Facing the water framework directive challenges: A baseline of stakeholder participation in the European Union

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A B S T R A C T

Public participation is a key element of Integrated Water Resources Management and, in the European Union (EU), is a major challenge in the implementation of the Water Framework Directive (WFD), which was adopted in December 2000. When new legislation enters into force it is essential to set a baseline against which to measure the progress towards the established goals at significant milestones of its implementation. This paper presents an assessment of the quality of stakeholder participation at the beginning of the WFD implementation in twenty countries belonging to or with close institutional relationships with the EU. The evaluation was completed by environmental non-governmental organi-zations and it shows that already in 2003 there were positive examples of stakeholder participation in several countries but that, in general, the WFD implementation will require significant efforts to improve on participatory practices throughout Europe.

Keywords: Stakeholders, Participation, Water Framework Directive IWRM, Evaluation Indicator

1. Introduction

The European Union (EU) Water Framework Directive (WFD), which entered into force in December 2000, introduces key elements intending to shift the EU water governance towards the application of Integrated Water Resources Management (IWRM) principles (Rault and Jeffrey, 2008). This implies the consideration of economic, environmental and ethical issues in water management at river basin level (EC, 2000; CIS, 2003). In terms of ethical considerations, the WFD requires Member States to base their actions on public participation (including public information, consultation and active involvement), the precautionary principle, the principle of subsidiarity, and the principle of transparency (Rault and Jeffrey, 2008). Among these principles, public participation (PP) stands out as key to ensure the success of the WFD: "The success of this Directive relies on close cooperation and coherent action at [European] Community, Member State and local level as well as on information, consultation and involvement of the public, including users." (Preamble 14, EC, 2000).

The assessment of the progress towards the achievement of set management goals "is a crucial part of laying the foundation for better decision-making on an ongoing basis and creating a strategy that can adapt to changing needs and conditions" (GWP, No Date, p.1). Periodical progress assessment helps to understand whether current efforts are enough to reach the established goals in a timely manner or if the applied arrangements need to be improved. Moreover, when a new legislation enters into force it is essential to have a baseline, to monitor whether current practices are changing in the direction expected by legislators and decision makers (EEA, 2000).

In the EU context, Member States were required to transpose the WFD provisions into their national legislation by the end of 2003, when the first planning cycle started. Member States are expected to approve new River District Management Plans compliant with the WFD by the end of 2009 and the results of the first planning cycle should be visible by December 2015. Having these deadlines in mind, a snapshot of stakeholder participation arrangements in water management at the beginning of the first planning period provides a baseline against which to measure the progress of Member States towards the WFD requirements in terms of stakeholder participation.

Despite the crucial role attributed to PP in the success of the WFD (CIS, 2003; Antunes et al., 2009; Mouratiadou and Moran, 2007; Rault and Jeffrey, 2008) and the broad literature discussing the theory of participation components (e.g. Mostert, 2003; Rowe and Frewer, 2005; Özerol and Newig, 2008; Pahl-Wostl, 2002; Hare et al., 2003; Gooch and Huitema, 2008), there are

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very few studies that assess and compare the quality of participatory processes in water-related decisions in EU countries. So far, cross-country and nationwide comparison evaluation initiatives have been carried out mainly by environmental non-governmental organizations (NGOs) (De Stefano, 2003; De Stefano and Schmidt, 2004; WWF/EEB, 2005; EEB, 2004). These analyze and compare the quality of participation in the WFD implementation process in a number of countries and in the Pilot River Basins of the Common Implementation Strategy (CIS), and assess the quality of the transposition of the WFD PP provisions into national laws. These assessments focus on the WFD process itself, and not on ongoing water resources management actions such as the approval of water-related projects or policies. This approach is sought by Videira et al. (2006), who critically reviewed the evaluation processes of specific water-related projects in five European countries with respect to participatory criteria (see also Antunes et al., 2009). Public participation is also analyzed in specific contexts from the perspective of social learning in 10 European River Basins (Mostert et al., 2007). The analysis of specific projects or contexts gives a valuable insight into the quality of PP in Europe. Nevertheless, these studies have some limitations in terms of providing a pan-European baseline for PP:

a) Their specificity limits the comparability of their results with future assessments;
b) They do not assess PP at a country level, and this constrains their capability to track the country evolution with time; and
c) They do not provide explicit country comparisons, which are powerful means for identifying positive supranational trends, the need for concerted actions at an international level, or shortcomings in existing supranational initiatives.

