
Integers, integrants and normative vectors: The limitations of environmental policy integration under neoliberalism

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Abstract. Policy integration is a processes by which a particular policy, and the objectives, principles and values on which it is based, is intentionally integrated into a whole – a broader and more holistic set of policies – where the former did not previously exist. We may call this whole the *integer*, a term used in mathematics for a whole number. The integer denotes the broader set of policies of a polity or political system and the set of instruments used to promote and implement these policies. We may call that which is to be integrated the *integrant*, a term used to denote a part of a whole. The integrant may be defined as a particular policy and the set of instruments used to promote and implement that policy which, it is intended, should be integrated into an integer. So environmental policy integration is a policy process to integrate a stipulated integrant (an environmental policy) throughout an integer (a broader set of policies). Environmental policy integration is first and foremost a normative enterprise that seeks to shift the normative vector (the overall normative ‘pull’) of the integer on to a more sustainable basis. However, the extent to which environmental policy integration can be successful in doing this is limited when integrants are shaped and influenced *ab initio* by the principles and values of the integer. The paper argues that contemporary environmental policies are dominated primarily by neoliberal principles. The result is that while environmental policy integration has achieved some limited successes it is an essentially reformist approach that takes as its point of departure mainstream policies that routinely degrade the environment.

Keywords: integer, integrant, integral change, integration, participation, normative vector

Introduction

Environmental policy integration (EPI) may be defined as the aspiration and intention of integrating environmental aims and objectives throughout all policy sectors. Environmental policy should thus be seen not as an isolated policy sector but as something common to all sectors. Advocates for EPI include environmental ministries, citizens groups, conservation organisations (for example, World Wide Fund for Nature, 2013) and the secretariats of international environmental organisations. EPI is a major environmental policy paradigm, particularly in Europe (for example, Dupont and Oberthür, 2012; European Environment Agency, 2005; Hertin and Berkhout, 2010; Jordan and Lenschow, 2008; Lenschow, 2002).

The paper proceeds from the normative basis that environmental policy scholars and analysts should contribute constructively to debates on how a transition to environmental sustainability (however so defined) may be achieved. This enterprise should include the generation of new conceptions of policy and, where necessary, a critique of contemporary policy-making processes. To that end, the paper first presents a new conceptual imagination of EPI. It then examine the role of integration using forest policy as an example before considering the constraints to a more systemic integration of environmental policy in the broader structures of global governance. The role of participation in policy making is critically interrogated. The central argument of the paper is that EPI is often ineffective as it is rarely the major policy priority in broader policy systems. The objective of EPI, it is

argued, should be a major restructuring of policy in which environmental norms prevail. But while EPI often leads to positive incremental change, it fails to address the underlying causes of environmental degradation. The empirical focus of the paper is international forest policy, with particular reference to the United Nations and the Forest Stewardship Council. The paper concludes by examining the case for a World Environment Organisation.

An analytical framework for EPI

When analysing policy integration, we may ask what is being integrated and what it is being integrated into (Persson, 2007). Policy integration may be imagined as the processes by which some policies, and the objectives, principles and values on which the policies are based, are integrated into a whole, that is a broader and more holistic set of policies, where the former did not previously exist. We may call this whole the *integer*, a term that is used in mathematics to denote a whole number. The integer may be defined as the broader set of policies of a polity or political system and the set of instruments (legislation, regulation, subsidies, taxes, etc.) used to promote and implement these policies. We may call that which is to be integrated the *integrant*, a term that is used to denote a part of a whole. The integrant may be defined as a particular policy and the set of instruments used to promote and implement that policy which, it is intended, should be integrated into an integer. So EPI is a process intended to integrate a stipulated integrant (an environmental policy) throughout an integer (a broader set of policies).

Under this schema, both the integrant and integer are policy outputs and the policy instruments used to promote them. An integer may be conceived relatively narrowly (for example, as sectoral policies within a particular region) or more broadly (the sum totality of the policies generated by a particular polity, such as a local authority, country or intergovernmental organisation). Integrant and integer are not defined as a policy system or structure of governance, or the actors that comprise and contest policy systems and governance structures. Clearly, however, the policies generated by any system or structure depend in very large measure on the actors involved, the distribution of power between them and the processes used to generate and implement policy. The study of EPI thus requires a focus not only on integrants and integers as policy outputs; it necessarily requires analysis of the processes by which the one is integrated into the other, how they relate – or should relate – to each other and any trade-offs and compromises that actors make during the integration process.

