THE EFFECT OF ENVIRONMENTAL POLICY INTEGRATION (EPI) ON THE EU AND TURKEY'S ADMINISTRATIVE SYSTEM IN NATURE PROTECTION POLICY

ÇEVRE POLİTİKASININ BÜTÜNLEŞMESİNİN AVRUPA BİRLİĞİ ÜZERİNDEKİ ETKİSİ VE TÜRKİYE'NİN İDARİ SİSTEMİNDE DOĞA KORUMA POLİTİKASI

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ÖZET

Çevre Politikasının Bütünleşmesi (ÇPB) Avrupa Birliği'nin (AB) çevre politikası içerisinde önemli bir kavram haline gelmiştir. Bununla birlikte, ÇPB'nin uygulanması hem AB hem de üye ülkelerde özellikle doğa koruma politikası içerisinde yetersiz görünmektedir. AB, üye ülkelerin idari sistemlerini gerekli reformlar konusunda zorlasa da, henüz bir idari sistem modeli ortaya koyamamıştır. Buna koşut olarak; kimi iyi uygulamalardan yararlanan Türkiye de, ÇPB'yi uygulamak üzere idari sisteminde çeşitli değişiklikler yapmak zorundadır. Bu yüzden, ilk olarak Türkiye kendi mevcut idari sistemini gözden geçirmeli, gerekli reformları yapmalı ve ÇPB ile ilgili norm ve uygulamaları kendi idari sistemine içselleştirmelidir.

Anahtar Kelimeler: *Çevre Politikasının Bütünleşmesi, AB ve Türkiye'de Doğa Koruma Politikası, Siyasal Süreç.*

ABSTRACT

Environmental Policy Integration (EPI) has become one of the important concepts in the EU Environmental Policy. However, the implementation of EPI in both the EU and the member states seems to be insufficient especially in the EU Nature Protection Policy. Although the EU urges member states' administrative systems to make necessary reforms, the EU has not been able to put any model administrative system. Accordingly, Turkey has to make changes within its administrative system to implement EPI properly though Turkey can only benefit from some best practices. Therefore, Turkey should initially examine its existing administrative system and make necessary reforms and then internalize norms and practices relating to EPI in its administrative system.

Key Words: *Environmental Policy Integration (EPI) , The European Union and Turkey's Nature Protection Policy, Policy Process.*

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INTRODUCTION

Environmental Policy Integration (EPI) has become an important policy concept for the EU simultaneously with the EU's evolution as a complex multilayered governance system along with its central institutions, mainly the Council, the Parliament, the Commission and the Judicial Court, and for the currently 27 member states with their different administrative structures. When the EU has evolved as a complex multilayered supranational governance system, the implementation problems of the EU Policies gained another dimension because now the ineffective implementation of the EU policies was challenging the legitimacy of its supranational structure. Within that context, environmental policy has also become one of the core policy areas of the EU in line with the evolution of EU as supranational actor since the Single European Act (SEA). After the SEA, the implementation of EU Environmental Policy has got a privileged priority within that multilayered governance system. However, among various implementation problems of the EU Policies, the inefficient application of EPI had a crucial role in the failure of the EU Nature and Biodiversity Protection Policy.

One of the core elements of the EU Environmental Policy, namely the 'sustainable development' concept involves environmental, economic and social dimensions and aims mainly at preventing environmental degradation and resource consumption in economic growth. In addition to those dimensions, from the administrative point of view, implementation of the EU sustainable development policy heavily relies on the integration of environmental concerns into other policies of the EU.

However, it is a generally shared view that the protection of the delicate balance among these dimensions is very difficult although the EPI is crucial for the implementation of the EU Environmental Policy, as the commitment of the EU's political leadership to environmental integration remains volatile, especially during difficult economic times (Wallace, Pollack and Young, 2010: 325). This is why the existing economic crises of the EU have brought about many concerns among the environmentalists for the protection of the delicate balance between economic growth and environmental degradation in member states especially the ones that are experiencing the recent economic crises more intensively.

