

Converging impact assessment discourses for sustainable development: the case of Flanders, Belgium

Jean Hugé · Tom Waas

Received: 27 August 2010 / Accepted: 15 December 2010
© Springer Science+Business Media B.V. 2010

Abstract The scientific field of impact assessment encompasses various ‘traditions’, each reflecting a set of particular policy objectives. This paper analyses two types of impact assessment. Regulatory impact analysis focuses on better regulation and competitiveness, while sustainability assessment fosters a holistic approach centred on the values of sustainable development. Through an analysis of the political discourses at the level of the European Union and at the sub-national level of the Flemish Region of Belgium, elements of convergence between the better regulation and sustainable development discourse are identified. The paper analyses how integrated impact assessment can be an integrative tool that allows to merge both discourses and to implement them in day-to-day decision-making. The potential of the existing Flemish regulatory impact analysis framework to be the starting point of an integrated assessment scheme for sustainable development is advocated and motivated.

Keywords Sustainable development · Sustainability assessment · Regulatory impact analysis · Impact assessment · Belgium

1 What’s in a name? Introducing impact assessment

According to the authoritative International Association for Impact Assessment, impact assessment (IA) is the process of identifying the future consequences of a current or proposed action. The ‘impact’ is the difference between what would happen with the action and what would happen without it (IAIA 2009). Choosing which impacts are to be identified will define what kind of impact assessment one performs. If one aims to identify the impacts on the environment, an environmental impact assessment (EIA) will be done; if

Readers should send their comments on this paper to BhaskarNath@aol.com within 3 months of publication of this issue.

J. Hugé (✉) · T. Waas
Flemish Policy Research Centre for Sustainable Development & APNA, Vrije Universiteit Brussel,
Pleinlaan 2, 1050 Brussels, Belgium
e-mail: Jean.Huge@vub.ac.be

the focus lies on health impacts, a health impact assessment (HIA) will be performed, and so on. While this might suggest a simple categorization reflecting classic disciplines, as well as a clear ‘division of tasks’ between practitioners performing the various thematic impact assessments using their own expertise and methodology, reality is much more complex. First of all, the rising awareness of interdependencies and complexity reduces the attractiveness and the use of strictly defined impact assessments. Secondly, thematic impact assessments have the ‘natural’ tendency to widen their initial scope over time. Environmental impact assessment (EIA) is probably the most famous example. The initial focus on the biophysical components gradually evolved to include the physical–chemical, biological, cultural and socio-economic components of the total environment. Thirdly, impact assessment has become a field of science on its own. Thematic categorizations are not sufficient to grasp the process aspects that span over various scientific disciplines (think of mathematic modelling, participatory techniques, political sciences etc.). Impact assessment has turned into an approach in itself, aimed at contributing to structure decision-making. Fourthly, the actual impact of impact assessments on decision-making depends on the institutional context and on the way knowledge feeds into the decision-making process, which is most often a non-linear, ‘messy’ process (Hertin et al. 2009). Impact assessment thus needs to be analysed through a governance lens.

If we are to list the defining characteristics covered by the umbrella term ‘impact assessment’, it is necessary to turn to the common goals put forward by the promoters of—almost—any impact assessment exercise (see for instance Bäcklund 2009; Gibson 2005; Hugé and Hens 2007; IAIA 2009; Van Humbeeck 2007).

- Impact assessment aims to provide information for decision-making by analysing the (unintended) consequences of proposed actions;
- Impact assessment aims to promote transparency and participation of the public in decision-making;
- Impact assessment aims to identify alternative options and/or to design mitigating measures so as to avoid/minimize unintended harmful impacts as well as to foster positive impacts.

The practice of IA relies upon a range of instruments and tools, typically based on the physical and natural sciences and social sciences, in order to predict future expected consequences of possible decisions (IAIA 2009). Although practice and discourse often allow us to cluster the various types of impact assessment exercises under one common umbrella, reflecting common objectives and similar methods, a number of impact assessment fields are/were relatively clearly delimited. This paper will focus on two types of impact assessment: regulatory impact assessment (RIA) and sustainability assessment (SA). These two approaches originally reflect two different ‘traditions’ in the world of impact assessment, but they also share a striking number of similarities, creating opportunities for synergy, as we will see below. Regulatory impact assessment and sustainability assessment used to be clearly and exclusively defined: RIA reflected a competitiveness-based, economic growth-focused agenda, whereas SA reflected a balanced view based on the various dimensions of sustainable development (SD), often with a—historically grown—bias towards environmental issues. The fact that much sustainability assessment thinking has been substantially developed by EIA and SEA (strategic environmental assessment) practitioners is understandable, given that SA is often considered to be ‘the next generation’ of environmental assessment (Pope et al. 2005).

Notwithstanding a few exceptions, the RIA and SA ‘traditions’ did not mix at the level of scholars and practitioners, but this is now changing, partly due to a shift in the dominant

discourse(s) on impact assessment. We will analyze the discursive shifts that are giving rise to an emerging synthesis—sometimes labelled as integrated impact assessment—which is blurring the boundaries between these two impact assessment worlds.

2 Aims and method

The aim of this paper is to analyse how discursive evolutions lead to the convergence of regulatory impact assessment and sustainability assessment towards an integrated impact assessment approach that contributes to the achievement a range of policy objectives fostering SD. This study is part of a research project of the Flemish Policy Research Centre for Sustainable Development (*Steunpunt Duurzame Ontwikkeling*), investigating the potential of impact assessment as an element contributing to the implementation of Flemish sustainability policy.

Two methods were used to perform the analysis:

1. The first method entailed a participatory exercise consisting of a survey and a series of in-depth interviews amongst SD stakeholders (officials, experts, politicians and civil society representatives) in Flanders.

The survey consisted mainly of closed-end questions. However, the respondents were also given the opportunity to issue remarks and suggestions freely. The questionnaire was sent out in early January 2009. Reminders were sent after one month, and the extended deadline was set at March 1st, 2009. The survey was sent out to stakeholders from four target groups: Flemish officials (civil servants), political representatives, civil society organisations and experts. As this consultation aimed at gathering relevant information about the design of impact assessment for SD in Flanders, the stakeholders were carefully chosen among the target groups. Most contacted civil servants were members of the Flemish inter-department Working Group for Sustainable Development, guaranteeing a degree of commitment towards sustainability. All regional ministerial cabinets were contacted, as were the study services of every regionally active democratic political party. The selection of representative civil society organisations was not straightforward: we contacted trade unions, employer organisations, the Flemish Socio-Economic Council (SERV), the Environmental Advisory Board (MINA Board) and the most important non-governmental environmental organisations. Among the contacted experts were officials such as team members of the Unit for Legislation Quality (working on Regulatory Impact Assessment), the Environmental Impact Assessment Unit, as well as a range of accredited thematic experts in environmental assessment. In order to complete the results of the survey and in order to delve deeper into the opinions of stakeholders with regard to sustainability assessment, semi-structured interviews were performed with a selection of stakeholders.

2. The second method used was a literature review consisting of two parts: a desk study of scientific and policy documents concerning SD and impact assessment in Flanders; and a desk study of European Union impact assessment literature.

The paper's first section sketches the context in which respectively regulatory impact assessment and sustainability assessment evolved (both at the international level and in Belgium's Flemish Region) and provides a working definition of both approaches. The second section analyses the converging official discourses of better regulation and SD. The third section sheds light on how discursive shifts contribute to the rising prominence

of integrated impact assessment approaches on the field and focuses in particular on what Flanders can learn from the European experience. Finally, the conclusion offers food for thought on strengthening the institutional anchoring of SD through impact assessment.