The intention of EPI is never merely additive, so that the result of integrating integrant i into integer I can be expressed, say, as $i + I$. Neither is the intention that environmental policy will exist in isolation from other policies, with the integrant a bounded sub-set of the integer. The strategy of EPI is never to add environmental policy in ‘bolt on’ fashion; it is, rather, to affect some kind of qualitative change to the integer that would not have taken place in the absence of integration. That is, the integer post-integration is fundamentally redefined, with the integrant now integral to, and constituent of, a new broader universe of policy. The intention of integration, therefore, is a significant reorientation of policy that generates a qualitatively different policy integrity.

In this respect, the integrant may be compared to a catalyst in a chemical reaction, promoting change and a new chemical output without being consumed by the reaction itself. However, the analogy can only be carried so far: not only should the process of integration change the integer in line with environmental norms (which from an environmental standpoint is desirable), but some change to the integrant may also take place. An integrant may not arrive within an integer intact, in pure form; some changes to the environmental policy being integrated may be unavoidable due to political bargaining and compromise so that the intended integrant is weakened (which from an environmental standpoint is undesirable).

EPI, therefore, is a complex and multifaceted process. Attempts at EPI may target integers at a range of spatial scales, such as the local, regional, country and global levels. But because what happens at one scale or in one policy domain may impact upon others integration may encompass both horizontal integration and vertical processes (Lafferty and Hovden, 2003; Lewanski, 2002; Watson et al., 2008). *Horizontal integration* refers to integration between sectors. An application of horizontal EPI to forests would be the integration of forest conservation norms into other sectors, such as transport, agriculture or urbanisation. The direct and indirect causes of deforestation and forest degradation are often found in other sectors; hence, the widespread recognition that deforestation cannot be arrested by forest policies alone and an holistic, integrated policy system is necessary. Here forest policy is the integrant and the broader policy set is the integer, with the intention being that integration will eliminate or arrest any negative feedbacks that policies within other sectors bring to bear upon the forest issue area. The intention of EPI is thus to generate policies that will impact not only on social systems but, more crucially, on ecological systems too.

Vertical integration is integration across scales and the often complex interconnections between different levels of governance. The proximity of an actor to a particular geographical space is not a reliable guide to the influence of that actor in that space. Actors who may never have visited a space may have a direct bearing on decisions taken on resource use within it. Similarly, actors at the local level may have certain value-based preferences on how local resources should be used only to find that they cannot achieve their desired outcomes as they have less influence than other more powerful actors operating at considerable remove from the space in question, such as central government, investment banks and forest businesses. Bruno Latour (1987) has coined the term ‘action at a distance’ to describe the phenomenon whereby actors can exercise agency in spaces they have not visited and may not even have heard of (Preston, 2006).

So if a set of local actors has one desired policy enterprise, say the conservation of a local forest, they may set out to achieve this through a variety of approaches, such as restoration and conservation work within the forest. They may seek to influence other actors whose behaviours and policies may lead to the degradation of the forest. But this may be insufficient to achieve the desired results: the various decisions taken at all levels may combine to produce localised spatial effects which, from an environmental standpoint, are undesirable. Because some actors may exercise action at a distance, actors seeking to conserve a local forest may seek to lobby and influence actors in other localities, both in other sectors (horizontal integration) and other scales (vertical integration). So an effective conservation initiative at a local level, such as a village or municipality, may require not only the coalition of local actors around a particular policy enterprise; it may also require influencing those actors whose policies or behaviours, intentionally or otherwise, generate environmental degradation.

However, these other actors have their own goal-oriented objectives. While some actors may seek to conserve an area of forest, others may have very different designs: a transport ministry may wish the forest to be levelled for a motorway bypass while an agricultural corporation or urban development consortium may wish to convert it to an alternative land use. These actors too may also engage in policy integration, seeking to promote and integrate their policies into other sectors. In this respect, we may talk of, say, transport policy integration or urban policy integration promoted by those for whom forestry and environmental norms may represent barriers to desired outcomes. These actors may actively resist EPI. In short, there is no single integrating enterprise, and in this respect, environmental policy is not unique. There are, rather, different attempts to integrate different values, ideas and principles from one policy area to another. Policy integration, therefore, is not only a normative endeavour. With different integrating initiatives emanating from different policy quarters, the question then becomes, whose norms should prevail. This is unavoidably a political question.