Even though EPI remains an objective in EU, nowadays it is largely organized and implemented through the delivery of climate change policies. The comprehensive new package of climate and energy policies adopted by the EU in late 2008 requires unprecedented degrees of coordination between the environment, transport, agriculture and energy sectors (Cini and Borrogan, 2010: 369). However, the objective of EPI is not only prominent for EU Climate Change Policy but also for other EU

Environmental Policy realms especially for the implementation of EU Nature Protection Policy. The importance of EPI for EU Nature Policy can easily be seen in all relevant studies examining this policy area. There is also need to bear in mind that comparatively better performance indicators of EU Climate Policy do not clearly verify that EU has managed to reconcile EPI in that policy area. Regarding to performance measurement, the comparison between climate change and biodiversity is difficult because they have different characteristics. As Convery says (2010: 2-3), in climate change, performance is measured mainly by emissions, expressed in tonnes of CO_2 equivalent. Biodiversity loss, in contrast, has many facets with various estimates of species loss, fragmentation and loss of habitat, reported at different times and relating to different countries and regions. Therefore, it can easily be claimed that the implementation of EPI in Nature Protection Policy has a more complex structure and the administrative system has to deal with more complicated problems.

The insufficient implementation of EPI in EU and its member states and thereby the failure of EU Nature Protection Policy is not only European administrative system's failure but also the failure of Turkish administrative system. Within the EU membership process, as Turkey is still continuing to adopt the EU environmental acquis including nature protection and biological diversity into Turkish legal system, the transposition by itself is not enough without proper administrative system that has to implement them. In that respect, there is also a need to develop an administrative system that can facilitate the integration of environmental policy into other sectors. This requirement has emerged not only from the EU harmonisation process but from the need for an administrative reform which was considered necessary prior to this process, i.e. before the start of membership negotiation process in 2005. However, this necessity has gained impetus with the EU membership process. It can be argued that although the EU Nature Protection Policy requires the effective implementation of EPI in member states and in Turkey, there is still no unique administrative system that can be put as a model for the successful implementation in EU. That is why Turkey's administrative system should design its implementation structure of EPI by considering both some best practises in some member states' administrative systems mainly by considering its own administrative features and then internalize the norms and practices relating to EPI within its administrative system.

1. THE FAILURE OF THE EU NATURE AND BIODIVERSITY PROTECTION POLICY

In EU, it is evident that while there is a wide scope of legal legislation on nature protection and biodiversity, the loss in habitats and species is still going on with large numbers. According to the EU (EEA Technical Report, 2010: 9), 25% of marine mammals and 15% of terrestrial mammals, 22% of amphibians, 21% of reptiles, 16 % of dragonflies, 12 % of birds and 7 % of butterflies in particular are under the threat of extinction at Europe. In addition to these loses, according to bio geographical assessments, only 17 % of European habitats and species seem to have 'favourable' condition, while 65% of habitats and 52% of species seem to have 'unfavourable' conservation status. Moreover, areas of extensive agriculture, grasslands and wetlands are continuing to decline across Europe.

The failure in EU Nature and Biodiversity Protection Policy is also underlined by other EU official reports. According to the 'Assessing Biodiversity in Europe' Report (EEA, 2010: 5), Europe could not meet its 2010 targets in its Nature and Biodiversity Policy because of the "gaps in policy implementation and integration, a lack of political will, insufficient financing and communication, the absence of quantifiable targets and inadequate knowledge and monitoring of biodiversity in Europe". Since the EU acknowledges the inefficiency of Environmental Policy Integration (EPI) in other relevant sectors as one of the crucial reasons for the failure of policy, in the same report states that "a more integrated approach for biodiversity management across sectors would be an important step" for the success of the EU Nature and Biodiversity Policy (EEA, 2010: 7).

In addition, Council of the European Union (European Council, 2011: 2) has pronounced that 'EU Biodiversity strategy to 2020' brings the attention to the obstacles that have prevented the achievement of EU 2012 targets on nature and biodiversity protection. These obstacles are listed as "insufficient sectoral integration across EU Policies in particular in the areas of agriculture, fisheries, water, climate and energy and other policies such as forestry".