3 Setting the stage

3.1 Regulatory impact assessment

Regulatory Impact Assessment (RIA) is basically a stepwise process that aims to improve the quality of regulation. Better regulation is defined as a broad strategy to improve the regulatory environment, containing a range of initiatives to consolidate, codify and simplify existing legislation and to improve the quality of new legislation by evaluating its likely impact (Renda 2009). Better regulation is about correcting the failures of traditional regulation, which is intrinsically linked to the new context of governance. Better regulation aims to open up the policy process and to break down the intimacy of regulators–regulated interactions in close policy communities. It puts emphasis on open and transparent processes, disciplined consultation, fair treatment of the empirical evidence, and robust and pluralistic peer review. Less and better regulation is expected to lead to an increase in competitiveness for industries that in turn would entail the growth of the economy as a whole (Van Humbeeck 2007). Radaelli (2007) observes that the focus of better regulation has swung between regulatory quantity (or de-regulation) and regulatory quality across time and space.

The origins of RIA lie in the United States, where it was introduced in the wake of the first ‘better regulation wave’ brought about by the New Public Management ideas. At the international level, one of the first documents mentioning RIA is the 1995 OECD *Recommendation for Improving the Quality of Government Regulation*. It reflects the consensus amongst OECD countries that a duly performed RIA improves the cost effectiveness and the transparency of decision-making, strengthens participatory processes and avoids ‘useless’ regulation. In the European Union, the *Mandelkern Report on Better Regulation* (2001) has become the reference document with regard to RIA (DBR 2004). The report states that both the member states and the European Commission ‘*should systematically, as part of the impact assessment system and prior to the adoption of any significant regulation, carry out a comparative analysis of the relevant alternatives to regulation (...) the foreseeable impact of each of the relevant options should be submitted to assessment through some explicit and consistently used method*’. This report was followed by the European Commission’s ‘Action Plan on Better Regulation’ (Renda 2009). A lot of individual countries also have RIA schemes in place. Instead of getting into detailed descriptions of the various RIA methodologies, we will focus on the general characteristics of the RIA approach. Jacobs (2006) states that:

- RIA focuses on asking and answering the right questions in a structured framework which leads to transparent policy-making;
- RIA focuses on the systematic analysis of potential impacts of public policy;
- RIA focuses on the communication of information to policy-makers and stakeholders.

Van Humbeeck (2007) makes a similar statement by identifying three factors explaining RIA’s intrinsic added value:

- RIA forces policy-makers to look beyond the boundaries of their own policy domain when considering the impacts of planned policy; RIA thus increases policy coherence;

- RIA allows to analyse policy impacts in a systematic and consistent way as to choose the most suited policy option;
- RIA is a communication tool between government, business and citizens and enhances the transparency of the decision-making process.

The EU Directors of Better Regulation (DBR 2004) propose operational principles characterizing a 'good' RIA:

- Clear problem definition and identification of policy objectives;
- Initiation of the RIA-process at a moment where different policy options can still be chosen;
- Information generation and explicitation of assessment criteria and methods;
- *Ex ante* impact assessment of each relevant policy option;
- Transparent dissemination and generation of the RIA's results.

In conclusion, RIA can thus be defined as a decision-support process that mainly aims to assess the impacts of decisions on competitiveness and administrative burden, focusing on businesses and government as target groups. In the next section, we turn towards another type of impact assessment: sustainability assessment.

3.2 Sustainability assessment

Pope (2006) defines sustainability assessment as '*embracing a range of processes that all have as their broad aim the integration of sustainability concepts into decision-making, processes that may carry the labels sustainability appraisal, sustainability impact assessment, or integrated assessment, amongst others*'. Devuyt et al. (2001) provides some more detail by defining it as '*a formal process of identifying, predicting, and evaluating the potential impacts of a wide range of relevant initiatives and their alternatives on the SD of society*'.

These definitions immediately trigger a new question: what is meant by sustainability/SD?

While the seminal 'Brundtland' definition of SD: '*development that meets the needs of the present without compromising the abilities of future generations to fulfill their own needs*' (WCED 1987) is widely held as the most universal and valid interpretations of sustainability, SD is often further operationalized in the conventional 'pillars' definition. SD is then seen as development that takes environmental, social, economic and institutional aspects into account (Sedlacko and Gjoksi 2009). However, Morrisson-Saunders and Fischer (2006) warn that this view might lead to a legitimization of trade-offs between pillars, in particular trade-offs of environmental issues for economic gain and the perceived social benefits of this gain. Authors such as Gibson (2005, 2006) therefore emphasise the integrative nature of sustainability and focus on principles and process design so as to keep interdependencies and complexity in mind. The variety of interpretations of the sustainability concept does not prevent sustainability assessment to have developed into a field of its own. Integration is a central idea in that field, and this might refer to the integration of all sustainability aspects as well as to the integration of the assessment within the development process of the proposal. Robinson (2004) states that SD is above all centred on integration: it should reconcile development and environmental objectives, views and interests of different stakeholders and various temporal and spatial scales. We refer to Scrase and Sheate (2002) for an in-depth analysis of the integration concept. While scholars have developed a range of methodologies (Lee 2006) and typologies (Pope et al.

2005) to structure the sustainability assessment field, a number of jurisdictions are already applying sustainability assessment on a more or less regular basis. The United Kingdom’s sustainability appraisals, the European Commission’s sustainability assessments of trade negotiations (Kirkpatrick and Lee 2002), the Swiss (Wachter 2005), German (German Federal Government 2008; BMI 2009) and federal Belgian (PODDO 2009) sustainability assessment schemes are examples of such practical applications. Gibson (2005) grasps the main characteristics of a sustainability assessment exercise, of which we present a selection; any SA:

- shows explicit commitment to sustainability objectives;
- covers all potentially significant initiatives (planned decisions);
- is transparent and ensures effective involvement of citizens and stakeholders;
- is initiated at the outset of initiatives when problems/opportunities are identified;
- addresses positive as well as negative, indirect as well as direct, and cumulative as well as immediate effects;
- seeks to identify alternatives that offer the greatest overall benefits and that avoid undesirable trade-offs;
- favours options that reflect a precautionary approach to significant risks.

In conclusion, we propose to define sustainability assessment as a process that aims to integrate sustainability issues into decision-making by identifying sustainability impacts, but also by fostering sustainability objectives to be achieved. It reflects a desire to achieve defined sustainability objectives, by assessing the extent to which the implementation of a proposal contributes to these objectives when compared with baseline conditions (Pope et al. 2005). This objectives-led approach distinguishes sustainability assessment from most other types of impact assessments, as these use the conditions that are likely to prevail in the absence of the proposed initiative as benchmarks for determining the significance of impacts (Hacking and Guthrie 2006). Given the value-laden and at least partly subjective definition of sustainability and its associated objectives, sustainability assessment must be supported by participatory exercises, which in turn is to contribute to more transparent decision-making.

3.3 RIA and SA: two sides of the same coin?

At this stage of the paper, we can already identify a number of similarities between the definitions and the stated objectives of RIA and SA. Figure 1 identifies the objectives shared by both assessment approaches, as well as two SA-specific objectives.

	RIA	SA
To identify and assess future impacts of planned or current actions		
To increase integration		
To enhance communication and transparency		
To provide decision-makers with information		
To structure the policy preparation process		
To foster SD		
To promote broad participation		

Fig. 1 Objectives shared by RIA and SA

Although most of these objectives clearly fit for both approaches, this is also tantamount to the fact that both RIA and SA are types of impact assessment. Indeed, one can reasonably believe that the shared objectives listed in Fig. 1 are in fact common to most impact assessment exercises. In the next section, we will see that these shared general objectives are only one aspect that may (and does) lead to a convergence between both approaches.

