groups' local knowledge. Some staff recognise that local knowledge is important, cannot be acquired from any source other than local communities, and is vital in understanding how local people feel about issues. However, staff did not acknowledge that local knowledge might be crucial to the development of technically adequate and relevant solutions. Indeed staff rarely considered that local knowledge could include any 'useful' technical information that might influence decision-making. Arguably these views are coloured by the way in which Environment Agency employees prioritise the technical and social aspects of their work.

I think the thing that ... we've got to be absolutely on top of in terms of listening, is local knowledge. I think its a fact people know their local area, and can tell us things that we never in a thousand years will gather through just not having that intimate relationship with the locality. Local knowledge is something that almost invariably local people bring into situations.

(Environment Agency Interviewee #7)

R ... *The key area for us is to work better with the voluntary sector because they have opportunities that we won't have on our own.*

I *What do you think they are, specifically?*

R *In terms of having better local knowledge, better links with local communities, which because that tends to be their reason for being, whereas for ourselves we cover a large area and we're never going to have that kind of knowledge because our area is too large.*

I *So they've got the ability to contribute a particular sort of knowledge that the Environment Agency don't have access to?*

R *Yeah.*

(Environment Agency Interviewee #9)

In this sense then, special interest groups are seen as a key route by which national organisations – such as the Environment Agency – might gain understanding of local nuances.

Local knowledge is thus generally viewed by Environment Agency staff as a substitute for or complement to formal scientific knowledge and technologies. In some ways, this marginalises or misses the significance of local knowledge. Understanding local knowledge offers an alternative way of understanding special interest group that is not simply about filling gaps in science.

It is interesting that special interest groups themselves do not see their contribution in terms of simply providing local expertise. Their focus is more often upon questioning the Environment Agency's science and practice. Where special interest groups did note the importance of local knowledge, it was seen as complementary to mainstream science rather than as a substitute for it. However, as noted earlier, it may be that the

Environment Agency's emphasis on the importance of objective science leads groups focus on gaining and communicating expertise of this kind, rather than in respect of local knowledge.

6.4 Procedural expertise

Special interest groups often become experts in procedural knowledge. The history of campaigning in an area has two important implications. Firstly, communities can become politicised by campaigning on a particular issue, and this will increase the likelihood of further campaigns, even on unrelated issues. That is, areas can develop a kind of 'campaign memory', and the confidence to oppose the authorities. Where areas become politicised by previous issues, local residents may acquire 'activist' identities – and not necessarily only on environmental issues. For example, in Glasgow, the estates that mobilised most strongly against the extension of the M77 were those that had existing networks that had worked together through the local community council on housing issues and to resist the introduction of the poll tax in 1990 (Seel, 1997).

Secondly, areas with previous (or current) campaign experience will contain individuals with knowledge about 'how to run a campaign' or 'how to set up a special interest group', and new campaign groups will be able to model themselves on previous groups. Individuals who are – or have been – members of campaign groups are likely to know things like how to organise a group, how to mobilise people and resources, how to obtain funding, what kinds of strategies are effective and so on, and can educate new groups by passing on this knowledge. They may also have a lot of existing contacts that can be used. Indeed, most evidence suggests that education and organisational memberships are most positively linked to political participation, as they provide the confidence to engage, knowledge of the most appropriate language to use, and appreciation of wider issues and how to research them (see Parry *et al.*, 1992).

6.5 Special interest groups' views of Environment Agency expertise

Special interest groups varied in the extent to which they valued the Environment Agency's expertise. Certainly the larger national groups recognised its expertise in, for example, flood defence and water management.

...I think that the Environment Agency has a much broader range of expertise in floods management... When we work together on individual projects on the ground, if it is say, the restoration of a wash lands site... the Environment Agency brings its technical expertise, especially its engineering knowledge, also its the hydrological knowledge they have for catchments and their ability to model how that hydrology might change. And so they have a huge database of environmental information as well that they have collected over a long time, which is very useful in terms of trying to look at how the catchment might have changed over a long time...

(Lincolnshire Wildlife Trust)

The Environment Agency was generally commended for the quality of its technical information (species data, hydrological data, flood plain data etc.) as well as its willingness to share this – both to callers at their offices and via their web site.

...they now are producing the best pollution inventory in Europe...

(Friends of the Earth - National)

One aspect of special interest group activity, however, was to draw attention to the possibility of alternative interpretations of the Environment Agency's data. The perceived limitations of its expertise were also noted. For example, in relation to flooding issues, a flood action group (BAG) with its own professional scientific expertise suggested that in one location, Environment Agency models were not accounting for the interaction of various water sources – possibly because some of these water sources were not its responsibility. The accuracy of the Environment Agency flood-plain map was also called into question.

R *...because I knew that they wouldn't have modelled that connection properly we have got a whole series of subsidiary questions... and all we got back was effectively an email that took two and a half months [for a reply] and it was bullet points as if it was going to be a presentation. They said that they had effectively looked at the Deven [River] and that they had not been able to take into account the attenuation of these various culverts and so forth which was absolutely crucial. So they were assuming a very simplistic flow. And even then they said well even one in a 100 the water will be at about road level, so plus or minus about ten percent...*

I *What did you feel about that reply?*

R *Let down. Because I felt that they were being amateurs. Lovely people... don't get me wrong.,, When they said to me our modelling capability won't allow us to set parameters for these models but you can you model that bit... you can calculate what is a normal flow through that culvert and therefore you effectively are extracting that ... from the volume that is coming down, and you see the build up and then you take the next because you know what is flowing through there, and you try to do it, and you build it up piece by piece. And I thought at least they could have got a lot closer than they did.*

(BAG)

This representative of BAG was in a good position to judge the strengths and weaknesses of the Environment Agency on this issue as he had considerable expertise in modelling in a previous career.

The same flood action group also suggested that the Environment Agency does not always appoint the most appropriately skilled people. For example, the interviewee from this special interest group was critical of the fact that the Environment Agency seemed to have too few hydrologists and engineers. Another small group, focusing on protest around an incinerator siting, suggested that the organisation doesn't take account of best US / EU research.

In conclusion, it would seem that the national special interest groups, and local groups affiliated to national organisations, basically trust the Environment Agency, whilst regarding it as slow to change and often still locked into old habits. This is primarily equated with the prioritising of a technical perspective that is slow to acknowledge or incorporate the expertise and experience of local communities. It was suggested that the Environment Agency needs to pay much more attention to non-technical matters and learn to become a better listener. The Environment Agency should not assume that local people don't know about their environment; nor should it be surprised that people can read graphs and have good technical knowledge themselves. Different approaches are needed for different audiences; but whatever the situation, it is important that the Environment Agency is not perceived as patronising those with whom it is communicating.

There was a clear theme in the workshops that institutional practices could change the way in which interest groups are perceived by staff and the trust that is accorded to them. These practices included the use of local knowledge, being honest about the (in)exactness of science, making as much information and data available as possible (public register, Internet, etc), including information about environmental legislation.