Policy integration: A political question

Within any given integer, there are a wide range of policies, some of which may require little, if any, behavioural change from actors, while others may be broad overarching policies that impact upon most actors in a particular policy domain. Different policies may promote different, possibly competing, norms, but not all policies are equal in terms of how they shape behaviour. In order to assess how feasible EPI may be as a strategy at a given time and for a given space, it makes sense to consider the overall behavioural ‘pull’ of the target integer. We may refer to this behavioural pull as the normative vector. A normative vector may be envisaged as a conceptual aggregate, the overall direction in which an integer directs actors’ behaviour once the many different policies that constitute it, some of which may pull in different directions and thus cancel each other out, have been totalled. It is conceptually similar to the vector of a physical body that is subjected simultaneously to many forces of varying strengths from different directions. The concept of a vector thus encompasses two things: direction and magnitude. The notion of a normative vector thus denotes the overall normative direction of an integer and the extent to which policies are binding and enforced.

For example, and by way of illustration, if the level of analysis is country level, then within any given country some policy objectives (e.g. promoting full employment, cutting the public deficit, reducing inflation, fighting terrorism) may dominate the political landscape at some times but not others. A dominant policy objective will never be the only objective; there will always be others, some of which may inhibit or conflict with the dominant objective. The overall normative vector will depend on certain variables, such as any persistent problems the country faces, the ideology of the governing party, the broader international context at the time and pressure from constituents and external actors (such as the IMF, international banks and so on). A governing party will inherit legislative, regulatory and fiscal instruments from their predecessors which will provide a certain path dependence to policy. They will retain some policies, overturn others and introduce new policies. So at any one time, the normative vector of an integer is the product of the historical and current priorities of those actors that wield political power in the policy process and the discourses and ideologies these actors used to promote, support and legitimise their policies. The normative vector of the target integer will play an important role in determining how successful the integration of environmental policy is likely to be.

We may distinguish between two ideal type relationships between integrant and integer. The first is *normative congruence*: a situation where the norms of the integrant are congruent with the normative vector of the integer, so that realising the objectives of the former enhances, or at least does not inhibit, the realisation of the objectives of the latter. In such a situation, we can expect the integer to be receptive to, or at least not resistant to, the integrant. The second relationship is one of *normative incongruence* a situation where the norms of the integrant collide with the normative vector of the integer, so that realising the objectives of the one will necessarily impede the realisation of the other. In such a situation, we can expect the integer to be resistant to the integrant.

Clearly EPI is most like to succeed where the integrant–integer relationship is one of congruence rather than incongruence. A simplified example: let us suppose that the dominant norm of a set of policies (the integer) is forest conservation, and that the norm of the policy to be integrated (the integrant) is bird conservation. As many birds live in forests, measures to conserve the one will also serve to conserve the other. This is a case of normative congruence. However, if the dominant norm of the integer is short-term maximisation of timber yields and that of the integrant was long-term forest conservation, then a state of normative incongruence would exist. Effective policy integration will be difficult as actors supporting the normative vector can be expected actively to resist integration. As ideal types, the categories of normative congruence and incongruence may be seen as two poles on a

continuum between which there is an intermediate area where neither outright congruence nor incongruence exists.

Much depends on the details of the policies of integrant and integer. There is no single environmental policy, rather many different potential policies that vary significantly in terms of values, objectives, winners and losers. The details of forest policy may vary considerably. Deep green ecologists (Naess, 1989) or strong preservationists may argue that environmental norms should always prevail and should not be bargained down and diluted through political bargaining with other interests. On this view, any forest-based policy should be guided only by the imperative of conserving forests.

Some degree of normative incongruence would arise if an attempt was made to integrate an environmental policy integrant based on deep green norms into an integer where dominant policy norms allow some conversion of forests to alternative land uses. Normative incongruence may still occur, but is less likely to do so, when EPI is driven by weaker norms, such as a more 'light' green perspective whereby trade-offs between economic and developmental objectives on the one hand and environmental objectives on the other are considered acceptable. So the different norms of the integrant and the integer are central in determining whether normative incongruence is likely and, therefore, how effective EPI will be.

The intention of EPI is to move from fragmented and disconnected policy making towards a qualitatively different policy system focused on the pursuit of environmental norms. Even where normative incongruence is not inevitable, conflict between actors may arise over the fine-grained details. For example, there are many different ways in which any given policy may be implemented. Who, then, has the power to implement their vision of EPI? Should EPI be driven by local communities, by national government or through other more deliberative processes? To what extent are trade-offs acceptable between environmental and non-environmental objectives? Actors who may stand to win from EPI, or who believe it to be morally right, will support EPI, but we may posit that such actors are usually in the minority or relatively powerless: were it otherwise then we would expect environmental policies already to be the dominant force guiding the normative vector of the integer.

Proponents of EPI thus begin from a position of structural weakness, a position that may be difficult to reverse as actors who perceive they may lose from EPI will resist integration. One factor that determines whether EPI is likely to be successful in meeting its stated objectives is the power of the proponents of the environmental policy relative to rival policies. Powerful actors may prevent the adoption of environmental policy. Even if they cannot they may be able to contest the details of policy implementation, impeding effective integration throughout the integer, with the result that the environmental policy fails to achieve the required change of direction of the normative vector and instead becomes a symbolic and isolated policy with little or no independent normative pull.