However, as the more elaborate list of sustainability assessment principles compiled by Hardi and Zdan (1997) in the ‘Bellagio principles for assessment’ proves, there are also marked differences between RIA and SA. These differences do not affect the common general objectives listed above (Fig. 1). Next to the objectives that are specific for sustainability assessments, the differences are related to general process aspects. Said bluntly, SA *as a rule* offers a more open, holistic and flexible approach even if it requires a clear interpretation of its assessment focus before the assessment can start.

Yet besides a number of common objectives, RIA and SA above all share a common approach to decision-support. Both are processes entailing a set of logical steps to be followed when decisions (such as policy proposals) are prepared, aiming at structuring information on the advantages and disadvantages of possible (policy) options when assessing their potential impacts.

The introductory exploration of RIA and SA literature and practice allowed us to identify similarities and differences between both approaches. However, we warn for an absolute interpretation of both RIA and SA. One should be aware that the boundaries between RIA and SA are not always that clear. Some RIAs might actually encompass much more than ‘narrowly’ defined regulatory impacts, while some SA-labelled exercises might in reality be biased to cover mostly or only economic or competitiveness impacts. Before exploring the potential and actual function of both SA and RIA in the decision-making process (Sect. 6.1), and in particular their contribution to sustainable development, the discourses underpinning the convergence of these two impact assessment processes are discussed in Sect. 4.

4 Converging discourses: better regulation and SD

After having introduced RIA and SA, we will now move ‘up’, towards the policy declarations related to impact assessment and the evolving ‘discourse(s)’ these embody. We will see that these discursive evolutions greatly influence the design and application of impact assessment. By a discourse we mean ‘a way of seeing and talking about something’ (Barry and Proops 1999). Indeed, as Wilkins (2003) states: ‘*people define themselves and their beliefs through both language and actions*’ and the way people give meaning to certain aspects of life in society creates -a series of- discourses, which ideally reflect coherent—yet essentially normative—worldviews. Basically, by using discourse analysis we do not take the definition of problems for granted. The aim is to elucidate the various problem perceptions involved in an issue. We focus on the broader definition of discourse analysis (not on the linguistic-oriented interpretation) where the focus lies both on the ways of thinking and arguing on specific themes or issues, and on the related practices, structures and institutions (Runhaar et al. 2005). This approach contributes to structure complex scientific and political debates.

Impact assessment (IA)—in its generic interpretation (see Sect. 1)—has received increasing attention throughout the last years due to its diffusion among OECD-countries. This development is driven on the one hand by the ‘better regulation’ discourse, and on the

other hand, IA is also promoted to address the requirements of SD. Both discourses are reflected in policy agendas that demand a better quality and coherence of policies and/or foster sustainable development, and IA is considered as a key tool to accomplish this task. This has often led to an integration of several sector assessment procedures into one overall assessment procedure (Hertin et al. 2008). This section analyses the discourse at European Union level and at the level of the Flemish Region of Belgium; in Sect. 5, the consequences on the function of impact assessment processes in decision-making is discussed.

4.1 Converging discourses and impact assessment at the European commission

In 2001, the European Commission (EC) introduced its first version of the Impact Assessment Guidelines (in order to avoid confusion, the EC's Impact Assessment will be written in capital letters, while impact assessment continues to refer to the generic definition outlined in this paper's introduction).

The gradual introduction of Impact Assessment at the European Union (EU) level since 2001 is a direct consequence of the 2001 European SD Strategy and the Lisbon Competitiveness Agenda (Tanasescu 2009). But how are these two guiding European policy frameworks linked? Analysing the discourse embodied by these two major strategies will clarify the relationship with Impact Assessment. The two strategies were supposed to be complimentary, with a big question mark regarding the creation of synergies between them and the identity of the guiding strategy: how would the integration between the two be achieved in practice? Notwithstanding ambitious goals formulated at the Helsinki European Council in December 1999 reflecting the need for '*...a strategy dovetailing policies for economically, socially and ecologically SD*' (Tanasescu 2006), these objectives were split into two strategies. The Lisbon Strategy was drafted first and aims at making the EU the 'fastest growing knowledge-based economy in the world'. The 2005 EC intermediate report is almost entirely dedicated to the economic side of the Lisbon agenda, and almost drops SD completely (Tanasescu 2009). However, Renda (2009) states that the re-launch of the Lisbon agenda under the name "Partnership for growth and jobs" identified better regulation as one of the main pillars of competitiveness and SD in Europe. However, the re-launched Lisbon Strategy of 2005 still shows a predominance of growth and employment issues, as does the 2010 evaluation of the European Commission (EC 2010): '*In assessing ten years of the Lisbon Strategy, what ultimately counts is the impacts on growth and jobs*'. It is fair to say that techno-optimism remains the predominant approach to growth in the Lisbon Strategy, although a prudent shift to more environmentally friendly and energy-efficient innovation can be observed (Sedlacko and Gjoksi 2009). These indications of a prudent shift are also reflected in the 2010 evaluation by the Commission, which states that the Lisbon Strategy has led to a more sustainable future, as economic growth has been accompanied by a downward trend in energy intensity (EC 2010).

The first European SD Strategy (EU SDS) was adopted at the European Council Meeting in Gothenburg (Sweden) in 2010 and aimed at complementing the Lisbon Strategy by addressing environmental issues and thus at achieving the European Union's general objective of SD. While the first EU SDS focuses on decoupling economic growth from resources use, the 2006 renewed EU SDS adds a number of priority areas of action to this general objective. These include: climate change; sustainable transport; sustainable production and consumption; conservation and management of natural resources; public health; social inclusion, demography and migration; and global poverty and SD challenges. Analysing the main objectives of the Lisbon Strategy and the EU SDS, one can see that the

revised versions of the strategies have achieved more coherence since their initiation. The EU SDS concentrates on the ‘quality of economic growth’, which includes the distributive part of economic growth, social inclusion and environmental protection. The Lisbon Strategy mainly focuses on increasing competitiveness and economic growth and on enhancing job creation. In its 2010 evaluation, the EC (2010) recognized that key decisions on climate change and energy (e.g. the so-called 20-20-20 targets) were taken outside the context of the Lisbon Strategy, emphasizing that the Strategy might not (yet) be as comprehensive as wished for.

Generally speaking, the relationship between the EU SDS and the Lisbon Strategy is extremely ambiguous, as the European Commission gives contradictory signals with regard to priorities and ‘overarching’ objectives. Tanasescu (2006) states that the inconsistencies between the two strategies could originate in the differences in scope and operational level that existed from the outset, as ‘*The Lisbon Strategy thus focuses first and foremost on economic growth and social cohesion and sets time-bound and quantitative targets in these areas while the Gothenburg strategy—the EU SDS—is a much broader and long-termed strategy*’. In its recent evaluation, the European Commission (2010) states that the strategies were kept separate due to the different time focus (a medium term perspective (5–10 years) for Lisbon and a time horizon of several decades for the EU SDS).

Nevertheless, the fact that this imbalance was not only not addressed in the review of both strategies, but was further accentuated in the decoupling of their periodic assessment, is an indication of the lack of political will to make SD the real priority.

