



BlueAdapt

**How policy instruments come (not) to have consequences:
a new perspective to document analysis**

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The era of open-ended policy processes

- Environmental policy instruments often leave space for case- or region-specific discretion
 - But what are the features that should matter for policy discretion?
 - What means are used to identify policy-relevant characteristics?
- Where responsibilities for environmental action become located?
- In what terms options are configured as being open?

DOING DOCUMENT ANALYSIS

A Practice-Oriented Method



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The co-evolution of policy realities and environmental liabilities: Analysing the ontological work of policy documents

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ABSTRACT

Environmental policies often leave room for case- or region-specific discretion. In this paper, we focus on the transformation of socio-material settings into objects of policy discretion. This move calls for manipulation—ontological work—enabling settings to be connected to policy aspirations. The settings become configured in terms of their professed policy-relevant dimensions. The outcomes affect how environmental liabilities become defined in policy processes. The paper develops a conceptual toolkit to analyse ontological work as it is performed by policy documents. We use the toolkit to analyse three types of policy documents defining how agricultural nutrient loading is to be reduced in the Finnish region of North Savo. The findings show that regulatory decisions and policy recommendations are, to a significant extent, outcomes of ontological work. Environmental liabilities are shaped by the ways ‘unstable junctures’ are brought into being. By these junctures we refer to the points in the configured policy landscapes where choices influential for water protection are, according to the documents, to be made. The documents also generate exclusions that narrow down what liability implies in the unstable junctures. Without a focus on the ontological work and emerging ordering effects, it would have been difficult to show how environmental liabilities became (un)defined in the policy documents. The approach is needed to understand how power is practiced in policy processes and how policy instruments come to have consequences.



A practice perspective on texts

- Policy documents put governmental intentions into circulation
- In open ended policy processes, documents also tell how regions transform into policy settings
- “Words do things... texts are active elements that contribute to shape the objects and issues in question” (Asdal and Reinertsen 2022: 213)



The research problem

- How North Savo, as a region in need of agricultural nutrient load reduction, becomes configured in three different types of policy documents
 - 15 Environmental permits of animal farms
 - 2 Regional Programme of Measures (POM) operationalising the planning mandates of the EU Water Framework Directive
 - A transition arena report





Methodology (1)

- Documents grant visibility to various elements and interactions
- However, only a fraction of these elements matter for definition of responsibilities
- Document analysis → how does this distillation occur?



Methodology (2)

- Identification of
 - **Legitimizing resources** that draw from the authority of law and science
 - e.g., scientific calculations and models
 - **Ordering concepts** that name, associate and classify
 - e.g., the concept of an environmental permit draws a relationship between an action and its conditions of regulatory acceptability
 - a measure (as in regional programmes of measures for water protection) points to a distinguishable operation



Findings: the environmental permits

- On what conditions can a permit be granted to an animal farm?
 - If there is enough field area for manure spreading
- Risk for nutrient loading, or the lack of it, is determined by the animal-field ratio
- Rules for the calculation: a legitimating resource; a soft law guide
 - “For the animal count presented in the application, a minimum of 156 hectares of field area must be available for manure spreading”
(Permit decision for a cattle farm, 2017)
 - All fields are treated as equal



The programmes of measures

- Due to the used modelling tool, farming became analysed as a single entity, a sector;
- Within the sector, responsibilities become located on farms (nothing new here!)
- Responsibilities defined in terms of voluntary commitments for which the farmers are compensated
- Is there money for the compensations?
- Not necessarily: the take-up of the agricultural measures was behind schedule: money had run out
- Liability over money: Brussels and Helsinki
- No new environmental responsibilities
- No specifically regional responsibilities



North Savo Transition Arena for a Blue Bioeconomy



- 6 workshops
- 14 participants

Nutrient recycling pathway

Transition steps include

- i) a subsidy scheme for the deployment of advanced manure processing technology
- ii) investments in centralised manure processing plants
- iii) creation of steady demand for biogas as a transport fuel (city of Kuopio public transport)
- iv) support for the productification of advanced organic fertiliser products



Conclusions

- The document analysis suggests that the governmental intentions related to abatement of agricultural nutrient loading become neutralised when encountering North Savo
- A welcomed outcome by some groups and actors; or even the only accepted outcome?
- The outcome is not based on publicly deliberated decisions
- Document analysis serves unravelling of “decision-making”
- Studying how regions become connected to policy aspirations is critical when the aim is to better understand how policies come (not) to have consequences

Thank-you!



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