6.6 Overview of implications

- Recognise that local special interest groups may be well-informed even on technical matters, and where they are not, do not assume that they are incapable of understanding technical issues, because they may be useful conduits to a wider public that is initially difficult for the Environment Agency to reach;
- Consider making sources of science more accessible – both in the way that science is spoken about and via the Internet;
- Be aware that special interest groups are likely to want to engage in debate on alternative scientific sources; and
- Consider how local knowledge might inform the development of technically robust and relevant solutions.

7 NIMBYism

7.1 Introduction

Environment Agency staff characterise many small local special interest groups as exemplifying a NIMBY attitude. Stewart (2002) offers a succinct description of a NIMBY, as someone who accepts a general principle, but then objects when that principle is applied in a manner that directly affects them, i.e. that they are driven by self-interest rather than by principles.

This section of the report briefly looks at the concept of NIMBYism and at the evidence in the interviews that smaller special interest groups are motivated in this way. It is suggested that although some groups might be classified as NIMBY groups, it is not helpful to label them nor to discount them on this basis.

7.2 Local protest may not be NIMBY

Any local opposition to a proposal can be interpreted as NIMBYism, and that the protection of local interests is its prime motivation (Burningham, 2000). Local opposition, however, is often less straightforward than NIMBY implies. For example, the apparently 'selfish' element of NIMBYism is very rational (Burningham, in preparation). People are bound to feel more concerned about issues that are close to where they live. On the basis of this they may become, politically, a more 'active public'. For members of the public faced by the complexities and uncertainties surrounding global environmental issues, the backyard is familiar territory within which to ground their concerns (Rootes, 1999c).

Local concern does not however automatically imply a NIMBY attitude. Indeed, local people may never have even *thought* about an issue until it suddenly becomes very salient in their area. When a contentious issue arises in a locality, the inhabitants will often undergo a very swift education about it. This learning process can often lead to genuine and ongoing interest in the wider-reaching implications of an initially local issue, and how it relates to national or global issues (McLeod, 1998).

Apparent NIMBYism is therefore often symptomatic of a nascent, more general, national, public concern. Using the example of UK road protests, public concern was most visible at the specific sites of proposed road schemes – and could have been misinterpreted as isolated instances of NIMBYism. In fact, anti-roads protest transcended NIMBYism, and became a well-supported national concern. Most local groups challenged the principle of a transport policy that gave priority to motor vehicles, and did not simply oppose their own road (Burningham, in preparation). Certainly some special interest groups use issue specific campaigns as a means of raising awareness of more general principles. Seel (1997) and Burningham and O'Brien (1994) both suggest that broader ideals concerning health, democracy, lifestyle, social change and personal freedom are regularly on the agenda in protests at all scales and with varying

foci. So, although a protest may well have a particular goal, it can also stimulate people to think about broader rights and liberties. Specific issue protests are also often held as local examples of more national or global issues. Thus, it is important to realise that whilst NIMBYism may understandably exist in many instances, it may also be indicative of local people and special interest groups taking the first steps towards a principle-driven outlook, primed by their close proximity to a contentious issue.

Applying the NIMBY label is often seen as an attempt to neutralise or discount local opposition. The interviews conducted with both special interest groups and Environment Agency staff suggest that attributing NIMBY attitudes to special interest groups can be as much of a barrier to the resolution of environmental issues as the phenomenon itself.

There was certainly some evidence in the interviews that special interest groups seen as NIMBY were characterised as having a narrow, biased, or emotional point of view (see Chapter 4). Their biases and emotionally charged views were compared negatively to the subjective views of other stakeholders. These in turn were contrasted with the objectivity of the Environment Agency. These qualities were seen to limit the legitimacy of such interest groups as interlocutors.

7.3 Small special interest groups may have the big picture

There was actually very little in the interviews with representatives of smaller single-issue groups to suggest that they are prey to NIMBYism. Rather they provided considerable evidence that their groups were well aware of broader issues relating to science, social justice, and national and international environmental practice. A small anti-incineration special interest group, for example, had tracked the performance of the local plant operator in sites across Europe, and was involved with the Global Anti Incineration network as well as similar local groups across the UK. The group was aware that industry was vital but wished for a more substantial consideration of cleaner technologies. The same group noted that a by-product of the activities of their group was the building of capacity to resist future locally unwanted land uses. Although this may ostensibly seem a NIMBY comment, it was also harnessed to concerns about social justice and a desire to work against damaging impacts being imposed on poorer areas. For this group, environmental justice issues were an important motivator and part of the group's identity.

It is also interesting that some special interest groups highlighted instances where they perceived the Environment Agency's perspective of environmental issues to be too narrow. For example, a Friends of the Earth local co-ordinator suggested that the Environment Agency should and would develop a clearer overall picture if the focus moved away from considering individual plants in isolation. She also referred to the importance of the bigger picture in terms of understanding the effects of exposure to a combination of industrial pollutants. Both of these considerations were linked to the argument that the Environment Agency needed to develop a more substantial social

justice perspective which was clearly a motivation for the activities of Friends of the Earth.

We wanted to make particular arguments to the governments about social exclusion and the environment and poverty and those links and joining them up. So we wanted a project that could start to make the political arguments about the links between pollution and poverty...

(Friends of the Earth - Local)

Similarly, a local flood action group – whilst acknowledging concerns about flood damage to their property and how house prices might be affected – argued that local groups have a ‘bigger picture’ than the Environment Agency on these issues because of local understanding of how many different water sources interact and contribute to the flood problem. This group representative also highlighted that it is not just self-interest, but also altruistic concern for others in the community and elsewhere that motivates active participants.

There was also evidence that the concerns of smaller local special interest groups are not always non-negotiable. To the Environment Agency these groups appeared to be implacably opposed to incinerators, say, or landfill and yet the interviews suggested that they were prepared to accept facilities, providing reassurance could be given over monitoring and safety.

The evidence above suggests that it may be unhelpful for the Environment Agency to categorise special interest groups as NIMBY. This is not to deny the existence of groups whose primary focus is the perceived threat to their quality of life, that are highly focused on protecting home environments and who defy experts who present themselves as being the ultimate arbiters of risk.

7.4 Calculations of risk in local developments

Authorities like the Environment Agency use a probabilistic calculation of risk which is antithetical to the absolute calculation of risk that is commonly employed by the locally affected population. A probabilistic calculation of risk is appropriate for a national planning authority for whom possible hazards, and hence the probability of risk, can be averaged over a large number of cases. It is no comfort to the local population for whom the one in 300-year chance of a serious incident may just happen to them tomorrow and who fear that the one in 10,000 'deaths brought forward' may be their own. The planners' logic is that risk is unavoidable, but should be contained at an 'acceptable' level; the residents' logic may be that the only acceptable (additional) risk is zero.

Rootes (2000) makes this point, noting that ordinary citizens confronted with a local development perceive risk differently than do planners and scientific experts, and this makes communication between them extremely problematic. Whereas experts and planners usually assess risk on the basis of quantitative, rational and probabilistic criteria, the opponents of development consider risk in terms of qualitative and absolute

criteria, such as their perception of the possibility of a major catastrophe and their lack of control over the situation (Masterson-Allen and Brown, 1990).