The European Union will soon devise a new strategy for the period beyond (‘post’) 2010. This new strategy should enable the EU to make a full recovery from the crisis and help speed up the move towards a greener, more sustainable and more innovative economy. To make this transformation happen, Europe needs a common agenda: the EU 2020 strategy (European Commission 2010). Furthermore, the Strategic Framework of the 2010–2011 trio presidency of the European Council (Spain, Belgium, Hungary) stresses that the post 2010 Strategy should incorporate the guiding principles of SD, *inter alia* a low carbon economy (European Union 2009). Similarly, the European Commission recently recognised that the links between the Lisbon Strategy and the EU SDS have not been sufficiently strong and recommends solving this so as to improve policy effectiveness (EC 2010).

Despite inconsistencies and drawbacks, there are clear signs that the European high-level discourses converge. This is apparent in the quest for an increased synergy between the Lisbon Strategy and the EU SD Strategy. However, this is mainly visible in lip service paid to these synergies, and several political inconsistencies and biases remain, while at the same time, implementation seems to lag behind. But what’s the link to impact assessment?

To help solve these inconsistencies between the European SD agenda and the Lisbon agenda, Impact Assessment is presented by the European Commission as a tool that will contribute to the strategic agendas’ integration. The European Commission’s Impact Assessment Guidelines (EC 2009) state that Impact Assessment ‘*helps to ensure coherence of Commission policies and consistency with Treaty objectives such as the respect for Fundamental Rights and high level objectives such as the Lisbon or SD strategies*’.

Impact Assessment should ideally offer a balanced account of the likely economic, social and environmental impacts of all major policy initiatives, going beyond the question of whether Lisbon or the EU SD Strategy is the overarching strategy. The European Commission thus drops the distinction between regulatory impact analysis (RIA) and sustainability assessment (SA). Instead both approaches are merged in order to contribute to the achievement of both the better regulation and the SD agendas. This is apparent in the

definition given by the EC (2009): *‘Impact Assessment is a set of logical steps to be followed when you prepare policy proposals. It is a process that prepares evidence for political decision-makers on the advantages and disadvantages of possible policy options by assessing their potential impacts.’* The objectives that were identified in the RIA and SA literature are now fostered together, as the EC’s Impact Assessment should:

- *Help the EU institutions to design better policies and laws;*
- *Facilitate better-informed decision making throughout the legislative process.*

When it comes to analysing the impacts, we can again clearly identify RIA and SA elements in the EC Impact Assessment Guidelines, as Impact Assessment is expected to:

- *Identify (direct and indirect) economic, social and environmental impacts and how they occur;*
- *Identify and assess administrative burden/simplification benefits (or provide a justification of this is not done).*

Tanasescu (2009) lists the steps that led to the last (2009) version of the EC’s Impact Assessment guidelines. The first guidelines date from 2003, the EC revised them in 2005 and updated them again in 2006, when the decision was taken to create an Impact Assessment Board. The most recent version of the guidelines dates from March 2009, and follows an evaluation performed by TEP (2007). TEP (2007) states that the Commission Impact Assessment system would have three main objectives—which are common to RIA and SA:

- to improve the quality of the Commission proposals;
- to provide an effective aid to decision-making;
- to serve as a valuable communication tool.

Ultimately, the achievement of these key objectives should contribute to a better, simpler and more consistent regulatory environment that helps the European Union to meet the objectives of the Lisbon and SD Strategies.

This document analysis shows that political discourses, embodied by high-level strategies, political declarations and Communications from the European Commission increasingly converge despite numerous ambiguities, yet fail to become operational. The European Commission wishes to translate this convergence to the operational level through the application of Impact Assessment Guidelines, which now explicitly aim to realise both the Lisbon and Gothenburg policy agendas. Other authors such as Bäcklund (2009) emphasize even other policy objectives set forward by the EC: Impact Assessment is also expected to improve legitimacy of government and to increase unity in European politics.

The practical results of the application of Impact Assessment have been mixed until now. A number of studies analysed its various aspects (see Tanasescu 2009 for an overview). But as Bäcklund (2009) states: one has to keep in mind that: *‘Impact Assessment is a political instrument shaped by its multiple objectives and the political context of permanent negotiations in which it is situated.’* The narrative analysis outlined in Sect. 4.1 does not preclude a critical look at the ‘messiness’ of actual decision-making processes (see Sect. 6.1), as impact assessments are not performed in isolation, but ultimately depend on the institutional context.

4.2 Converging discourses and impact assessment in the Flemish region of Belgium

Since the 1970s, Belgium has evolved into a federal state, which granted important legislative powers to the sub-national entities such as the Flemish Region. The regional

parliaments and governments have the competence over important policy areas such as economic, employment and energy policy, environment, housing and urban planning, public works and transport, agriculture, education etc. As a sub-national actor, the Flemish Region has launched broad strategic initiatives in recent years; both in the field of competitiveness and economic development and in field of SD. Although not explicitly linked to the European-level initiatives, the challenges that led to respectively the 'Pact 2020' and the 'Flemish SD Strategy' are in many ways similar to the context that triggered the drafting of the European Lisbon and Gothenburg strategies.

The so-called 'Pact 2020' outlines objectives for the future development of the Flemish Region. Pact 2020 reflects the shared long-term vision and strategy of the Flemish government and the social partners (employers, labour unions) within the frame of the 'Flanders in Action' initiative. The Pact wants to stimulate a 'societal dynamic for action and change' so as to position Flanders amongst the European front-running regions with regard to economic, social and ecological aspects. The keywords supporting the strategy are wealth creation, inclusion and sustainability. While the first two aspects are clearly in line with the objectives of the European Lisbon strategy, the sustainability aspect is clarified through the aspirational idea of 'a circular economy' with a reduced commodities, energy, material and space use and an environmental impact that is as low as possible. The strategy also presents four priority topics: 1. a competitive and sustainable economy, 2. more people at work, with qualitative jobs and longer careers, 3. high quality of life; 4. efficient governance (SERV 2009a). These ambitions are translated into 20 objectives, and a number of these embody a holistic, sustainable vision of the future. These objectives include: Flanders should become a sustainable top-region; eco-efficiency needs to be stimulated; environmental indicators must be amongst the best in Europe; biodiversity needs to be preserved etc. Next to the comprehensive Pact 2020 strategy, the Flemish Region is one of the few regions in Europe that came up with an own, explicitly Lisbon-inspired Flemish Programme of Reform, that was endorsed by the regional government in October 2005. In its associated yearly 'Lisbon Reports', the Flemish Government demands to put more emphasis on sustainability, through a stronger focus on 'sustainable growth and jobs' (Flemish Government 2009).

Thus, it appears that the sustainability dimension is strongly present in the Flemish strategic discourse, yet the interpretation of the concept of sustainability sometimes seems (over-)stretched.

SD is part of the Flemish Region's competences. This was translated into a 2008 regional law, aiming at guaranteeing the continuity of Flemish SD policy (Flemish Parliament 2008). This law makes the periodic drafting of a strategy note reflecting the Flemish SD Strategy (SDS) compulsory. The Flemish Region committed itself to draft a SDS at the 2002 World Summit for SD.

The first Flemish SD Strategy was adopted in July 2006. It provides the framework for Flanders' sustainability policy. The Strategy builds on seven key issues: poverty and social exclusion, ageing population structure, climate change, mobility and transport, spatial planning, sustainable natural resources management, combating health risks. The process aspects of SD (governance) are also taken into account (Flemish Government 2006).

The Flemish SD Strategy is explicitly inspired from the European SD Strategy. The Pact 2020 was drafted more recently and fits well in the global rise of the 'green economy' discourse, carried amongst other by the United Nations (UNEP 2008), as it calls for synergies between competitiveness objectives and broader sustainability objectives.