Previously, the European Commission adopted the Communication on 'Halting Biodiversity Loss by 2010' (COM/2006/0216 final) in 2006 to highlight the importance of biodiversity protection as a vital element of sustainable development and set out a detailed 'EU Biodiversity Action Plan' to achieve this aim. The main reason for introducing the EU Biodiversity Action Plan (BAP) was to combat with the implementation problems of the biodiversity concerns with other sectoral policies in an unified way. To achieve the 2010 target, the integration of biodiversity policy area into other policy areas was also considered to be an essential task to guarantee success (Commission, 2012). Although the EU Biodiversity Action Plan (BAP) was introduced to cope with the integration problems of biodiversity policy, in the assessment of this plan, it is stated that the main

target of BAP, which is the integration of biodiversity into relevant sectors, is "hampered by the fragmentation of departmental responsibilities at EC and national level" (Commission, 2010: 9). In the same manner, Biodiversity Action Plan's Midterm Report[2] stated that "integration of biodiversity considerations into other sectoral policies remains a key challenge" (Commission, 2008: 12). It is concluded that the failure of the integration of Biodiversity Policy in BAP is due to the focusing on the existing instruments rather than the development of new instruments for the integration (Commission, 2010: 16). Consequently, it is recommended that while developing the post-2010 BAP strategy, there is a need to examine institutional structures to develop horizontal integration at the member state and EU level (Commission, 2010: 44).

Therefore, EU accepts that one of the most important reasons for the failure in EU Nature Protection Policy is the inefficiency of EU and the member states to integrate environmental policy sector to another relevant sectors and that problem will continue unless the member states' adopt their institutional structure and develop new instruments for effective integration. It is evident that EU gives the main responsibility to member states in order to make reforms in their administrative structures.

2. THE BACKGROUND OF THE ENVIRONMENTAL POLICY INTEGRATION IN THE EU

When the 'Sustainable Development' (SD) concept has been for the first time introduced in 'Brundtland Report' (Our Common Future, 1987: 8-9) in 1987, it was declared that "sustainable development can only be pursued if population size and growth are in a harmony with the changing potential of the ecosystem". In order to accomplish the goal of sustainable development, it was also stated that "the global environment/development challenges pose problems for institutions that were established on the basis of narrow preoccupations and compartmentalized concerns". This statement was also emphasizing for the first time the necessity for integrating environmental concerns into other sectoral concerns.

In the European Union context, the 'sustainable development' principle has become salient for EU Environmental policy in 1997 and took part in the basic legal text, i.e. the Amsterdam Treaty. In that treaty, the sustainable development principle was put as one of the EU's objectives in Article 2 as "...to promote economic and social progress and a high level of employment

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[2] The European Commission adopted the Communication as 'Halting Biodiversity Loss by 2010 and Beyond' in May, 2006 and set out a detailed Biodiversity Action Plan to achieve this target. In December 2008, The Action Plan's midterm report was published to provide a comprehensive assessment of the Plan.

and to achieve balanced and sustainable development....". Article 6 of Amsterdam Treat stated that "environmental protection requirements must be integrated into the definition and implementation of.... Community policies and activities..... in particular with a view to promoting sustainable development" (Amsterdam Treaty, 1997).

As the emphasis on EPI as an article in Amsterdam Treaty was not sufficient to apply it in policy arena without giving practical application to implement it, the European Council Meeting in Cardiff in June 1998, so called 'Cardiff Process', was an attempt to introduce some means for EPI to integrate the environment into other policy areas. As an instrument for EPI, the 'Environmental Impact Analysis' (EIA) was introduced by the Council so that "major policy proposals by the Commission should be accompanied by its appraisal of their environmental impact". In addition to this, the European Council has also invited the relevant bodies of the Council to establish strategies for environmental integration and monitor integration progress by setting up guidelines and indicators in policy areas in transport, energy and agriculture (Cardiff, 1998: 12-13). Most configurations of the council (e.g. agriculture) were invited to develop an environmental integration strategy, and member governments were supposed to exchange 'best practice' models as well.

In Cardiff, the Commission has also set out guidelines to enable the environmental dimension to be integrated into other policies including "integrating the environment into all activities by Community institutions, a review of existing institutions, introduction of strategies for action in key areas, definition of priority actions and mechanisms for monitoring implementation". Moreoever, the Commission proposed a gradual approach based on two priority objectives: Agenda 2000 and Climate Change (Cardiff,1998).