Environment Agency staff are often likely to counter special interest group concerns with risk assessments that are communicated in terms of rationally demonstrable data and scientifically standardised information. However, this does not address special interest group concerns insofar as the nature of the problem is not simply technical. For example, the issue may be as much about the character of a community and how local land use is decided as about the safety of a facility. Thus the Environment Agency and that special interest group's definitions of the problem may be quite different. It is also possible that although it is local land use that is the primary problem, safety concerns and scientific uncertainties around safety may present a good opportunity for fruitful special interest group activity. Indeed the presentation of technical information by the Environment Agency without ostensibly recognising broader concerns may also play a part in developing a fruitless and conflicting exchange based upon different scientific explanations.

7.5 Moving past NIMBYism

So what is the alternative to the development and maintenance of opposing and entrenched positions? Although there is little systematic evidence, the Environment Agency should be encouraged by the success of particular participation initiatives. Where public participation is built into the decision process from the start, evidence in Canada has shown 'that a democratically inspired discourse can be constructed toward a positive end for the most positive and fear-invoking type of facility' (Fischer, 2000). Fischer describes the process that led to the construction of the first major incinerator to be built in North America in Swan Hills, Alberta in the late 1980s.

'Participation in the project was built into the decision process from the beginning, commencing with a local plebiscite on the acceptability of the siting decision. After the plebiscite, in which the citizens indicated their willingness to consider accepting the plant, the regional government supplied the Swan Hills community with funds to hire its own experts and consultants and organised extensive public meetings to discuss with community members and their consultants the nature of the plant and its consequences. Once the site was accepted, the government provided the community with additional monies to offset the extra burdens to the local infrastructure and to hire its own expert advice.'

It might be argued that this is an unusual case insofar as the community first signalled its willingness to consider the facility. Other examples of participation exercises (Renn *et al.*, 1996) demonstrate that local people were capable of rationally examining the evidence and understanding the issues, but it was much harder to come to the decision to accept the facility.

Key to the success at Swan Hills, however, is the recognition that community members bring to the decision process another kind of rationality than technical rationality. This has been termed 'cultural rationality' (Plough and Krinsky, 1987). This is a distinctive form of rationality that is shaped by the circumstances under which the risk is identified and publicised, the standing or place of the special interest group within the community

and the social values of the community. Local people are especially likely to rely on local, particularistic and absolutist principles – prioritising for example, the question of who can be trusted and why. The reliance on such principles is likely to be especially strong when they believe that the institution or agency proposing the activity is not to be trusted. As we have seen, this is quite likely to be a consequence of the way government authorities are viewed, quite apart from any specific grounds that groups may have for suspicion and / or distrust (see Chapter 3). There is nothing irrational – or avoidable – about the way in which groups factor socio-cultural experiences into their interpretation of experts' technical data on risk. This may be because science – being inherently probabilistic and provisional – cannot supply all the answers. It may also be because science is not relevant to the way local communities believe the problem should be framed.

Understanding this distinction between 'cultural rationality' on the one hand and technical rationalities on the other may help to explain some special interest group practices that cause problems for the Environment Agency. As an example, the practice of special interest groups constantly writing to raise the same points (see Chapter 8) or persisting in asking questions about issues outside the Environment Agency's remit can seem wilfully obtuse or irrelevant to staff. While on occasion this may be so, at other times it may be a way of bringing local knowledge, particularistic perspectives and an absolutist conception of risk to bear upon technical issues. The Environment Agency is not readily able to respond to these types of issues.

Participation is not necessarily the answer. The quote below gives an example of a forum where special interest groups are brought around the table alongside other ostensibly more expert groups, with an independent chairperson. However, the aim here is not to bring cultural rationality and local knowledge to bear upon the issue but rather to dilute the protest groups, putting their positions within the context of wider public opinion.

(We) recently formed a stakeholder forum... we've sort of invited...groups, but some of these groups would be chambers of commerce, trade unions, the operator themselves... local councillors, community councillors. So, anyone who's got a legitimate claim can get involved in these groups and that would involve the protest groups as well. And I think they might. Having that wider base, it dilutes the protest groups for a start 'cause they realise there's a big picture here...

(Environment Agency Interviewee #3)

There is an implicit acknowledgement here that from the point of view of protest groups, stakeholder forums may seem to be elite-dominated, that is, dominated by those in positions of power. Such elites may have mutual interests and interact in other forums. Thus the formation of a forum may be perceived as a way of 'diluting' a protest group, which may be the main 'outsider' group. From the point of view of the group, taking part in a consensual process that may lead to compromises that weaken their case might not be a good strategy. The protest groups may only be able to make the local elites take notice if they stay militant and generate enough outside pressure to seem significant, and perhaps also exacerbate any divisions among local elites.

In many instances special interest groups' cynicism about formal processes of participation or deliberation is caused by a public authority's failure to respect their values; for example, by appointing mediators who are not seen to be independent or making decisions before consultations have taken place.

The comment below seeks to show how tolerant the Environment Agency is, while demonstrating at best an instrumental view of what special interest groups can contribute. That is, special interest groups are seen to offer particular kinds of knowledge – perhaps technical or local – and may spot something that had been missed. There is no suggestion that the Environment Agency may be forced to rethink any points of principle or its own wider role, as a result of the dialogue.

But the local groups initially were cock-a-hoop, they thought they'd achieved this – it would have happened anyway whether the local groups had... – but after 2 or 3 weeks you got this sense that 'oh, its a bit disappointing' ...and you then began to find that these people were turning up at groups associated with protests against other industries... the oil refinery, the shipping... And I've seen this with other sites as well and its often occurred to me that if there was some mechanism by which... ourselves, or the local authorities, or organisations like Keep Wales Tidy... if they were able to step in at the right moment to say... 'could you help us' to these groups, they might find they got a useful source of energy, I think.

(Environment Agency Interviewee #3)

As well as considering how to incorporate a greater consideration of cultural rationalities in its decision-making process it is also critical for the Environment Agency to recognise its own subjectivity and to consider whether science is the most useful paradigm for problem framing in every instance. Environment Agency staff need to be open to the possibility that interacting with special interest groups may lead to significant change and require them to rethink points of principle or the wider role of the organisation. This goes well beyond developing a benevolent, tolerant or even utilitarian view of special interest groups.

7.6 Overview of implications

- Avoid dismissing special interest groups on the basis that they are NIMBY groups;
- Recognise and welcome the development of national and global concerns from local concerns;
- Recognise that locally affected populations will not be reassured by probabilistic calculations of risk; and
- Be prepared to rethink points of principle or the wider role of the Environment Agency as a result of dialogue with special interest groups.