Indeed, it is precisely because powerful actors in business have the ability to resist and thwart environmental policy that the promotion of environmental objectives continues to be framed as one of integration (Falkner, 2008). A frequently used synonym in the environmental policy literature is 'mainstreaming' (for example, Wellstead et al., 2014) a term that denotes that environmental policy is not a central concern of government and other actors but that it should become so through integration into macroeconomic policies, investment and economic development. Because environmental policy, nature conservation and sustainability have historically been incongruent with the normative vectors of most policy systems those actors who promote conservationist norms have come to promote their objectives in terms of integration into sectors that attract more government funding and are supported by more powerful political interests, such as industry, agriculture and transport.

And those actors who benefit from these sectors generate the broader policy context through which those promoting environmental norms must seek to work in order to achieve EPI.

As with all generalisations there are exceptions, and this generalisation does not hold true for every geographical space. EPI can be successful and may lead, for example, to the creation of protected areas. The creation of a protected area creates, both geographically and metaphorically, a new policy space. Within this space, the dominant objectives will be, say, conservation, sustainable management, enhancement of biodiversity, and related objectives. Within the boundaries of the protected area, the normative vector is defined by conservationist norms with other policy objectives secondary. Those sectors that seek to promote alternative land uses – for example, the construction of a motorway or a high speed rail link – would, in effect, be seeking to promote a non-environmental integrant into an environmental integer.

Yet except when talking of global governance in its very broadest sense (a subject that is considered below), no policy system exists in isolation; different integers may be interconnected through horizontal and vertical processes. Within the boundaries of the protected area, one policy system and one dominant authority may apply, yet outside it protected area policy is situated within the broader integer of national socioeconomic policy. So protected areas continue to be politically contentious spaces, contested by actors whose objectives are not necessarily driven by environmental values (Brockington et al., 2008; Child, 2004). Again it is apparent that the proponents of environmental policy have no monopoly on integration; rather there are many, often conflicting, integrating enterprises. This point is developed later in the section ‘EPI, international forest policy and neoliberalism’. First, however, attention turns to a subject that is increasingly central to debates on EPI; participation. This subject is discussed with reference to forest policy.

Participation and EPI

The notion that participation is essential to effective EPI is often taken as a given and only rarely subjected to critical interrogation. Participation, it is often argued, is necessary on democratic grounds so that the views of all necessary stakeholders can be heard and taken into account in the policy-making process. From a normative standpoint there are strong arguments for and against such a proposition. In favour, participation – both horizontally to include relevant sectors and vertically to embrace a range of actors at the sub-national level – may realise a stronger and more inclusive policy (Brown et al., 2005: 447). Furthermore, the degradation of the forest resource base is often a consequence of local communities losing ownership and control over their resources to powerful outside interests, what may be seen as a tragedy of open access leading to the undermining of local commons regimes (Ostrom, 1990).

Realising the long-term conservation of public goods may be undermined when actors with an interest solely in maximisation gains from short-term private good exploitation are admitted, or can force access to, forest spaces. A participatory integratory process that admitted a timber corporation intent on clearfelling a forest rather than managing it sustainably would be difficult to justify in terms of environmental norms. Actors from outside the forest who seek to profit from forest exploitation often have significant power relative to those who seek to conserve forests (for example, Burgess et al., 2011; Campara, 2005; Nygren, 2000), and admitting the former to a policy process on the basis that this is desirable as inclusiveness may negate the efforts of the latter. It is possible that an EPI process generated from a process with a strong degree of participation and which exhibits a strong degree of integration between integrant and integer may degrade the resource base because the EPI process has been captured by actors motivated by unscrupulous resource exploitation rather than by a conservationist ethic. Often, therefore, tragedies of the commons are a consequence of the participation of the powerful (The Ecologist, 1993).

Larger groups tend to have a greater heterogeneity of preferences compared to smaller groups and are less likely to agree shared goals (Downs et al., 1996). As Brown et al. (2005: 448) note,

policy integration has strong potential for conflicts of interest due to the demanding and multidimensional goals ... It certainly cannot be assumed that finding win-win solutions can always be realized and any conflicts between different goals can be resolved to the satisfaction of all relevant interests.