The Lisbon Process (2000) can be given as another important milestone for the implementation of EPI since the Lisbon Process like the other policy areas has put the 'Open Method of Coordination' (OMC) for the implementation of environmental dimension. The OMC can be defined as a non-legislative approach for the policy process based on informational instruments such as disseminating best practices among member states and social pressure created on member states like naming and shaming. It also includes setting short, medium, and long term policy guidelines, establishing performance indicators and benchmarks translating targets from the European to national and regional levels, and periodic monitoring, per review and evaluation. (Homeyer, 2005: 61).

Since there is a strong need to put EPI for the environment policy in a more practical way, the Cardiff Process has been complemented by the

adoption of the 'EU Sustainable Development Strategy' (SDS) in 2001 (amended in 2005). It was stated that the process of integration of environmental concerns in sectoral policies initiated by the Cardiff Process must continue and provide an environmental perspective to the EU SDS Strategy. In addition, the sectoral environmental integration strategies should be in a harmony with the specific objectives of the SDS Strategy (SDS, 2001: 14).

EU 6th Environmental Action Plan (EAP) covering the period of 2002-2012 can be shown as another attempt to implement EPI effectively in EU Policy Process. 6th EAP tried to renew efforts to integrate environmental concerns into other policy areas and for developing policy in a new way, focusing on crosscutting themes rather than specific pollutants (Diran, 2010: 455). The 6th EAP proposed the integration of environmental objectives into the early phases of the different sectoral processes and an ability to assess and make informed decisions. It can be safely claimed that as Nugent (2010: 347) says the integration of environmental concerns into other policy areas are supposed to be deepened in the Seventh Environmental Action Programme.

In Lisbon Treaty (2009), there is another reemphasis on sustainable development and EPI as a core objective of EU Policy after the Amsterdam Treaty. The New Treaty once again requires that environmental protection requirements must be integrated into the definition and implementation of the Union's policies and activities in particular with a view to promoting sustainable development (Article 11).

3. THE ENVIRONMENTAL POLICY INTEGRATION IN THE EU POLICY PROCESS

Environmental Policy Integration (EPI) has originated from Sustainable Development (SD) concept. SD has granted prior position to environmental objectives while it aimed to balance economic and social concerns. In that process, EPI tries to ensure that "the long term carrying capacity of nature becomes a principal societal objective". Thus, all the decisions should give priority to environment and all the sectoral policies should be assessed in terms of their impact on the ecosystems (Jordan and Lenschow, 2010: 148). Therefore, the EPI is regarded as a key strategy to reach to sustainable development in addition to its acceptance as a process to ensure that environmental issues are fully taken into account in determining and/or implementing sectoral policies.

A major goal of EPI is to change the administrative authorities' traditional method of taking decisions and to integrate environmental considerations

into the decision making process. Hence the EPI process should open the decision making system and make it more transparent and subject to inspection (Weerdt, Assche, Devuyst, 1996: 305). This is why the introduction of Open Method of Coordination (OMC) with the Lisbon Process is significant for EPI.

EPI as a policy principle needs to be implemented in practice. However, when the everyday practices are examined, it is easily seen that policy integration is such a complex issue that there are few best practices that can be easily shared. In this situation "the structure of the prevailing political system (institutions), the political context (politics) and the social, legal and administrative tradition of a polity (cognitive predispositions)" (Jordan and Lenschow, 2010: 150) can help us to understand the relevant dynamics for effective EPI.

From an institutional perspective, EPI requires a multi-sectoral and multi-level coordination but this situation brings about a challenge since traditional administrative systems organize their governance activities into sectoral ministries and decentralised agencies. Moreover, there are only few examples that can be given for the coordination units of the traditional administrative systems including establishment of green cabinets, powerful central ministry or council for sustainable development. In terms of administrative tasks in EU Policy Process, sectoral Directorate Generals (DG) in the Commission and sectoral Ministries at the member states need to give special attention during the policy formulation either in supranational level or national level. However, all these sectoral administrative units have their own objectives and it can easily be assumed that it is so difficult to give environmental objectives an equal status with other sectoral objectives. As a result, there is a need for the monitoring of the DG Environment (at EU level) to ensure that other units incorporate environmental interest into their own objectives as well. At the national level, officials of the environmental ministries should also observe other sectoral ministries so as to ensure their focus on the environment and to enable greater cooperation at different administrative levels (Schout and Jordan, 2008: 964).