8 Cycle of engagement

8.1 Introduction

This chapter considers various facets of the cycle of Environment Agency engagement with special interest groups and makes some suggestions as to how staff might relate to special interest groups more effectively given the resource constraints within which both operate. It is not always possible to specify the start and end point of this process. Some phases in the cycle of engagement can be identified, however, and this section will consider these, as well as exploring the process of disengagement.

In looking at the cycle of engagement, it is useful to briefly reflect upon the inevitability of conflict. Conflict itself may not be inevitable but there is always the *risk* of conflict, and thus the art of 'conflict management' is very important to the Environment Agency. There may be external factors that limit the extent to which consensus can be reached. A lack of consensus and a continuation of conflict does not always indicate a faulty engagement strategy. The Environment Agency must recognise that some differences are irreconcilable. Consultation cannot always resolve issues, and some situations are 'no win'. The ongoing presence of conflict does not, however, mean that developing a thoughtful, strategic, consistent and locally relevant mode of engaging with special interest groups is redundant. Such an approach is likely to have beneficial effects for the Environment Agency's reputation and for future interactions. The continued presence of conflict also does not preclude the possibility that the engagement process will lead to improved environmental decision-making.

Thus there may be value in the engagement process itself as well as in the potential outcome of improved decision-making. For many special interest groups, being involved can be as important as the final outcome of the consultation (Chess and Purcell, 1999). Individual issues are sometimes conceived of as 'battles' in a larger 'war'; losing a battle is less important than being given the opportunity to be involved in the battle, and there is still hope that the 'war' can be won. Even if the 'war' is also ultimately 'lost', groups often recognise that being involved in consultation at least gets the issue talked about more, and has other desirable effects in the empowerment of active citizens. Even on issues where special interest groups' chances of achieving their goals are virtually zero, campaigning – and the delays caused by campaigning – will lead to increased discussion of issues, and is often a very positive experience for those involved. It should not be assumed however, that it is *simply* being part of the process of protest that motivates group members. There is much evidence to suggest that people's experience of campaigning politicises them in a broad sense.

8.2 Environment Agency and special interest group beliefs about engagement

Environment Agency staff, perhaps unsurprisingly, have a preference for interacting with stakeholders who are familiar and have similar aims and structure (Christie and Jarvis, 2001). The Environment Agency is much more comfortable interacting with groups with whom it shares scientific, professional and non-radical approaches (see Chapter 6). Where special interest groups can talk on similar terms about environmental policy, they are more likely to be able to work with the Environment Agency and other specialists from government and business on a largely consensual basis (Hajer, 1997).

I mean I know there are some pressure groups with whom many people in the Environment Agency have a lot of sympathy. Surfers Against Sewage – they were our favourite group actually, because they were always rational, always powerful in their arguments, always logical, made very good cases and they were right. So, they did get a lot of respect.I think it varies from group to group. I mean there are some groups like the RSPB, who we're always glad to hear from because they give us good advice... we know it's sound, rigorous, we can rely upon it and make use of it.

(Environment Agency Interviewee #3)

Some special interest group interviewees were highly attuned to doing their best within the system as it stands but some of these had only a limited awareness of the potential difficulties of representing their interests (e.g. wildlife) in a policy arena where prosperity and business interests are key.

Many staff in both the interviews and workshops hoped that less radical groups would be able to work with the Environment Agency. Certainly there would seem to be considerable scope for joint organisational projects although workers in special interest groups would not necessarily share Environment Agency values. Of course, special interest groups themselves varied in relation to the extent to which they were able and willing to work within the Environment Agency system. The local groups that were campaigning in relation to incineration issues largely felt that there was no way for them to co-operate.

The larger special interest groups generally saw co-operation with the Environment Agency as extremely desirable. Partnership schemes involving many organisations allow each to contribute their particular expertise to the whole and were seen as valuable, for example, in relation to the work on the Humber Estuary. One clear theme emerging from the interviews was that representatives of these groups believed that the Environment Agency does not fully appreciate the potential gains to be made from engaging with them.

One national group noted an occasion where they believed that their group could have played a valuable bridging role in introducing the Environment Agency to the local community had they been asked. Another national group concerned with wildlife noted

a greater willingness in Environment Agency staff to co-operate with others and yet felt the organisation was slow to change and slow to trust. The group increasingly saw and appreciated the Environment Agency as a partner in the common pursuit of biodiversity and sustainability, but nonetheless felt that it is less than comfortable with the idea that the special interest group might take an initial facilitation role in building relationships with the community.

I think... they find it very difficult to change from (being) defensive, to recognising that the position is different here.... Here is an opportunity for a partnership, an opportunity to look at how we can mutually benefit each other, because we have a common goal, we have not got something in conflict. I think that they find that hard to see that is the different role that we are now in, compared to where we were subjected to particular schemes before something like that. They think that we have an underlying motive, but we feel we are being very clear about why we are involved and what we are trying to do.

(RSPB)

A similar reticence was noted in what was perceived to be a poor response to a local special interest group initiative to set up a working group including the Environment Agency, various organisations responsible for water sources, and a representative of flood victims. However, initiatives such as the National Flood Forum suggest that in other areas the Environment Agency is more open to collaboration and partnership.

There may be several reasons why the organisation can be reluctant to engage in processes instigated by special interest groups. It may be because of less harmonious relations in the past. In addition the Environment Agency is a large, cumbersome bureaucracy that has difficulty flexibly incorporating relatively unusual procedures. Staff may also mistrust the special interest group, seeing it as a lobbying organisation capable of mobilising its many members. One group (with whom the Environment Agency had worked) suggested that another possible reason for a perceived lack of desire for collaboration is the belief that special interest groups possess inferior expertise. But by the same token they also acknowledged the increasing willingness on the part of staff to consider that the group was 'on their side' and to work with them to ensure that local flood initiatives are appropriate for the local community. The group believed that the Environment Agency had recognised the value of informal monitoring of rivers, were happy to attend meetings facilitated by the special interest group, as well as working on non-Environment Agency-led proposals.

Although clearly showing a preference for less confrontational tactics, many special interest groups implicitly or explicitly reserve the right to use such tactics if the going gets tough. Awareness of this is one reason for Environment Agency caution in dealing with these groups but it is not sufficient justification for failing to pursue joint initiatives with special interest groups where they appear possible and likely to deliver environmental benefits.

One large national special interest group said it would like a good working relationship with the Environment Agency and believes this to be attainable. However, it was clear that the group would continue to be critical of practice that it disagreed with. It would be worthwhile for Environment Agency staff to consider what limitations this approach

places on co-operation. Co-operation with national special interest groups might provide them with ways of drawing on the legitimacy afforded to environmental groups such as Friends of the Earth by those concerned about environmental hazards. For example, Friends of the Earth agrees with the Environment Agency's often-criticised view that burning tyres could be considered the least bad option for the environment in the current circumstances.

There is value in recognising that members of the public sometimes place more trust in special interest groups and that special interest groups can have a greater understanding of the public, a closer relationship with public officials, more local expertise and, on occasions, a greater understanding of the complexities of issues. In this way they can be credible and viable partners in the process of making good decisions about the environment as well as improving the quality and speed with which work is carried out.