So the more socially differentiated the actors in, or contesting, a policy system the more complex the mix of interests and values and, therefore, the less likely it is that participation will generate shared agreement on outcomes. If the intention of EPI is to achieve environmental conservationist objectives – and that surely must be the primary basis for judging the success or otherwise of EPI as a normative endeavour – than the challenge would seem to be to ensure that the policy process is expanded to admit all actors who have a vested interest in conservationist norms, while excluding, and limiting the influence, of those actors whose actions would degrade the resource base. In principle, therefore, effective EPI may run counter to the inclusive ethos of participation.

Against this it might be argued that admitting into a policy system actors who are not motivated by environmental values will subject them to a process of normative socialisation that, over time, will generate behavioural change as the laggards adopt the shared norms of the group. On this view, participation can enable the transmission of desirable norms between actors. There is considerable evidence that normative socialisation can take place in the forest and timber sectors, with many businesses prepared to adjust to the requirements of well-managed, or sustainably managed, forests. The case of the Forest Stewardship Council (FSC) is illustrative: many actors have been prepared to adjust their behaviour in line with the FSC's principles (Cashore et al., 2004; Gulbrandsen, 2004).

However, from an environmental standpoint, normative socialisation need not necessarily be positive. Participation and policy integration may inject a range of different values and ideological principles into policy making, not all of them desirable. There is a risk that admitting actors who do not share the norms of the group can dilute, or contaminate, those norms. If in any integrated process the preferences of all actors are treated the same without discrimination, then admitting environmentally unscrupulous actors will result in suboptimal outcomes. Much depends on whether participation carries with it the opportunity to qualitatively shape the norms and standards of the group. Again the case of the FSC is illustrative: while the FSC is prepared to admit any actor that declares its support for the goal of improving forest management, it is not prepared to negotiate on its standards. While the FSC recognises the merits of participation, it is not driven by any notion of integrating the preferences of all comers; it is first and foremost a normative organisation, and its standards are not negotiable.

This suggests that full participation is not necessarily desirable: participation should be selective and there should be criteria for inclusion. Participation is a means-based objective, while environmental conservation is judged in terms of ends. Strong and enforceable policies for the environment are more desirable than an holistically integrated or fully participatory process in which actors with a stake in environmental degradation are represented.

The principle of participation is now a central one throughout the United Nations system. For example, the United Nations Forum on Forests (UNFF) has sought to promote participation and to ensure that the voices of more affected parties are heard in multistakeholder dialogue segments when the UNFF meets. Consistent with UN accreditation procedures, eight 'major groups' have been admitted to these dialogues: business and industry, children and youth, farmers and small land owners, indigenous peoples, NGOs, science and technological communities, women, and workers and trade unions. However, multistakeholder dialogues

have had mixed results in integrating environmental norms into the UNFF. First, the dialogues admit a range of actors with interests in forest conservation and use, placing business and industry on an equal status alongside indigenous peoples. No distinction has been made between actors that may play a role in exploiting the resource unsustainably and those that wish to conserve it. The response of some indigenous people has been that the allocation of their rights should be seen as higher than mere equality with business and industry (Humphreys, 2006). Second, there is no mechanism by which the outcomes of multistakeholder segments can feed into UNFF mainstream decision making. As a policy integration mechanism multistakeholder dialogues are, it may be concluded, flawed in both conception and execution.

Policy integration is also an approach that finds support throughout the UN system, appearing in soft law and policy guidelines adopted since the 1992 United Nations Conference on Environment and Development (UNCED). To give just two examples on forests: in 1997 the Intergovernmental Panel on Forests recommended that ‘National forest programmes should be implemented in the context of each country’s socio-economic, cultural, political and environmental situation, and should be integrated into wider programmes for sustainable land use’ (United Nations, 1997: para. 8). Ten years later, the *Non-Legally Binding Instrument on All Types of Forests* of 2007 (which in 2015 was renamed the *United Nations Forest Instrument*) stressed the need to ‘implement measures to enhance cooperation and crosssectoral policy and programme coordination among sectors affecting and affected by forest policies and management, with a view to integrating the forest sector into national decision-making processes and promoting sustainable forest management’ (United Nations, 2007: para. 6(k)).

However, such mentions in UN declarations are rarely accompanied by any elaboration on how integration should take place. Integration is essentially an aspirational goal.

This section has suggested that there is no basis in policy theory or practice for concluding that a broad process of inclusive participation will necessarily generate environmentally desirable outcomes. It may do, but this should not be an *a priori* assumption. This argument is returned to in the next section, again using international forest policy as an example.

EPI, international forest policy and neoliberalism

Integers, it has been suggested, occur at a variety of spatial scales, ranging from the local level, through national policy, to the global level. An integer is guided by a normative vector, namely the dominant normative direction of travel of the policies of the integer.