As Sgobbi (2010: 13-14) expresses, it is widely accepted that the implementation of EPI requires changes in institutions and decision-making processes. There are two main approaches can be employed to analyse these changes; top-down and bottom-up approaches. Top down approach can be summarized as an established strategic framework as a result of environmental concerns that lead to establishment of policy documents and then to provide the necessary incentives for all administrative organisations to follow them. In contrast, bottom-up approach focuses on guiding administrative units in their efforts to integrate environmental issues both in

planning and implementation in their daily transactions. Bottom up approaches are usually implemented through informal communication, training, exchanges of good practices, committees, task forces, guide lines and rules.

Top down and bottom up approaches in EPI are commonly known as vertical and horizontal environmental policy integration that has been introduced by Lafferty and Hovden. For them (Lafferty and Hovden, 2003: 12-13), vertical environmental policy integration (VEPI) refers to the "extent to which a particular governmental sector has adopted and sought to implement environmental objectives as central in the portfolio of objectives that the governmental body continuously pursues". VEPI has some specific features including formulation of a sectoral environmental action plan, application of both environmental impact assessment and strategic environmental assessment for all sectoral decisions, timetables and indicator based targets implemented in action plans.

Lafferty & Hovden defines horizontal environmental policy integration (HEPI) as "the extent to which a central authority has developed a comprehensive cross-sectoral strategy for EPI". This central authority can be either the government (cabinet etc) itself or a particular body (commission etc). HEPI could include the existence of a long term sustainable development strategy, the existence of a central authority specifically entrusted with the supervision, coordination and implementation of the integration process, clear designations of the sectoral responsibility for overarching goals, timetables and targets for environmental policy, periodic reporting of progress with respect to targets at both the central and sectoral levels, an active and monitored usage of EIA and SEA for all governmental policies (Lafferty and Hovden, 2003: 14-15).

Vertical integration concerns the extent to which sectoral policies address environmental concerns in their strategies and implementation of the activities. On the other hand horizontal integration refers to the extent to which there exists cross sectoral strategies and mechanisms to coordinate and foster cooperation among institutions. Hence, for instance, energy policy clearly needs to integrate environmental concerns (vertical integration), but it will also affect to a significant extent agricultural practices of biofuels (horizontal integration) so the coordination between the energy and agriculture sector is needed as well (Sgobbi, 2010:33).

Although the ultimate objective of institutional analysis should address the inefficiencies in the current administrative systems, to identify best practices and to foster policy coordination, it is difficult to propose an idea about which system is more effective for the implementation of EPI. There are mainly two opposing views about which form of institutional policy making

is more convenient for the implementation of EPI. According to the first view, "strong and centralised bureaucracies are needed for the successful implementation of sustainable development strategies" because "complex problems require a high level of coordination and cooperation among different institutional actors" so a strong central state is considered to be more favourable (Sgobbi, 2010: 18-19). In contrast according to the second view, there is a need to have a "generalised tendency to associate a more effective promotion of EPI to new governance models, based on integration, participation and devolution of powers" so the supporters of the second view are in favour of a more decentralised institutional systems. However, there are not many studies on comparing progress about EPI among the countries in terms of the institutional effectiveness of EPI in improving the environment. In addition, given the variation among the countries in terms of size, political structure, and geographical condition and so on, there is no model structure which suits all the countries (Sgobbi, 2010: 26-29).

The overall aim of the implementation of EPI is to ensure that all departments and institutions contribute to environmental protection and to achieve sustainable development. Ministerial structures alone are not a sufficient determinant for integration, but assessment must be supported with an analysis of inter-ministerial relations. (Sgobbi, 2010: 32). In that respect, comparing horizontal fragmentation, all political systems have more or less ministerial fragmentation. In that case, Germany can be given as a good example of a high level of ministerial independence. Coordination from a vertical perspective, more federal systems, including Germany, USA and Australia as well as the EU, have encountered significant institutional obstacles to implement EPI. (Jordan and Lenschow, 2010: 151-152). So it is so difficult to claim which institutional structure is more suitable for effective implementation of EPI.