But is this discursive evolution being translated to the operational level? And what are the linkages with impact assessment? The Flemish Region has different impact assessment

schemes in place, each with their own specificities and objectives. These schemes include Environmental Impact Assessment, Strategic Environmental Assessment and Regulatory Impact Assessment. For now, there is no integrated impact assessment scheme similar to the European Impact Assessment scheme. But, under the influence of the discursive shifts outlined above, this situation is changing.

Indeed, the 2006 Regional Strategy for SD explicitly calls for steps towards integrated impact assessment for SD. Literally, it calls '*...to examine the possibility to carry out an analysis of the economic, social, environmental and administrative impacts of policy measures, in Flanders and on a global scale.*' The idea to analyse sustainability impacts and administrative impacts in one impact assessment tool is relatively recent (the Flemish SDS dates from 2006), but it builds both on the strategic dynamics outlined above—the links between Pact 2020 and the SDS—as on dynamics at the administrative level.

In order to have an idea of these 'lower level' dynamics, we analysed policy documents shedding a light on the way the Flemish Region's official opinions with regard to relevant European initiatives is being formed. In June 2008, the European Commission initiated a consultation process concerning the reform of the European Impact Assessment Guidelines. This reform process ultimately led to the newest version of the Guidelines (issued in January 2009).

The Flemish Administration issued a communication to the Flemish Regional Government where it clarifies its opinion with regard to the proposed EC Impact Assessment Guidelines (Flemish Government 2008). This communication stresses the need for a balance between economic, social and ecological aspects and reflects the worries of the administrations that EC Impact Assessments still overemphasise the sole economic dimension. The communication further states '*It is both a methodological problem and a capacity problem in the concerned services.*'

Similarly, the viewpoint of the Flemish Government with regard to the Midterm Review of the Lisbon Strategy (2004–2005) already reflects the sustainability concern in strong words: '*Flanders can only agree to narrow the scope of the Lisbon Strategy to an economic strategy for growth and jobs if the European SD Strategy is used as the all-encompassing and coordinating strategy.*' In that 2005 Communication, the Flemish Government also demands '*to adjust the European Impact Assessment as to assess the economic, social and ecological dimension of the Lisbon Strategy*' (Flemish Government 2005). This is in line with the more or less concomitant 2004 European Commission Staff Working Paper 'Impact Assessments: Next Steps', which states that '*SD objectives and Lisbon objectives are to be firmly anchored in the assessments*', thus pointing to the (need for) practical coordination of the two strategies via the Impact Assessment Tool (Tanasescu 2009).

In May 2009, the Flemish Minister-President issued a communication to the Flemish Government, clarifying the first steps in the development of a Flemish vision on the European post-2010 Lisbon strategy (Flemish Government 2009). This document was issued before the European Commission's official proposal for the new Lisbon strategy, and can thus be considered to be an unconstrained reflection of the opinion of the Flemish Government. Flanders, as a region both in the federal state of Belgium and as a member of the European Committee of the Regions, stresses SD throughout this communication. Concretely, it states that '*the Flemish Region wants to focus on sustainability in the post 2010 Lisbon Strategy*'; '*The complementarity between the European SD Strategy and the Lisbon Strategy should not be forgotten...as both strategies aim at supporting structural changes in the member states' economies for them to be able to cope with the challenges of globalisation*'; '*Innovation must provide an answer to the necessary shift to a sustainable society*'. On an operational level, Flanders calls to adapt the existing set of Lisbon

indicators to firmly anchor the sustainability dimension in the monitoring process. These quotes sound ambitious and promising, but one should be aware that these are recommendations aimed at the European level, and are not to be realised directly by the Flemish policy-makers. Nevertheless, this anthology of ambitions and ideas fostering a synergy of competitiveness and sustainability reveals a powerful sense of urgency.

However, when briefly mentioning the Flemish RIA in this communication, the Flemish Government (2009) fails to link this process to SD and only provides a narrow RIA-interpretation focussing exclusively on the reduction of the administrative burden. This is somewhat surprising, as the Flemish Government proposes to introduce a ‘sustainability test’ as a part of the new Lisbon Strategy. Furthermore, the use of evaluations is mentioned, but again through a narrow ‘*efficiency and effectiveness of public administration*’ prism.

This original Flemish proposal for ‘a sustainability test’ is not linked to the Flemish RIA nor to the European Impact Assessment framework. Apparently, there is no lack of ideas, but there is still a coordination problem when it comes to make transversal issues such as SD operational. In another Communication concerning the Flemish priorities for the Belgian presidency of the European Union in 2010, the Flemish Government again stresses sustainability as the basis for the updated Lisbon Strategy. Similarly, Flanders’ response to the consultation process of the European Committee of the Regions stresses the need for a ‘*reorientation (of the Lisbon Strategy) towards sustainability*’ (Flemish Government 2009b).

5 Regulatory impact assessment in the Flemish region of Belgium

The narrative analysis of recent Flemish official documents reflecting the regional government’s opinion on European initiatives is illustrative for the state-of-mind surrounding the integration of the better regulation agenda and the SD agenda. Whereas at the European level, the Impact Assessment guidelines explicitly call for an integration of these both agendas through the very application of Impact Assessment, this is not yet the case in Flanders. In this section, we will analyse the Flemish RIA system as to get an idea of the potential of the approach to foster SD and to be reformed into an integrated assessment approach. This is a logical step, as Flanders does not currently have an officially endorsed SA framework.

During the 1990s, concern grew that the quality of legislation in Flanders might suffer from the plethora of regulations, which would ultimately reduce the effectiveness of government interventions (Van Humbeeck 2007). In response to that, the RIA system was introduced in 2005 through the circular 2004/13 of the Flemish Government, as a result of the set up of a Regulatory Control Unit. The 2004–2009 Flemish Government emphasised three main objectives that RIA should pursue: 1. better policy preparation, 2. increased transparency and 3. policy coordination.

Other objectives put forward in the preparatory phase (Flemish Government 2004), such as ‘*RIA as an instrument for balanced decision-making*’ were not considered a priority by 2005. Apparently, the link with SD was not clarified from the onset.

Since January 1st 2005, every regulatory initiative having a regulating impact on citizens, business or non-profit organisations is subject to a RIA in Flanders. This includes all draft regional laws, with a few formal exceptions (Flemish Government, 2006).

In the RIA Guidance (Flemish Government, 2006), RIA is presented as ‘*a structured analysis of the impacts of planned regulation or of a policy measure in general. It consists*

Table 1 Key elements of a RIA in the Flemish region of Belgium (Flemish Government, 2006)

Title
Motivation and objective
Options
Impacts
Elaboration, implementation, administrative burden, compliance and evaluation
Consultation
Information for the financial inspection
Summary
Contact information

of a development process and of a document drafted in line with the present RIA guidance'. This generic definition of an impact assessment process is specified in the next section of the guidance: by applying a RIA, the Flemish Government wishes '*to propose regulations only after an assessment of its need and effectiveness and after having obtained a clear view on its likely impacts. It wishes to moderate the costs of implementation and enforcement. It wishes that regulation in one policy area takes the impacts on the realisation of objectives in other policy areas into account*'. The key elements of a RIA as stated in the RIA Guidance are outlined in Table 1.

It is clear throughout the guidance that RIA is first and foremost a process of assessment and (limited) consultation, intended to start early in the decision-making process. SD impacts are mentioned in a very careful way in the Flemish RIA Guidance. The Guidance uses an approach focussing on target groups and effected stakeholders, and distribution issues are central.