8.3 Planning engagement

The first aspect of engaging with special interest groups might be considered the importance of planning; the importance of having an engagement strategy. Without such planning there is little chance of the Environment Agency being pro-active; rather it is forced to be *re-active*. In the workshops it was noted that such 'fire-fighting' was a common mode of Environment Agency response.

There is a good example in the Environment Agency literature of such strategic planning activity.

A Selective Licence Application Team (SLAT) was set up around an application to incinerate meat and bone meal at Glanford Power Station North Lincs (Twigger-Ross and Smith, 2000). This team produced a plan identifying actions, deadlines and responsible officers. They considered and discussed which problems were likely to present themselves and were also seen to have a valuable role in monitoring progress across the whole cycle of engagement.

A brain storming session identified both technical and non-technical questions that were likely to arise and possible responses. This process involved the team in considering and discussing many of the problems that were likely to present themselves and the Environment Agency was therefore better equipped to deal with these problems when they arose. The establishment of the team resulted in a pool of expertise / ideas / decisions being created. This was also a central source of clear communication to other staff. The team met regularly and discussed the procedures and action plan as it progressed. Other Selective Licences were also dealt with by this team.

Clearly to some extent the strategy to be developed would vary in relation to the nature of the issue and the locality. However, it would seem possible to outline some core issues that should be addressed in each instance. The following are important dimensions to address in the development of a strategy for engaging with interest groups and other stakeholders:

- What are the range of opinions, beliefs and concerns that exist in the community about the issue? Which views are held most strongly and by whom? (Changes in EU legislation will require that consultation involves more recognition of others' objectives)
- What are the plans to engage with special interest groups in the short, medium and long term?
- Which are the key groups? What common ground does each of these special interest groups have with the Environment Agency? Are there any special interest groups that are likely to have difficulty making themselves heard?
- Which are the key personal relationships that the Environment Agency should develop with special interest group members?
- Which other groups and individuals are special interest groups talking to?
- What commitments can be made about engagement? How do Environment Agency staff undertake to interact with special interest groups and the community, what will they do and when, what are the limits / boundaries to this interaction? How will staff respond to representations?
- How can the Environment Agency's role be best explained to help special interest groups understand whether it is likely to be able to respond to their concerns?
- Outline a 'code of contact' and be proactive in the provision of information (for example, time scales): giving special interest groups information rather than letting them just 'find out' will build trust;
- Consider which would be the best formal methods of deliberation with special interest groups and other stakeholders. How should these be set up and communicated?
- How might the Environment Agency facilitate contact between stakeholders?
- How might the Environment Agency monitor the success of its engagement with stakeholders?

Planning a strategy to cover these areas will clarify what special interest groups can expect. It will also facilitate a consistent approach within the Environment Agency both on particular issues and between issues.

8.4 Benefits of early visibility

In the interviews and workshops, staff recognised the value of having a strategy and the benefits of making that strategy visible at an early stage. In cases that are likely to be contentious this means engaging with special interest groups before positions become entrenched.

We hear what you say, we recognise that what you think is a total reality for you, but there are other viewpoints as well. If you can find some way to mediate... but very often we don't. It's too compressed, too acute, moving too fast. It's really hard in war to sort these things out. You need to do it in peacetime.

(Environment Agency Interviewee #7)

Clearly building relationships in communities where there is no apparent need to do so may seem an unnecessary use of resources. Some staff noted the potential dangers of engaging with stakeholders too early. It was suggested that early visibility could have the effect of generating conflict where there was none, raising the question whether the Environment Agency should interact with special interest groups and risk developing conflict if there is no vociferous opposition to an issue. Early engagement with the community may be followed by conflict but of course, it is not possible to say that this would not otherwise have occurred. Other staff recognised the value of the Environment Agency building partnerships and establishing trust in less conflictual situations; these were seen as hugely valuable assets or resources to draw on if the situation became more contentious. Documented experience also suggests the dangers of neglecting early engagement because there is no visible special interest group opposition.

'Never assume that the absence of militant action groups – or even an immediate response means acquiescence. Dormant or suppressed opinion can erupt violently at an embarrassingly late stage of the project' (Twigger-Ross and Smith, 2000)

There are considerable dangers of generating or exacerbating conflict if people perceive that they have too little time to think about the issue or that they have been consulted when the decision has already been made. It has been noted that the public adopt a more measured – as opposed to reactive – approach to information they receive, when they have plenty of time to consider it (Burningham, in preparation; The Joining Up Project Team, 2000; Delbridge *et al.*, 2002). Where people do *not* have time to consider an issue, they are more open to emotive appeals and likely to become suspicious of evidence being presented to assuage their concerns. This has clear implications for the way in which information should be shared with special interest groups. Conflict caused by late communication of information is avoidable, so developing a strategy for communicating with special interest groups as far as possible in advance of the engagement itself is likely to be helpful.

From a special interest group point of view it would not seem unreasonable to interpret early silence as an attempt at a cover up to simply impose changes upon the community. It is unsurprising that it may prompt highly visible reactions from special interest groups who feel they have no time to pursue the issue through lobbying

channels. The interviews with special interest groups produced many examples where protests and concerns were greatly exacerbated when people believed that the Environment Agency had an agenda that they had not shared or been explicit about. Burningham (in preparation) argues that a more obstructive and reactive stance can result from a perceived lack of involvement.

Of course early visibility is not desirable in and of itself. It is quite possible to be visible for the wrong reasons. The argument here is that the Environment Agency should develop a strategy for engaging with special interest groups early on and that this should be communicated promptly. Sometimes the Environment Agency's visibility around an issue may stem from the relative invisibility of other parties. It may be helpful for it to delineate clearly its own areas of responsibility and make other bodies – for example, local authorities or health trusts – visible by explaining where its remit ends and that of another body begins. If the Environment Agency is not the 'legitimate' sounding board for an issue, then it should make sure that the appropriate people (local council, site operator, etc) are involved.

8.5 Knowing the stakeholders

Clearly one prerequisite of a strategy to engage with special interest groups is to identify them in the first place. Some of the Environment Agency's research touches upon the process of stakeholder identification. This suggests that in principle the Environment Agency is keen to involve all 'relevant' stakeholders in any decision situation (Christie and Jarvis, 2001; Environment Agency, 2002). There are however, pragmatic constraints, which mean that it has to prioritise which stakeholders to involve (Clark *et al.*, 2001; Twigger-Ross and Smith, 2000).

Participants are often chosen from interest positions that the decision maker considers to be relevant... (Petts and Leach, 2000)

Stakeholder involvement is central to the Environment Agency's commitment to encouraging participation and to demonstrating willingness to engage with special interest groups. However the grounds upon which stakeholders are identified, and the kinds of accountability to each of them, are often unclear (Bell and Gray, 2002). Knowing who the relevant special interest groups are, how they link with other groups and sections (?) of the community, what they are working towards and what their interests and opinions are, is likely to make engagement more effective. Other contextual factors that may be relevant to discerning and understanding the positions of special interest groups are the history of the area, local politics, local industries and the reliance of the population upon the local economy. It would be useful for the Environment Agency to learn what key opinion leaders in the community are saying. A strong recommendation from this research is that the Environment Agency should explore ways of enabling staff to learn from the experiences of other staff about the ways in which they have engaged with stakeholders (see Chapter 9) and the sort of groups that have been active around similar issues.