About the present institutional structure for EPI in Sweden, Sörderberg's (2011: 539) study asserts that multi-sector EPI benefits from institutional arrangements which allow for a) open actor access to policy making b) use of environment-related knowledge c) monitoring mechanisms such as concrete policy goals and/or policy measures d) both environment-sectoral and intersectoral coordination.

There are also not many analyses on the effectiveness of EPI instruments. There is some knowledge on the performance of policy appraisals and Strategic Environmental Analysis (SEA). It is believed that procedural EPI instruments (for example SEA, policy appraisal) have generated some benefits for EPI in creating new administrative opportunities to green sectors, facilitating longer term processes of policy learning and improving

the legitimacy of policy interventions by increasing transparency and public participation (Jordan and Lenschow, 2010: 155).

Each EPI instrument has different entry points into the policy process. Thus, while some instruments seek to change the configuration of actors, others aim to influence the agenda setting process, mobilize new knowledge, improve the coordination between sectors and issues, influence the distribution of resources during decision making and implementation, or create new opportunities for evaluation and monitoring (Jacob, Volkery and Lenschow, 2008: 39). In that situation, there is a tendency to use instruments based on information gathering and issue raising; few countries, on the other hand, make use of approaches that aim to redistribute resources or that significantly empower environmental departments in the decision making process. Furthermore most countries prefer instruments that add to the existing institutions rather than intervening and changing existing institutions. The UK, Canada, Norway and the Netherlands are the most active when it comes to introducing to more operational EPI instruments. Nearly all countries have introduced general strategic approaches such as sustainability strategies or environmental plans, and the majority of countries have introduced constitutional provisions, interdepartmental working groups and independent bodies for advising and evaluation (Jacob, Volkery and Lenschow, 2008: 39).

In fact, the effectiveness of EPI can only be assessed in terms of the outcomes of the processes that assist integration although it is difficult to quantify these processes. Thus, the successful EPI requires that environmental protection is a key objective of policy appraisal, design and implementation together with consideration of the socio-economic needs of development (Sgobbi, 2010: 36).

4. THE EU ACCESSION PROCESS AND TURKEY'S NATURE PROTECTION PROCESS

EU Environmental Policy in general and EU Nature Protection Policy in special require Turkey to adopt EPI into its administrative system without giving much reference to how to do it. Turkey needs to implement EPI effectively but there is no model for how to implement EPI in what kind of institutional structure. It is certain that Turkey needs to change some elements in its administrative structure but there is no clear EU guidance for how to do that.

This was also the case during the Eastern enlargement of EU. Although the membership to EU can be seen very beneficial for some member states to strengthen their implementation of EPI, for the accession countries,

there was no common tool that EU served for the EPI Process success. Probably, CEE accession countries could also use some of the experience and organisational structures created to facilitate EU accession to promote sustainable development for EPI. The accession process for the CEE accession countries has led to the formation of entirely new intra and inter sectoral structures (Homeyer, 2005: 70). In addition to institutionalisation problems relating to EPI, another important problem would be given as "internalisation of the norms and practices of sustainable development into the administrative practices and decision making routines of non-environmental sectors and actors" (Homeyer, 2005: 71).

According to Sgobbi (2010: 30-31), the common problems which are often encountered by governmental institutions can be listed as lack of information exchange, insufficient capacity to handle environmental information, high transaction and coordination costs. Effective EPI requires commitment, strategic vision and a clear division of responsibilities among institutions. Effective and transparent communication channels are also needed to enable cooperation among institutions and flow of information and knowledge. Several institutional conditions may help in fostering EPI and their feasibility and effectiveness will depend on country-specific conditions such as the prevailing culture, the interest of the general public and so on.

In that respect, it can be argued that Turkey should formulate two main prerequisites necessary for implementing the EPI in Turkey. Initially, Turkey needs to establish new coordination mechanisms or modify the existing administrative mechanisms to enable environment to integrate with other relevant sectors and then to stimulate for internalization of norms and practices relating to EPI within the administrative system.