Section five of the guidance states: '*The RIA aims to ensure that the planned regulation has no negative impact on the potential to realise SD. This means that—if needed—the likely social, economic and environmental impacts for current and future generations need to be mapped*'. This cautious wording contrasts with the last version of the European Impact Assessment Guidelines (European Commission, 2009) stating that an Impact Assessment should '*identify (direct and indirect) economic, social and environmental impacts and how they occur (causality)*'. The 2006 Flemish RIA Guidance, although mentioning the three pillars of SD, tends to show a bias towards (economic) competitiveness impacts. Recently however, there have been signs of a shifting interpretation of RIA, for instance, the '*Flemish Inter-Institutional Agreement on a common approach and application of RIA*' fosters the use of RIA as a central deliberation and assessment instrument between the government, the parliament and the advisory councils. RIA is presented as an instrument to achieve the Lisbon objectives, good governance and SD objectives as well as better regulation (SERV 2009b).

But how does the Flemish RIA system work in practice? The Flemish RIA system has been evaluated internally and externally a number of times since its initiation (Van Humbeek 2007). Without going into detail, the design of the RIA system scores well. The broad scope, the formal guidance, the focus on cost-benefit analysis, the wide array of impacts that need to be analysed in principle, the demand for quantification, and the quality control are all considered to be positive elements. When it comes to the RIA process, the score is less satisfactory. There is a lack of transparency concerning the dissemination of results and concerning quality control, as well as a lack of *ex post* evaluation of the performed RIAs. Concerning SD impacts, Van Humbeek (2007) found that in 2005 and

2006, only 15% of the 46 analysed RIAs, took the social and environmental aspects of SD into account. The most recent RIA evaluation dates back to the summer of 2009. A fair number of past recommendations have been taken into account: the RIA database increases transparency, the regional Parliament gets a more important role etc. It is harder to get rid of the somewhat negative SD connotation surrounding RIA, despite the fact that the Flemish RIA seems to have evolved positively between the 2007 and 2009 evaluations. The successive evaluations have led to gradual improvements in both guidance and practice. A next reform of the RIA is coming up, and as observed by the Legislation Quality Unit (pers. comm.), civil society is also demanding this reform.

6 Towards an impact assessment framework for sustainable development in Flanders

6.1 Discourse, impact assessment and the reality decision-making

The analysis presented in this paper links the convergence between policy discourses on better regulation and sustainable development to the emergence of integrated impact assessment processes, and the next Sect. (6.2) provides tangible arguments to support the RIA-based emergence of integrated impact assessment in Flanders. These arguments can be an inspiration for other jurisdictions. Although the scope of this paper does not encompass an in-depth analysis of the array of functions of impact assessment exercises in decision-making, it is necessary to warn for an overly simplified ‘linear’ perspective on decision-making in which impact assessment provides information to decision-makers who subsequently use this information directly to improve the quality of future decisions. Indeed, information and knowledge can feed into decision-making in various ways. Holder (2004) for instance, makes a distinction between the ‘information theory’, which focuses on the informing role of IA, and the ‘culture theory’ which emphasises attitude changes and new perspectives brought about by IA. In the context of this paper, it is enough to keep in mind that these secondary ‘learning effects’ are as or even more important than direct information provision by IA. To say it with the words of Nooteboom (2007): *‘The effect of an (impact) assessment procedure may well be that it will mainly benefit future decisions, while having a more limited impact on the decisions which the impact assessment was meant to inform and influence’*.

6.2 IA for SD in Flanders: RIA as a starting point?

Structural similarities between RIA and SA (Sect. 3), together with the observed discursive evolutions both at the EU level and at the Flemish level (Sect. 4) and with the characteristics of the current Flemish RIA system (Sect. 5), all contribute to create a window of opportunity to introduce an integrated impact assessment framework in Flanders. Instead of introducing a brand new assessment approach, the existing RIA scheme can be used as a starting point to turn it into an integrated impact assessment framework fostering SD. Although the detailed implementation of RIA’s potential in Flanders is subject to further research, this stance is based on four key premises that are explored in the following sections:

- the learning potential embodied in the existing RIA framework;
- the effectiveness and efficiency of building onto existing frameworks;

- the political discourse in the EU and in Flanders;
- the experience of the European Commission's Impact Assessment scheme.

6.2.1 Learning potential embodied in the existing RIA framework

Many institutions and scholars (e.g. Jha-Thakur et al. 2009) acknowledge that introducing and applying (any) impact assessment framework is a gradual learning process. Concerning RIA, the OECD (2006) rightly states: '*RIA implementation is a long-term process which necessarily requires significant cultural changes to take place throughout the government policy-making apparatus*'. The European Mandelkern Report (2001) also points to the evolutionary character of RIA, and the European Impact Assessment Board notes a steady improvement in the application of the EC's Impact Assessment Guidelines. The learning process in applying assessments is thus emphasised (EC 2009 b). Similarly, Van Humbeeck (2007) looks beyond the poor quality of a series of early Flemish RIAs, and stresses the gradual improvement in RIA quality and influence. Indeed, in the early phases, the potential of impact assessment lies essentially in raising awareness amongst policy-makers with regard to the shortcomings of the decision-making process and its results.

In the same vein, Luks and Siebenhüner (2007) mention that impact assessment methods also percolate only slowly into the policy-makers' minds and habits.

As many Van Humbeeck (2007) stresses '*the value of RIA as a process rather than as an analytical tool*', the challenge lies in avoiding the sometimes negative SD connotation surrounding the (Flemish) RIA process; as well as in turning its strong points into an opportunity for improving the assessment practice. Historically, RIA still carries with it the ideological label of avoiding public regulation and sparing business without taking other interests into account. This can be explained by the genesis of RIA in Flanders, as the compensation rule for administrative burden was introduced at the same time as the RIA in 2005.

However, given the gradual acceptance of RIA by Flemish stakeholders and the ongoing learning process, it is advised to reframe and reform the current RIA system instead of introducing a brand new framework. This position is supported by two-thirds of the Flemish stakeholders consulted by the authors in the survey (see Sect. 2), as these stakeholders were in favour of strong linkages between RIA and any sustainability assessment process to be introduced.

6.2.2 Effectiveness and efficiency

Besides the intention not to hamper the ongoing learning process in Flanders, using RIA as a starting point to introduce integrated impact assessment fostering SD is also a matter of effectiveness and efficiency. It is also in line with the Flemish Government's decision to embed every existing and future *ex ante* assessment in the RIA system so as to ensure no extra administrative burden would slow down decision-making and so as to keep the structure of impact assessment(s) as convenient as possible. Hence, it is not indicated to introduce a completely new *ex ante* assessment in Flanders. Increased fragmentation would be contradictory to the trend of using integrated assessments to get a grip on the complexity of public decision-making. As fragmentation increases the risk of biased decision-making, it is more efficient to incorporate existing tests in one integrated assessment (Jacobs 2006; Van Humbeeck 2007). Furthermore, as shown in the analysis of Jacob et al. (2007), there is

a trend to integrate environmental appraisal into existing regulatory appraisal schemes. This is both a response to the integrative character of the SD agenda and to the proliferation of impact assessment procedures.

6.2.3 Political discourse in the EU and in Flanders

As outlined in Sect. 4, one of the main reasons to work towards an integrated impact assessment for SD is that it would enable to turn abstract policy objectives into concrete realizations. The narrative discourse analysis outlined in Sect. 4 supports this view. Indeed, as the Flemish Government (2006a) states, it strives towards ‘*an empirical base and a quantitative measurement of the impacts, to identify (in)direct environmental, social and economic consequences and to take these into account in the ultimate choice between different options*’. The analysis of Flemish opinions with regard to European initiatives (Sect. 4) shows that the Flemish Government (2008) thinks that insufficient attention is granted to social and environmental impacts in the EC’s IA. Integrated impact assessment is expected to solve this by considering all relevant SD impacts into one process. This statement is also apparent in the European Commission’s discourse.