So far the focus of the paper has been on the process of EPI. The argument has assumed that there are pre-existing environmental policy integrants which policy makers seek to integrate throughout a broader integer. In this section, we shall take a step backwards and consider the broader influences that have a bearing upon the environmental policy formulation process. Here, an important analytical question is whether, and if so to what extent, the normative vector of the integer contributes to environmental policy formulation before EPI.

In order to pursue this question, the focus of this section will be on policy in the broadest possible sense, namely the overall normative vector of global governance. One of the main factors that shape the normative vector of an integer is the law, and in particular the rights that the law upholds. Global governance is guided by international law, which falls into three main corpora: human rights, the global economy and the environment. Of these the most influential in normative terms is international economic law on trade, investment and intellectual property rights.

There is a growing literature which argues that the global economy and environmental governance are now dominated, and have been since the mid-1980s, by neoliberalism (Colás, 2005; Crouch, 2011; Harvey, 2005; Himley, 2008; Mirowski, 2013; Toke, 2000).

Neoliberalism, which aims to protect the rights of capital and investors, is the dominant policy discourse of our age, emphasising market-based solutions, an enhanced role for the private sector, a reduced role for public sector legislation and regulation and an emphasis on voluntary initiatives. The term discourse is used here in a Foucauldian sense as a more or less coherent set of ideas and understandings that shape and structure how people think about and interpret the world (Foucault, 1994). The discourse of neoliberalism may be seen as the dominant normative vector in global governance, in that most policies are, to greater or lesser degrees, influenced by it.

This raises an interesting but important analytical puzzle which can be expressed thus: if the intention of EPI is to integrate an integrant of environmental policies and values into a broader integer which, it is intended, should then be reoriented in line with environmental norms then at what point in this process does neoliberalism first have an impact? Two theoretical possibilities may be posited. The first is that neoliberal norms do not influence the initial stages of environmental policy formulation. On this view, the initial integrant is pure environmental policy, unmediated by other norms and values, with neoliberal norms interacting with environmental policy only during the process of integration, perhaps when policy makers negotiate the implementation of the policy. The second possibility is that neoliberal norms influence and shape environmental policy *before* it is integrated throughout the broader integer.

The first, while possible in principle, would require policy makers to make environmental policy in a vacuum, paying no attention at all to the broader policy context. This seems unlikely, suggesting that the second is the more likely possibility. Indeed, the empirical evidence supports this. For example, the *UN Forest Instrument* on forests contains provisions to 'encourage private sector investment' and to 'create an enabling environment for forest investment' (United Nations, 2007: para. 6(h) and para. 6(n)). The same instrument also mentions 'promoting international trade from sustainably managed forests' (para. 6(g)) and 'voluntary instruments, such as voluntary certification systems' (para. 6(x)). So while the purpose of the UNFF and its predecessors is to agree international forest policy, neoliberal principles appear during the negotiation process. States seeking to implement, say, the *UN Forest Instrument*, into national forest policy will not be implementing pure forest policy but what we may call neoliberal forest policy.

Those who see neoliberalism as the most significant contemporary normative force in environmental politics argue that environmental policy is routinely shaped by neoliberal policy principles, establishing the parameters to what is admissible in environmental policy. The result is the neoliberalising (Castree, 2008a, 2008b) or, alternatively, the neoliberalisation (Heynen and Robbins, 2005; Himley, 2008; Humphreys, 2009; McCarthy and Prudham, 2004) of nature. Given that a major ideational driving force of environmental degradation is neoliberalism, which legitimises the often unregulated activities of businesses in forest spaces, the neoliberalisation of environmental policy is deeply problematic. If environmental policy has itself been shaped *ab initio* by the very same ideational forces that give rise to environmental degradation then EPI, it can be argued, is inevitably destined to fail. In other words, if neoliberalism has already set the parameters for environmental policy, delimiting it prior to integration, then even the most effective EPI process will be fatally weakened as it will have been deprived from the outset of any transformatory potential.

Such a process, it may be argued, has occurred in international forest policy, with the emphasis on voluntary, non-binding, private sector and market-led responses to deforestation. If EPI is an example of the integration of an environmental policy integrant into an integer, the expression of neoliberal principles in international forest policy illustrates how the principles of the neoliberal integer shape, and thereby weaken, the normative intent of the integrant prior to integration. In such cases, the scope for effective EPI leading to a change in the normative vector of the integer are, inevitably, severely limited.