As noted above, the Environment Agency has a preference for engagement with some sorts of special interest groups. Staff should therefore be aware that it may be difficult for new or less organised groups to establish lines of communication. Staff should

develop clear strategies to actively seek out the individuals and groups that they understand least. At workshops, staff noted the way in which certain minority groups were hard to access but that it was important to engage with those that were not able to make their voice heard.

8.6 Be open and honest

Being open and honest is a necessary but possibly not sufficient precondition of effective engagement. It is necessary because if people feel that they are being kept in the dark it is likely that trust will be eroded. It is not the case, however, that informing people of the perspective of risks and benefits or of the nature of the planned engagement will necessarily ensure the desired outcome. It may be that the Environment Agency perspective is at variance with that of the community. Equally it may be that, either as a function of the content of the communication or as the result of people's previous experience of the institution, the communication is not believed. Alternatively, it may be that a communication, although intended to be open and honest, is unclear or not communicated at the right time to the right people. Other Environment Agency research has drawn attention to the problems that may be generated by 'being open.' Where the Environment Agency publicised its views in advance to aid discussion, it was criticised for having made up its mind and for deliberately publicising its views in advance to put people off from attending a public meeting (Twigger-Ross and Smith, 2000).

Although it is important to be open and honest at the start of the engagement process this remains the case throughout. It is crucial that people are kept up to date with how events are progressing. Environment Agency reports have previously noted (Twigger-Ross and Smith, 2000) that once the public has become involved in an initiative, it is vital to ensure that all interested parties are both informed and up to date on project development, otherwise uncertainty may lead to amplification / exaggeration of the slightest 'risk' involved in a project (ILGRA, 1998; Pidgeon, 1997).

One dimension of being open and honest is for to explain to special interest groups and other stakeholders what the Environment Agency can – and will - be open about. Time lines can be used to explain what the Environment Agency can be expected to do and when. The limits of Environment Agency powers can be explained alongside the role that other agencies have – or have had – for example, in relation to the planning process. It is also important for staff to communicate what they *cannot* be open about and why this is so, for example, why some issues are confidential.

It is also vital that open and honest communications take into account the perspective of the recipients. The representative of a flood action group explained this in relation to the different perspectives on a flood defence project being delayed.

'I think a very major message that I hope you'd be taking back is that there needs to be complete candour in presentation. So if you're traumatised and not able to get insurance and things like this, it is not helpful [for the Environment Agency] to say 'oh [the project] has not been withdrawn, it's having further work'. To the insurance industry it's been withdrawn: there's nothing on paper, it's withdrawn – full stop'.

(Lewes Flood Action Group)

This programme of research has revealed two main areas where particular attention should be given to being open and honest with special interest groups:

The relationship with industry

It is clear that for the smaller special interest groups this area is critical and that their belief that there is an inappropriate relationship between the Environment Agency and industry can contribute substantially to a loss of trust. It was certainly the case in relation to a contentious industrial licence application in Westbury that the Environment Agency's firm regulatory action when the company broke the licence conditions was vital in winning local confidence. The lesson learned here was that enhanced communications and consultation have to be backed up by strong regulatory action. Certainly staff often expressed the view in the workshops that there should be a greater willingness to prosecute.

The extent of the Environment Agency's powers

A common theme in the interviews with special interest groups was that more was expected from Environment Agency staff than they are willing or able to deliver.

...I think the key thing that people wanted from the audience was, well we want to talk about the health impacts, and the person from the Environment Agency said that that's not my job, that's your local authority. And you felt this real sense of well, tell us who we should be talking to, so there is an almost sense of frustration from this meeting.

(Friends of the Earth – Local)

Part of the solution to this may well be to be very explicit about the constraints upon the Environment Agency's action. Another possibility is to draw the attention of special interest groups to the ways that *they* are most and least likely to be able to make a difference. Although the value of steering special interest group activity in this way was noted in some of the workshop sessions, it was also acknowledged that this could impact on relationships with industry.

8.7 Talk with, and listen to, special interest groups

Throughout the cycle of engagement with special interest groups it is clear that one of the main conditions for developing a good relationship is to talk with them and to listen to them. Although the evidence of the workshops suggests that this is widely accepted, the interviews indicated that many special interest groups did not experience this.

Certainly several of the groups interviewed suggested that the Environment Agency needed to improve in this area as a genuine endeavour to hear them rather than as a public relations exercise. In some instances it may seem self-evident to staff that everyone will benefit from their actions (e.g. from flood defences) and therefore that everyone will be happy. But in these situations it is important to find out what people actually think rather than assume there is agreement.

The aim of talking and listening should not be to inform groups about planned actions. The first objective for staff should be to understand the issue and why special interest groups are interested in it. It is important to judge each issue and each special interest group on its own merits.

If groups have different goals, this will place greater demands on staff and require different responses. Thus it is important for them to understand the nature of special interest group concerns. For instance, if a group is particularly concerned about gathering support, staff may wish to contest the information it is using to do this. This is not simply a question of how best to react; an appreciation of the group's goals and motives should also inform proactive efforts to build more effective relationships and circumvent potential difficulties.

8.8 Use other expertise

Associated with the need to be clear about its own role and remit, it is important for the Environment Agency to facilitate opportunities for other organisations to make clear *their* responsibilities. For example, if there is a public meeting health professionals should attend in order to answer queries on health impacts. The Environment Agency should encourage appropriate involvement by all relevant parties – e.g. operators, local authorities – and to identify with them potential overlaps or gaps in responsibilities as well as outlining exactly 'who does what' in a given situation.

The suggestion was made in the interviews and the workshops that there is some value in the Environment Agency exploring ways in which it could encourage industry to build better relationships with special interest groups.

Good contact with other organisations could help staff identify people who might if necessary act as intermediaries between special interest groups and the Environment Agency. Certainly local politics can play an important part in interactions, as local MPs and councillors can be valuable allies – or difficult opponents – and they can often be found on both sides of a contentious issue. Divided elites and shifting political alliances can also lead to political opportunities for special interest groups. Access to these discussions is easiest for well-established formal groups, and much more difficult for informal or novice groups. As the more formal and better resourced environmental groups tend to be larger national ones, smaller local groups are likely to find their 'political opportunities' few and far between.

Staff recognised that building links with elected representatives could be valuable especially as they almost inevitably became involved in more contentious situations. They may be useful allies in enhancing the Environment Agency's reputation as well as disseminating information to the wider community.

If this is a group of people who've got a serious concern then they've got to have a serious involvement in it, and what you can then find is you can...focus in and use that elected representative connection to...to communicate...what it is that the [Environment] Agency wants to communicate.