The results of the field study (Çörtoğlu, 2009) conducted by the author in the Ministry of Environment and Forestry shows that there are some problems in the policy process of Turkey's Nature Protection Policy in terms of policy context, policy style and policy structure (Table 1). In terms of policy context (Table 2), from the point of overall objectives of Turkish Nature Protection Policy, there are some problems for establishing a general protection strategy and determining national priorities for biological diversity in Turkey. This problem would be solved with the new 'Nature Protection Law' which is currently debated in the Turkish National Assembly. However, the main problem relating to nature protection in policy context is that in protected areas, there are no common protection objectives of the environmental sector with the relevant sector. The lack of developing common protection policies with other policy sectors constitutes another problem for the Turkish Nature Protection Policy. As a result, there is a lack of integrated approach with other policy sectors and this situation

generates a clash in responsibilities with other state institutions in policy process.

It can be argued that the new 'Nature Protection Law' would not be the only answer for establishing an integrated approach with the relevant sectors so there would be a need for overall comprehensive regulation in Turkey which governs the relations with different sectors and enables an integrated approach in terms of policy context. Comprehensive regulation would lead to changes in administrative structures on decision making processes that can facilitate EPI.

Another problem for policy context which has been found in the field research is that there is a lack of harmony between the Turkish Nature Protection legislation and other regulations of relevant sectors. According to the field study, the regulations relating to the incentives for tourism and exploitation of forests do not comply with the nature protection legislation. This problem also hampers the environmental policy integration and again call for harmonization need in policy context. As Weber and Driessen (2010: 1124) puts in contextual level, the solution for this problem can only be solved by unified paradigms, norms and values.

Another result obtained in field study, in terms of policy context is the lack of clear definitions of concepts that are important for the application of general objectives appear as another problem for Turkish Nature Protection Policy. 'Sustainability' and 'in situ protection of biological diversity' are some examples for these inadequate interpretations of concepts which are vital for the definition of general objectives. In that respect, the vague conceptualisation of 'sustainable development' in policy context has also made EPI more difficult to implement for the administrative structure. Therefore, like some other important concepts, the sustainable development and EPI concepts require a practical meaning in policy context for effective implementation in nature protection.

Application to Existing Legislation is the most problematical area in policy context for Turkish Nature Protection Policy. Existing legislation on nature protection lacks some of the important legal conditions. Among these, implementation of Environmental Impact Assessment (EIA) process can be shown as a proof of that problem. EIA is one of the most vital instruments for the EPI in nature protection but its inadequate implementation in Turkey such as lack of participation of local people to the EAI process, is allowing only limited examination of current biological diversity conditions in projects would be given as a proof for the need for developing better legal base of EIA process for EPI implementation. Another important instrument for EPI, namely, the Strategic Environmental Assessment (SEA) is still under transposition phase for Turkish Environmental Policy.

The legislation preparation mechanism is also a problematical area in policy context. Technical and scientific incapability are causing some difficulties for the preparation of nature protection regulations. For instance, for neither protected areas nor species there does not exist enough scientific information. So many regulations lack scientific base. This problem also negatively affects the regulations relating to EPI. The EPI process would not have any scientific support during the policy formulation. Therefore, this situation would put it in a vulnerable position against some other sectors that have more concrete evidences.

The problems in policy context negatively affect the establishment of laws, regulations and strategies which are very critical for top-down approach to implement EPI in nature protection policy.

Another aspect of nature protection policy is the policy style within the policy process (Table 3). Policy style covers the relations of state institutions with other actors like environmental groups. The state institutions' tendency to impose decisions or reach consensus with these actors form the policy style. In other words, policy style involves standard operating procedures for making and implementing policies. The policy style also covers the procedures and rules on stakeholder involvement.

In Turkey's Nature Protection Policy, there seem to be a problem between central government institutions and local governments. Central government does not rely on local governments for implementation of nature protection policy. Actually, central government accuses local governments for not taking necessary actions because of their patronage relations or ignorance of common good in small areas. This situation leads to impose decisions on local governments rather than taking decisions with a consensus.

In policy style, civil society relations with the central administration are the most problematical area in a way that civil society organisations can not sufficiently take part in nature protection policy implementation because of some difficulties. For instance, the lack of participation mechanisms for the local groups in the protection activities in special protected areas or the insufficiency of cooperation between voluntary groups and state institutions for the nature protection activities can be given as examples for this problem. These problems are mainly related to participation principle and the inadequate participation of local and civil society groups affects the implementation of nature protection negatively.