6.2.4 The European commission’s impact assessment experience

The introduction of impact assessment for SD in Flanders is linked to international evolutions. At the European Union level, Impact Assessment is not limited to regulation, but can be applied to all major policy decisions, and ideally starts at the earliest phase of decision-making. Furthermore, the EC’s Impact Assessment has a positive connotation when it comes to assessing SD impacts, although the practical results are mixed until now (TEP 2007). The EC’s IA Guidelines also theoretically ensure a flexible application of impact assessment, as the legal form of the regulation is not what matters most. Instead, the emphasis lies on the contents. Harmonizing practices between the EU level and the (sub-)national level is another important argument. Renda (2009) says: ‘*...placing the emphasis only on the EU level would miss the broader picture of better regulation in Europe. (...) In this respect, a degree of convergence between the EU and national IA systems would also entail that EU IAs serve as a basis for implementation in member states, and that impact assessment can be performed at national level as an ‘add-on’ to what the European Commission has analyzed in its own IA document. Achieving convergence between the EU and national better regulation systems should thus be considered as a key priority*’ We would like to add the SD dimension to this assertion, and we would like to explicitly refer to the existing European Impact Assessment Guidelines, as these can be both a source of inspiration and a logical step with regard to European integration.

Experience from other European countries show that (timid) steps are taken to realise a synergy between better regulation and SD, albeit SD is often not made explicit and albeit RIA is often not (yet) presented as an instrument that can contribute to the institutionalisation of SD. In the field of policy supporting instruments where impact assessments take up their role in the policy preparation process, day-to-day practice reflects the strategic discourse that is slowly spreading from the European Commission to the member states and (some of) their (sub-)national entities. However, one has to keep in mind that the 2009 financial crisis and the subsequent budget deficits created a strong suspicion with regard to any initiative that is perceived as bringing more administrative burden. Similarly, the EC’s IA system is not flawless and implementation still shows flaws, yet analysing the EC’s experience is an essential input in the Flemish IA debate.

7 Conclusions

Impact assessment is an idea and a process that can be interpreted in many ways. Its interpretation and practice are constantly evolving and the way it is used and applied is the result of political and societal choices. In the Flemish Region of Belgium, evolving discourse triggers a focus shift from the initial economic and deregulation bias of RIA towards a broader approach sharing characteristics of the European Impact Assessment system. This shift can be explained through practical experiences, evaluations and reflections, but at a strategic level, it is the result of shifting discourses and societal dynamics. The converging objectives of SA and RIA have the potential to lead to the emergence of a Flemish integrated impact assessment. The ongoing learning process surrounding RIA and the effectiveness and efficiency argument are strong elements supporting the introduction of integrated impact assessment by taking RIA as a starting point.

An important finding of this paper is that the current window of opportunity to introduce an integrated impact assessment scheme fostering SD in the Flemish Region is not a direct consequence of SD policy, but instead arises from the reform of an instrument that was initially framed as an instrument essentially fostering better regulation, the RIA.

When introducing an integrated impact assessment scheme, one can thus not only build on arguments centred on SD as such, but one also needs to use windows of opportunity that might have seemed un-linked to the subject before discursive shifts had occurred at various decision-making levels.

The initial cold feet to link both processes (RIA and SA) can be explained by their different origins and traditions, but this perception of incompatibility is fading. Next to the evolutions of the RIA and SA approaches as such, the EC's decision to implement the European better regulation agenda and the European SD agenda through the use of one integrated impact assessment tool has certainly contributed to this evolution.

Reforming the Flemish RIA is one important step, but this does not preclude actors to have diverging interpretations of impact assessment. Impact assessment can also be a flexible approach in the realization of deliberative governance. The key objective of impact analysis is to help policy-makers to structure policy issues and ultimately, to frame policy issues differently. However, changing policy-making routines is very demanding.

Introducing a Flemish integrated impact assessment may not be an easy task, but the European experience proves that it is possible. A pro-active stance may turn the Flemish Region into a frontrunner in integrated impact assessment fostering SD. This is an encouraging perspective.

References

- Bäcklund, A. K. (2009). Impact assessment in the European Commission—a system with multiple objectives. *Environmental Science and Policy*, 12, 1077–1087.
- Barry, J., & Proops, J. (1999). Seeking sustainability discourses with Q methodology. *Ecological Economics*, 28, 337–345.
- BMI. (2009). *Guidance for impact assessment. German interior ministry (in German)* http://www.bmi.bund.de/cae/servlet/contentblob/565864/publicationFile/31426/ah_gfa.pdf.
- DBR. (2004). *A comparative analysis of regulatory impact assessment in ten EU countries. A report prepared for the EU directors of better regulation group. Italian, Irish and Dutch presidencies of the Council of the European Union.* Foromez, Italy. http://www.betterregulation.ie/attached_files/Pdfs/Report%20on%20RIA%20in%20the%20EUa.pdf.