(Environment Agency Interviewee #6)

As part of developing an early engagement strategy, staff will need to find out about the local political structure: local Parish Councils, local members of the European Parliament and MPs. They will also need to decide who should be contacted or consulted, enquire about local venues for public meetings and make contact with the local Area Health Authority and Planners.

8.9 Disengagement

Engaging with interest groups is a routine task for Environment Agency staff. Disengagement is part of the process of engagement but only happens when the engagement ceases to be worthwhile. This report has suggested that engagement with special interest groups has the potential to be more worthwhile than has been widely realised. However, it is still important that staff are aware that they have the option to systematically disengage from special interest groups if necessary and that they have the confidence to do so.

The Environment Agency is concerned to 'optimise' its engagement with special interest groups, i.e. to minimise its costs and enhance its reputation, legitimacy, and productive relationships in both the short and longer terms. Its dilemma is that the short-term savings of money and time that may be achieved by early disengagement may sometimes incur longer-term costs in terms of reputation, legitimacy, and productive relationships. The dilemma is greater to the extent that the Environment Agency moves away from seeing itself (and being seen by its political masters) as strictly a regulatory agency. It is important to consider both how cutting off communication and how *not* disengaging might affect its reputation. The calculation of the costs of disengagement is far from simple, and the decision to disengage is therefore a policy or management decision of some consequence.

The desire to disengage from relations with a special interest group (or an individual) generally stems from the Environment Agency becoming aware that the relationship is unproductive and is thus wasting resources. It may be that explanations of the relevant science are consistently rejected and that there are no resources to deal with the volume of repetitive communication. It may also be that the Environment Agency has fulfilled its statutory requirements and further engagement cannot be justified in relation to other priorities. This severing of ties may be strongly resisted by some individuals.

Much of the discussion in the interviews and workshops about the need for disengagement centred on dealing with 'vexatious correspondence'. A protocol for dealing with this has been developed since the time of this research. At the time however these 'low level', non-confrontational forms of action by special interest groups were viewed by staff as especially demanding. Telephone and letter-writing campaigns were seen to be difficult to handle and to tie up resources of staff and time. This was particularly the case where special interest groups campaigned especially tenaciously, or repeated arguments.

But sometimes you get... no matter how many times you answer a particular question... it just comes back in a slightly different form, but having no recognition that there's been an answer given before.

(Environment Agency Interviewee #1)

Letter after letter with new points, trying to constantly wear you down, play off one against another, writing to different people. That kind of guerrilla warfare. It's quite tiring if nothing else.

(Environment Agency Interviewee #7)

It seems that although direct action protest is occasionally unpleasant or stressful, it is not common for staff to encounter it. Furthermore, direct action protests do not at present seem to disrupt work as much as the constant 'drip drip' of telephone and letter-writing campaigns. These tend to be stressful because they are time-consuming, repetitive, wearing, a distraction from what (some) staff think they ought to be doing, and a drain on resources. It is acknowledged that there are no easy answers to dealing with these kinds of strategies, and that sometimes simply cutting off communication is the best option.

Interviews suggested there could be benefits of not continuing apparently unproductive interactions but also recognised the dangers of doing so. It was acknowledged that 'closing down' communication needs to be handled carefully and also that it could often be counter productive insofar as it might lead the special interest group representative to appeal to a higher authority in the Environment Agency. Instances where this had happened were considered to have undermined the position of staff, particularly when senior staff re-opened communication that had been closed down by frontline staff. Closing down communication also risks damaging the Environment Agency's reputation, as special interest groups that are 'cut off' may accuse it of being unresponsive or dismissive.

Wasting the Environment Agency's time can be part of a deliberate strategy for some interest groups or individual activists. One dilemma facing staff is how to tell what motivations underlie communication from special interest groups. Having clearer guidance about what forms of communication the Environment Agency can reasonably provide could give staff confidence to disengage without having to assess the special interest group's motives. Such confidence is likely to be undermined unless senior staff are also supportive in the implementation of this guidance.

In conclusion, it is very likely that in some local cases, there is little or nothing to be gained from protracted engagement with special interest groups on issues where the Environment Agency's position is clear and has already been unambiguously explained. Disengagement in such a situation is a viable option especially if it can be achieved without exacerbating conflicts. Our research, however, has suggested that there are levels at which *increased* engagement with special interest groups appears to be desirable. This would build upon existing (if often latent) goodwill, and might produce benefits for the Environment Agency in terms of achieving its stated objectives as well as enhancing its reputation and legitimacy in the eyes of the general public and, perhaps especially, with elite decision-makers and opinion-formers. The representatives of Friends of the Earth and RSPB we interviewed both indicated a desire to work more closely with the Environment Agency, albeit in rather different ways, as would be expected given their respective objectives. The same is probably true of other larger national special interest groups.

Any enhancement of the Environment Agency's standing with national special interest groups would very probably have some effect at local level insofar as communication in even the most formally decentralised national groups tends to be predominantly top-down. We would not, however, overestimate the potential of this for defusing local conflict. Locally contentious issues often do not begin with or more than peripherally engage national special interest groups, but are mainly instigated by local people provoked by the proposal for or existence of a locally unwanted land use. Most of the people involved will have had no prior contact with environmental special interest groups and may well draw more upon formal, representative institutions or elected representatives to whom the Environment Agency will need to respond. So engagement at local level is inescapable and disengagement is fraught with potential difficulties and (especially longer-term) costs.

8.10 Overview of implications

- There is value for the Environment Agency in national staff cultivating potential friends and allies among national special interest groups;
- Plan engagement strategies with special interest groups – and other stakeholders – and put them into practice early;
- Accept that you will have to engage with often irksome local representatives or institutions;
- Recognise that informal local special interest groups may often have good links (actual or potential) with formally representative institutions; and
- Under some circumstances the Environment Agency may choose no longer to engage with a particular special interest group. It is important to be open to the possibility of re-engaging if the situation changes.

9 Resources and recommendations

9.1 Introduction

Each chapter of this report has outlined a number of findings and recommendations. By and large these can be incorporated into current practice by individual staff members and local teams. It is vital that local staff are supported in developing strategies to engage with interest groups and that their capacity in this area is maintained and developed. In part this means that local staff can count on support from those at higher levels and in national roles, in an area that increasingly forms an integral part of their 'day job' (involving both engagement and disengagement from special interest groups).

This chapter presents two key recommendations that, if implemented by Head Office, will, we believe, be instrumental in supporting and developing the capacity of local staff to both plan and respond appropriately in engaging with special interest groups. These recommendations, explained in greater detail below, are:

- Development of a corporate memory: the creation of a national Environment Agency database documenting engagement strategies with special interest groups.
- Provision of expertise to assist local staff in the diagnosis of local issues

9.2 Resource implications

These recommendations have resource implications. The Environment Agency acknowledges that the resources that it deploys to engage with interest groups on contentious issues are often far in excess of those that are budgeted. The current research was commissioned with a view to reducing the resources being spent on long running conflicts and deploying them more effectively. The research team was asked to help staff understand interest groups, their characteristics and how they operate in order to assist the Environment Agency in achieving this.