As regards to EPI, the relations of central government with local governments and civil society are also crucial for the implementation of EPI. Initially, for the bottom-up initiatives that have been mentioned above, it is crucial for the society to acquire some initiatives for the EPI. Not only should central government impose EPI for the nature protection but also

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local governments and civil society organisations have to contribute initiatives from below. There should be a mutual relationship between central government and other actors for effective implementation of EPI.

Another element for policy style is the public support to EPI implementation. Local governments and civil society organisations should show their positive interest for the integration otherwise the central government could not be capable of implementing policy in lower level. This is also a motivation issue in which highly costly initiatives of central government should be backed up by the society to address integration.

The need for public support should be completed by the central government by improving the transparency and accountability. Civil society organisations should reach necessary information of central and local governments relating to EPI and evaluate the policy process.

In terms of policy structure (Table 4) which is the third component of policy process, it can be seen from the field research that there is not only almost no relationship among state institutions but there is also lack of coordination among them in nature protection. Especially, in some 'Special Protected Areas', sometimes there are two or three state institutions responsible for the administration of these areas. However, the effective protection cannot be ensured among the relevant institutions because they all have different approaches of protection and there is coordination problem among institutions for the proclamation of special protection areas. Different institutions proclaim these protected areas without any coordination among themselves. As Weber & Driessen (2010:1124) addresses, the communication structures are important within and between (sectoral) institutions for the effective EPI implementation.

CONCLUSION

In European Union, even though there is a comprehensive legislation on Nature Protection Policy, it is evident that EU is still far from implementing this legislation effectively. One of the reasons for the failure of Nature Protection Policy is the insufficient implementation of Environmental Policy Integration (EPI) in both EU supranational structure and member states. Therefore, EU continuously urges member states to make reforms in their administrative systems and to develop new instruments in order to facilitate the effective implementation of EPI. However, it is difficult to propose an administrative system which is more favourable for EPI implementation. That is why EU could not provide any model neither for member states nor for candidate countries.

When Turkey's existing problems regarding Nature Protection Policy are examined, it can easily be seen that prior to EU membership, there are some important problems relating to EPI implementation. Therefore, not only the EU membership process but actually existing nature protection implementation problems urge Turkey to make reforms in its administrative system. However, Turkey has to make these reforms in its administrative system mainly by considering its own administrative features and then to internalize the norms and practices relating to EPI within its administrative system.

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Annexes: Tables Mentioned in the Text

Table 1

The distribution of NCBD Policy problems according to the policy areas:

Policy Process	Number	Percentage
Policy Context:	110	40 %
Policy Style:	62	22 %
Policy Structure:	108	38 %
Total:	**280**	**100 %**

Table 2

In this field research, the problems related to policy context presented as:

Policy Context	Number	Percentage
I. Application to General Objectives (AGO):	14	13 %
II. Application to Comprehensive Legislation (ACL):	24	22 %
III. Application to Existing Legislation (AEL):	39	35 %
IV. Harmony of Legislation with Other Regulations (HLOR):	15	14 %
V. Legislation Preparation Mechanism (LPM):	10	9 %
VI. Application to Legislation Enforcement (ALE):	8	7
Total:	**110**	**100 %**

Table 3

In this field research, the problems related to policy style presented as:

Policy Style	Number	Percentage
I. Local Government Relations (LGR):	4	7 %
II. Civil and Local Society Relations (CLSR):	21	34 %
III. Application to Legislation Interpretation (ALI):	3	6 %
IV. Application to Legislation Means (ALM):	6	10 %
V. Application to Scientific Research (ASR):	9	11 %
VI. Application to Strategy, Action and Plans (ASAP):	7	12 %
VII. General Implementation Mechanism (GIM):	12	20 %
Total:	**62**	**100 %**

Table 4

In this field research, the problems related to policy structure presented as:

Policy Structure	Number	Percentage
I. Relations among Institutions (RAI):	27	25 %
II. Application to Institutional Infrastructure (AII):	20	18 %
III. Coordination among Institutions (CAI):	36	33 %
IV. Institutional Behaviour Mechanism (IBM):	13	12 %
V. Application to Institutional Performance (AIP):	6	6 %
VI. Overall Institutional Mechanism (OIM):	6	6 %
Total:	**108**	**100 %**