The problem of normative incongruence between neoliberalism on the one hand and environmental objectives on the other is not even acknowledged as a theoretical possibility in international environmental negotiations, still less addressed. For example, international forest negotiations have concentrated on crafting compromise language that covers up normative and political conflicts. International soft law on the environment, such as the *UN Forest Instrument*, has emerged as a hybrid of neoliberal policy principles and other discourses on the conservation and sustainable management of forests. Ideas become more powerful as organising principles the more spaces they occupy and influence, and neoliberalism has achieved its dominant role in global governance by shaping and guiding policy formulation in many different political spaces.

It is here that participatory processes may be problematic. The more participatory a policy formulation process is, the more likely it is that powerful political and economic actors that support neoliberal policy principles will be admitted to the policy process and be able to shape the integrant according to neoliberal principles. Indeed, neoliberalism has been systematically promoted by powerful proponents such as developed world governments, transnational corporations and investment banks. As a result, it has found expression within a broad range of environmental policies. For example, forest-related policy outputs routinely mention the needs for private investment, market-based solutions (such as carbon trading and certification) and voluntary measures to address the international trade in illegally logged timber (Giessen, 2013; Humphreys, 2011).

This suggests a need to consider the role of neoliberalism in shaping both the broad structures of global governance in general and environmental policy in particular. Neoliberal principles are omnipresent throughout global governance but arguably the loci of neoliberal power in global governance are the international financial and trade organisations: the World Bank, the International Monetary Fund and the World Trade Organization (WTO) (Peet, 2003). Of these the WTO is the most important. Stephen Gill (1998) argues that the WTO promotes a 'new constitutionalism' that upholds the rights of investors and business. The WTO promotes investment liberalisation (the right of an investor in one country to invest in any other) and trade liberalisation (the right of a business in any one country to trade with any other). A range of international agreements on international trade, investment and intellectual property rights have now been consolidated under the auspices of the WTO. To Gill, this is akin to a global constitution, but unlike national level constitutions, which specify the rights and liberties of people, the WTO codifies investors and business rights. Alston (2002) argues that 'any such rights arising out of WTO agreements are not, and should not be considered to be, analogous to human rights'. They are first and foremost the rights of private corporations and investors.

The WTO has a stronger normative force in shaping the behaviour of states and businesses than international environmental law as it has tougher enforcement provisions. States have given the WTO the authority to require changes to national law consistent with WTO rules on pain of sanctions. Few international environmental agreements (the Montreal Protocol is one example) have such strong provisions. The WTO also has procedures for resolving any disputes over the interpretation of any conflicts that may arise between WTO agreements.

Integrating environmental standards into the WTO has achieved modest success. In the context of the WTO environmental standards have tended to be viewed as barriers to trade although the WTO does permit trade-related measures to protect the environment that meet the WTO principle of non-discrimination between states and apply equally to all states (Shaffer, 2001). However, the WTO does not permit states to discriminate between goods on the basis of their manufacture; so no state can decide to import, say, sustainably managed timber (however defined) but prohibit the import of unsustainably managed timber. The strength of the WTO in relation to environmental law forms what Gill (1995, 2002) views as

an example of the ascendancy of the rights of businesses and investors over human rights or the right to a clean environment. To one international lawyer (Tarasofsky, 2005), the WTO 'is perhaps the strongest inter-State judicial dispute settlement mechanism in existence'. All significant international instruments on trade, investment and international property rights have been consolidated under the auspices of the WTO. In distinction, responsibility for implementing international environmental law is scattered over many organisation.

Overall EPI at the international level has had limited success. Actors promoting EPI may encounter structural resistance to environmental objectives from actors that have a vested interest in retaining the status quo (Briassoulis, 2005a, 2005b). Environmental policies have been integrated into one of neoliberalism's main international institutions, the WTO, to only a limited degree. Meanwhile principles that the WTO espouses such as the promotion of trade and liberalisation of international investment flows have penetrated international environmental policy. The neoliberalisation of trade and investment is the WTO's normative vector, not environmental conservation, and relying on the WTO to promote environmental conservation cannot succeed without fundamental changes to global governance. This suggests that achieving robust and effective international environmental policies cannot be achieved by integrating environmental policy integrants into a neoliberal integer. Instead, the emphasis should be on integral change.

Environmental policy and global economic governance: Towards integral change

Integers establish the context within which attempts at EPI must take place. They are simultaneously the targets of EPI and the constraints with which EPI must grapple. In the context of global governance, neoliberal integers set the limits of environmental policies, admitting only those that are congruent with neoliberal principles and filtering out the rest. In such a context, effective environmental policies that arrest the structural causes of environmental degradation at source are unlikely as they would challenge the interests of the powerful economic and political actors that promote the ideology of neoliberalism. On this view, because EPI cannot achieve little more than marginal and incremental environmental gains what is needed is integral change, that is a fundamental shift of the normative vector of global governance away from neoliberalism.