We recognise that resources to implement recommendations are constrained and possibly diminishing. The Environment Agency must thus *optimise* its engagement with special interest groups. It must learn to engage and disengage effectively. Looking to balance resource allocation with developing more effective engagement strategies is complex and is not simply a matter of recommending ways in which the current resource can be reduced. In part, effective allocation involves matching resources to the situation. Optimal use of resources also demands that the recommendations implemented from this programme of research are effectively integrated with other initiatives.

We would suggest that the cost of providing for engagement on licence applications will continue to vary. Where the situation is contentious more will be demanded. The context of decreasing trust in authorities and increasing expectations of stakeholder participation in decision-making suggests that the Environment Agency will increasingly find itself engaging on contentious issues.

It is unlikely that the recommendations made in this report will save money in the short term. However, their adoption may;

- reduce the number of situations where conflict escalates and results in prolonged interaction;
- reduce staff turnover and stress; and
- reduce damage to Environment Agency reputation.

In the long term, the proposed measures may also save money. We have argued in this report that better engagement with special interest groups will help the Environment Agency improve environmental decision-making. We would therefore suggest that the costs are worth bearing.

The recommendations in this report require changes that will benefit staff across various functions and levels within the Environment Agency. The evidence of a series of workshops across the research programme also suggests that the adoption of these recommendations would demonstrate to staff on the ground that the internal culture is changing. Staff consistently expressed the wish that the value of effective engagement with special interest groups should be more clearly recognised at higher levels of the organisation. The proposed measures are likely to boost staff morale quite independently of any benefits from the changes themselves.

9.3 Detailed outline of the recommendations

9.3.1 **Developing a corporate memory: the creation of a national database documenting engagement strategies with special interest groups**

We have found consistent evidence throughout this research that staff recognise the value of being able to draw upon the experience of others and upon the work that others have done. Both in the interviews and the workshops, staff have recounted many examples of good practice regarding engaging with special interest groups. By the same token, it is also evident that staff are often unaware of lessons that have been learned and documented (to some degree at least) in the Environment Agency literature. There has also been evidence that some staff are unaware of engagement initiatives with special interest groups that are taking place in areas other than their own.

We believe that it is vital that the Environment Agency becomes an organisation with a memory. At the present time it has no mechanism for ensuring that those primarily

responsible for managing engagement with special interest groups have the opportunity to systematically capture their experience for the benefit of staff elsewhere in the organisation. The essence of developing a corporate memory is that staff experience can be recorded and transmitted in a way that is dynamic and accessible.

This is not a new recommendation. The Local Outreach report (Clark *et al.*, 2001) noted the importance of the Environment Agency systematically evaluating its local outreach initiatives.

‘Although the implementation of a central inventory of the activities and processes undertaken in different areas and contexts would be a large undertaking, without such a database it is impossible for the [Environment] Agency as a whole to even gauge the range and extent of its outreach activities.’

Our research leads us to reiterate some of benefits to the Environment Agency of implementing a formal procedure for documenting engagement with special interest groups. The development of this kind of corporate memory would:

systematically document the nature and the outcomes of both formal and informal engagement with special interest groups;

- help staff to recognise opportunities for interacting with special interest groups and to develop optimal strategies for engagement;
- facilitate effective evaluation of engagement with special interest groups;
- increase the likelihood that good practice will be learnt from, internalised and used appropriately in future;
- facilitate a consistent approach to special interest groups across the organisation; and
- inform decisions on the allocation of resources for engagement.

We believe that this should not simply focus on documenting engagement with special interest groups in relation to contentious issues. It is vital to learn from the experience of staff who have anticipated conflict and by being pro-active have reduced it. There are also many examples of good practice in more routine interactions with special interest groups that should be recorded and disseminated.

The construction of this kind of database needs to be carefully thought through in terms of who would provide information, what information should be collected, and how this information can be accessed. There would be little value in creating and maintaining a systematic record of engagement activities unless the collection, content and dissemination of the information maps effectively onto the needs of local staff. The Environment Agency should build on its previous experience of producing user-friendly national systems.

Practical questions to be considered will thus include:

- What information should be included in the database? What will be of most help to staff in other situations? The aim would be to ensure the inclusion of important information and the exclusion of peripheral information. Current case study work is likely to be of benefit in suggesting a possible template.
- Who (if anyone) should be responsible for eliciting information from local / area staff and maintaining the database. What responsibility should lie with local staff? What might be the role of those responsible for contentious issues in the External Relations Team? It might be suggested that maintaining a database should not be the responsibility of staff preoccupied with daily regulatory activities. On the other hand, there are difficulties involved with national teams chasing staff for information.
- Where does the database reside, how can it be accessed and by whom?
- How should the database and its potential value be 'sold' to staff?
- How might such a database dovetail with existing initiatives around a national contentious issues database and a stakeholder management database?

9.3.2 Provision of expertise to assist local staff with diagnosis of local issues

One observation made across the programme of research is that there is currently limited expertise within the Environment Agency for analysing and diagnosing issues around which the Environment Agency interacts with special interest groups. There are also considerable constraints upon staff time such that there is little mandate for dealing with differences and drawing on resources before an issue becomes contentious.

We suggest that, at least in the immediate future, provision of such expertise would be a valuable resource that local staff (from various functions) could call upon to assist with developing a local engagement strategy.

We believe it is critical that local teams retain responsibility and control in dealing with local issues. However, the provision of some outside diagnostic expertise could also provide valuable support and some relief from the pressures and uncertainties experienced at local level. This suggestion was outlined at the final workshop and there was some debate as to whether such a team would most usefully comprise Environment Agency staff with particular skills and experience in this area or an external independent team. There was no consensus on this point with the advantages and disadvantages of both being recognised.

In considering this recommendation it should be noted that a team with particular expertise in engaging with special interest groups could also be involved in building and maintaining the database. A further role of such a specialist team would be in horizon scanning. Their role would give them an overview of relations with interest groups and help them to identify developing patterns and trends in special interest group concerns well in advance of their actual manifestation. Thirdly, such a team would be committed to unlocking the value that special interest groups have for

improved environmental decision-making. This, rather than conflict minimisation, would be the aim. Such a diagnostic team could again be linked to, and accessed through, the External Relations Teams currently being set up. Finally, the existence of such a specialist diagnostic function should assist in avoiding sudden and reactive resource deployment.

We acknowledge that there are potential difficulties in establishing a national team to provide expertise on special interest groups. Particular thought would need to be given to staff expectations in relation to response times and to the importance of building rather than undermining local staff skills.

In conclusion, the evidence from our work suggests that the thoughtful design and implementation of these recommendations would:

- support staff at a local level in effective resource deployment when engaging with special interest groups;
- recognise the contribution that special interest groups can have to improving environmental decision-making; and
- be indicative of a culture within the Environment Agency that recognises and values staff engagement with special interest groups.

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