- Devuyts, D., Hens, L., & De Lannoy, W. (2001). *How green is the city? Sustainability assessment and the management of urban environments* (p. 457). New York: Columbia University Press.
- European Commission. (2009a). Impact assessment guidelines. SEC (2009) 92. http://ec.europa.eu/governance/impact/docs_en.htm.
- European Commission. (2009b). *Impact assessment board report 2008. commission staff document accompanying the communication from the commission to the European Parliament, the council, the European economic and social committee and the committee of the regions*. Third strategic review of better regulation in the European Union. http://ec.europa.eu/governance/impact/key_en.htm.
- European Commission. (2010). *Lisbon Strategy Evaluation Document*. Commission Staff Working Document. http://ec.europa.eu/growthandjobs/pdf/lisbon_strategy_evaluation_en.pdf.
- Flemish Government. (2004). *Note on regulatory impact assessment 2004/13* (in Dutch).
- Flemish Government. (2005). *Note to the Flemish Government. concerning: Lisbon strategy, Mid-term review—addendum to the standpoint of the Flemish Government of 24 Nov 2006* (in Dutch).
- Flemish Government. (2006a). *Moving boundaries together. The Flemish regional strategy for SD* (in Dutch). Flemish Government.
- Flemish Government. (2006b). *Guidance for regulatory impact analysis* (in Dutch). Flemish Government.
- Flemish Government. (2008). *Communication to the members of the Flemish Government. Concerning: Draft Flemish standpoint w.r.t. the consultation on the draft Impact Assessment Guidance of the European Commission* (in Dutch). VR 2008 1807 MED. 0383.
- Flemish Government. (2009). *Medeling aan de Vlaamse Regering. Betreft: Eerste aanzet van visie van de Vlaamse Overheid m.b.t. de Lissabonstrategie na 2010. Minister-president van de Vlaamse Regering*.
- Flemish Government. (2009b). *Flemish Lisbon Report 2009. Communication to the Flemish Government*. (in Dutch) http://www.vlaandereninactie.be/nlapps/data/docattachments/vlaamse_lissabonstrategie_2009_volledig.pdf Last Accessed on 6 Aug 2010.
- Flemish Parliament. (2008). *Regional Law on SD* (in Dutch). <http://do.vlaanderen.be/nlapps/data/docattachments/Decreet%206-09-2008.pdf>. Last Accessed on 6 Aug 2010.
- German Federal Government. (2008). Progress Report 2008 on the National Strategy for SD. 'For a sustainable Germany'.
- Gibson, R. (2005). *Sustainability Assessment—Criteria and Process*. Earthscan.
- Gibson, R. (2006). Beyond the pillars: Sustainability assessment as a framework for effective integration of social, economic and ecological considerations in significant decision-making. *Journal of Environmental Assessment Policy and Management*, 8(3), 69–80.
- Hacking, T., & Guthrie, P. (2006). SD objectives in impact assessment. Where do they come from? *Journal of Environmental Assessment Policy and Management*, 8(3), 341–371.
- Hardi, P., & Zdan, T. (1997). *Assessing sustainable development: Principles in practice. International institute for sustainable development*. <http://www.nssd.net/pdf/bellagio.pdf>. Last Accessed 23 Nov 2010.
- Hertin, J., Jacob, K., & Volkery, A. (2008). Policy appraisal. In: Jordan, A., Lenschow, A. (eds.), *Innovation in Environmental Policy? Integrating environment for sustainability*. Cheltenham, UK: Edward Elgar Publishing Inc.
- Hertin, J., Turnpenny, J., Jordan, A., Nilsson, M., Russell, D., & Nykvist, B. (2009). Rationalising the policy mess? Ex ante policy assessment and the utilisation of knowledge in the policy process. *Environment and Planning A*, 41(5), 1185–1200.
- Holder, J. (2004). *Environmental assessment: The regulation of decision-making*. United Kingdom: Oxford University Press.
- Hugé, J., & Hens, L. (2007). Sustainability assessment of poverty reduction strategy papers. *Impact Assessment and Project Appraisal*, 25(4), 247–258.
- IAIA. (2009). *What is impact assessment?* http://www.iaia.org/publicdocuments/special-publications/What_is_IA_web.pdf. Last Accessed on 23 Nov 2010.
- Jacob, K., Hertin, J., & Volkery, A. (2007). Considering environmental aspects in integrated impact assessment: Lessons learned. In: George, C. & Kirkpatrick, C. (eds.), *Impact assessment and SD. European Practice and Experience: 90–105*. Cheltenham, UK.
- Jacobs, S. (2006). *Current Trends in Regulatory Impact Analysis: The Challenges of Mainstreaming RIA into Policy-making*. Washington DC: Jacobs & Associates Inc. <http://www.regulatoryreform.com/pdfs/Current%20Trends%20and%20Processes%20in%20RIA%20-%20May%202006%20Jacobs%20and%20Associates.pdf> Last Accessed 10 Aug 2010.
- Jha-Thakur, U., Gazzola, P., Peel, D., Fischer, T., & Kidd, S. (2009). Effectiveness of strategic environmental assessment—the significance of learning. *Impact Assessment and Project Appraisal*, 27, 133–144.

- Kirkpatrick, C., & Lee, N. (2002). Further development of the methodology for a sustainability impact assessment of proposed WTO negotiations. Final report to the European commission. Institute for development policy and management. University of Manchester. April 2002.
- Lee, N. (2006). Bridging the gap between theory and practice in integrated assessment. *Environmental Impact Assessment Review*, 26, 57–68.
- Luks, F., & Siebenhüner, B. (2007). Transdisciplinarity for social learning? The contribution of the German socio-ecological research initiative to sustainability governance. *Ecological Economics*, 63, 418–426.
- Mandelkern Group on Better Regulation. (2001). Final report. 13 Nov 2001. Brussels.
- Morrisson-Saunders, A., & Fischer, T. (2006). What is wrong with EIA and SEA anyway? A sceptic's perspective on sustainability assessment. *Journal of Environmental Assessment Policy and Management*, 8, 19–39.
- Nooteboom, S. (2007). Impact assessment procedures for sustainable development: A complexity theory perspective. *Environmental Impact Assessment Review*, 22, 3–16.
- OECD. (2006). *Maximising the impact of regulatory impact analysis on regulatory quality*. Paris: OECD.
- PODDO. (2009). Sustainability assessment. belgian federal public service for sustainable development (In French and in Dutch). <http://www.poddo.be/NL/instrumenten/doeb> Last Accessed 23 Nov 2010.
- Pope, J. (2006). What's so special about sustainability assessment? Editorial. *Journal of Environmental Policy and Management*, 8(3), v–x.
- Pope, J., Morrison-Saunders, A., & Annandale, D. (2005). Applying sustainability assessment models. *Impact Assessment and Project Appraisal*, 23(4), 293–302.
- Radaelli, C. M. (2007). Whither better regulation for the Lisbon agenda? *Journal of European Public Policy*, 14(2), 190–207.
- Renda, A. (2009). Better regulation. In Policy-making in the European Union: *Achievements, challenges and proposals for reform*. CEPS Paper back. June 2009.
- Robinson, J. (2004). Squaring the circle? Some thoughts on the idea of sustainable development. *Ecological Economics*, 48, 369–384.
- Runhaar, H., Dieperink, C., & Driessen, P. (2005). *Policy analysis for sustainable development—Complexities and methodological responses*. Paper for the Workshop on Complexity and Policy Analysis. Cork, Ireland, 22–24 June 2005.
- Scrase, J. I., & Sheate, W. R. (2002). Integration and integrated approaches to assessment: What do they mean for the environment? *Journal of Environmental Policy and Planning*, 4, 275–294.
- Sedlacko, M., & Gjoksi, N. (2009). *Sustainable development and economic growth: Overview and reflections on initiatives in Europe and beyond*. European Sustainable Development Network Quarterly Report. Dec 2009.
- SERV. (2009a). *Pact 2020: A new plan for the future of Flanders. 20 objectives*. Social-Economic Council of Flanders (in Dutch). Jan 2009. <http://www.serv.be/uitgaven/1450.pdf>.
- SERV. (2009b). *Inter-Institutional Agreement (IIA) between the Flemish Parliament, the Flemish Government, the Socio-Economic Council for Flanders and the Strategic Advisory Boards on a common approach to Regulatory Impact Analysis (RIA)* (in Dutch). <http://www.serv.be/uitgaven/1467.pdf>.
- Tanasescu, I. (2006). Competitiveness and environmental policy: A failed marriage? *Journal of Contemporary European Research*, 2(1), 92–104.
- Tanasescu, I. (2009). *Stakeholder involvement in the impact assessment procedure at the EU level. The European commission and interest groups—towards a deliberative interpretation of stakeholder involvement in EU Policy-Making*. (p. 285). Brussels: VUB Press.
- TEP. (2007). *Evaluation of the commission's impact assessment system*. Final Report—Executive Summary. The Evaluation Partnership. http://ec.europa.eu/governance/impact/docs/key_docs/tep_eias_final_report_executive_summary_en.pdf.
- UNEP. (2008). *Global Green New Deal—UNEP Green Economy Initiative*. Beschikbaar op: <http://www.unep.org/Documents/Multilingual/Default.asp?DocumentID=548&ArticleID=5955&l=en>.
- Van Humbeek, P. (2007). *Best practices in regulatory impact analysis: A review of the Flemish Region in Belgium*. Social Economic Council of Flanders (SERV). Working Paper. Feb 2007.
- Wachter, D. 2005. *Sustainability assessment in Switzerland: From theory to practice*. EASY-ECO 1st Conference. Manchester, United Kingdom. 15–17 June 2005.
- WCED. (1987). *Report of the world commission on environment and development*. General Assembly Resolution 42/187. 11 Dec 1987.
- Wilkins, H. (2003). The need for subjectivity in EIA: Discourse as a tool for sustainable development. *Environmental Impact Assessment Review*, 23, 401–414.