The rights that are most important to neoliberalism include rights to property (including intellectual property), the right to invest and the right to free international trade. The main challenge to neoliberalism is international environmental law, namely that body of law that aims to regulate the relationship between humanity and nature. Although there is no explicit recognition of a human right to a clean environment in international law it can be argued that the growing body of international and European Union environmental law constitutes a *de facto* recognition that humans have environmental rights to a sustainable environment (Fitzmaurice and Marshall, 2007). Much international law promotes instrumental values, seeking to conserve the environment for human use, although some legal instruments mention intrinsic values, in particular the Convention on Biological Diversity (United Nations, 1992).

One proposal for strengthening international environmental law is to create a new organisation of similar stature to the WTO – a World Environmental Organization (WEO) – responsible for handling all international environmental instruments (Bauer and Biermann, 2005; Biermann, 2000, 2002; Oberthür and Gehring, 2004). Amongst the arguments put forward for a WEO are the following. A WEO could coordinate and rationalise the disparate international institutions that handle environmental issues, eliminating areas of duplication and addressing gaps in international environmental governance whereby discrete environmental issues are governed by separate international environmental agreements, thus ignoring the complex interdependences within ecosystems and between ecosystems and society. A WEO could function as a coordinating body streamlining the activities of different

international legal agreements and exploiting the synergies between them. By speaking with a single clear voice on environmental issues, a WEO could promote environmental standards in global governance. If it had sufficient implementation capacity to enforce its decisions, a WEO could help to provide a new normative vector for global governance, one founded on environmental rather than neoliberal norms.

Against this it can be argued that a WEO that dealt solely with environmental issues and which had no broader mandate on global economic issues would represent only a modest institutional balancing act. The result could be a more sharply polarised model of global governance in which two major international institutions – WTO and WEO – vie for supremacy. At present, international legal instruments coming under the auspices of the WTO have greater normative force in international law than environmental instruments, and it is not clear that creating a WEO would resolve this problem. Leaving the WTO with responsibility for international trade and investment law while creating a WEO with responsibility for international environmental law would not solve the problem, merely recast it.

If the coexistence of a WTO and WEO is undesirable, then a theoretical possibility, based on the logic that a fundamental reorientation of global governance is necessary, is to abandon the WTO and create a WEO. The WEO would then assume responsibility for international law on trade and investment as well as on the environment. International trade could be permitted if, and only if, it did not generate adverse environmental impacts. The burden would be placed on those who wish to trade to demonstrate that their products met agreed criteria of sustainability. Agreeing a reformed global governance in which environmental norms prevail over economic norms may be the most desirable option for integral change in global governance; but given how trade and investment liberalisation have dominated the post-war global economy it is, at least at present, unfeasible. Certainly there is no political will amongst states and businesses to abolish the WTO, although as a strategy this is favoured by some environmental and social campaigners (Wallach and Woodall, 2004).

Conclusions

It has been argued that EPI may be imagined as the integration of environmental policy integrants into broader integers. The intent of EPI is that it will mainstream environmental norms throughout policy systems, reorienting the normative vectors of policy integers, with other policies admitted only to the extent that they do not result in environmental degradation. However, the experience of EPI as a strategy is that while it may rid mainstream policy-making systems of their worst excesses it has had limited success in shifting the normative vector of policy integers.

This paper has urged that caution be exercised with respect to the received wisdom that EPI requires strong participation. From an environmental perspective, the quest for a model with a strong degree of integration based on broad participation across different sectors may admit actors with an interest in unsustainable resource exploitation. The participation of an heterogeneous mix of actors with widely differing values and interests policy preferences may render the process of forging collectively agreed integrated responses more difficult. Indeed the main reason why environmental policy is often framed as one of policy integration is because the traditional mode of policy making of ministries and sectoral-based institutions is not flexible enough to respond to the intersectoral attributes of environmental problems. In this respect, the problem of environmental policy is in large part the process of policy making itself. In particular, the role of neoliberal values in shaping environmental policy integrants prior to attempts at integration fundamentally weakens the transformational potential of EPI.

If EPI is to play an active role in environmental conservation then, rather than negotiate and compromise with other sectors and actors whose activities lead to environmental degradation, it must seek to limit their autonomy. It must establish the parameters of action,

prescribing those actions and behaviours that are desirable from an environmental conservation standpoint and proscribing those that are not. This would generate a fundamental re-orientation of policy making with integers defined by environmental norms, and integrants admitted only to the extent that they are congruent with those norms. However, how this can be achieved is no easy task, challenging, as it would, some of the world's most powerful businesses and governments.

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