Some initiatives in the EU context consider participation from a theoretical standpoint or using specific case studies to assess how the WFD provisions could contribute to increase it (e.g. Rault and Jeffrey, 2008; Hedelin, 2008; Blackstock et al., 2007). Others look at how different participatory methods or approaches can help to facilitate participatory processes in the WFD context (Blackstock and Richards, 2007; Antunes et al., 2009; Mouratiadou and Moran, 2007; Kallis et al., 2006). Even if these studies offer an interesting insight into possible ways to improve participation in light of the WFD, they do not provide information on the starting point of the Directive implementation.

This paper revisits an assessment of stakeholder participation that was undertaken in 2002–2003, at the beginning of the WFD implementation process. The study focused on stakeholder participation at a country level and aimed at providing the needed baseline for stakeholder participation arrangements in water resources management in 20 countries belonging to or with close institutional relationships with the EU. The author carried out the evaluation on behalf of the European network of the World Wide Fund Nature (WWF), as a component of the so-called WWF Water and Wetland Index. The results presented in this paper reflect the situation at the end of 2003 from the perspective of European environmental NGOs. They can be seen as a baseline against which to evaluate the situation in 2015, in order to understand how significant the impact of the WFD has been on stakeholder participation in water management.

Section 2 of this paper presents the assessment methodology, outlining the objective and scope of the analysis, the evaluation criteria applied and the procedures used to gather and process data. Section 3 describes the results of the assessment, and is followed by a discussion of the caveats associated to the evaluation (Section 4) and the conclusions (Section 5).

2. Methodology

2.1. Scope of the assessment

The first step in the design of an assessment methodology is the clear definition of the objective and the scope of the analysis (Winograd et al., 1999). Our objective was to give a snapshot of stakeholder participation in water management processes in European countries. To achieve this objective, our indicators had to address the water-related decision-making processes[1] developing *in parallel* to the WFD implementation and not *within* the WFD process itself. Indeed, in 2002–2003 the WFD planning process had not yet started and the practices used at that time for the approval of water projects and plans constitute the actual reference for measuring the impact on participation of this Directive.

There are many definitions of PP, e.g. “the expectation that citizens have a voice in policy choices” (Bishop and Davis, 2002, p. 1); “ a categorical term for citizen power” (Arnstein, 1969, p. 217); a “process where individuals, groups and organizations choose to take an active role in making decisions that affected them” (Reed, 2008, p. 2418); “any of several mechanisms intentionally instituted to involve the lay public or their representatives in administrative decision-making” (Beierle and Cayford, 2002). In this paper we define PP as “allowing people to influence the outcome of plans and working processes” (CIS, 2003, p. 12) and distinguish three levels of participation, implying increasing engagement: information supply, consultation, and active involvement. Information supply refers to providing public access to information on decision-making processes related to freshwater management. Consultation means providing the public and the interested parties with the opportunity to react to plans and proposals developed by the authorities, while active involvement refers to stakeholders actively participating in the decision-making process (CIS, 2003). In this paper, the analysis is focused on organized stakeholders and does not attempt to evaluate the engagement of the wider public.

Many authors highlight the benefits of participation on the quality of water governance (Mostert, 2003; Blackstock and Richards, 2007; Delli Priscoli, 2004; Reed, 2008; Richards et al., 2004; Pahl-Wostl, 2002; Özerol and Newig, 2008) but few have actually proved that PP as such helps to reach better decisions (Reed, 2008). However, scholars and practitioners seem to agree that the quality of the participatory process strongly influences the quality of the attained decision (Reed, 2008; Beierle and Cayford, 2002). Our evaluation starts from this assumption and focuses on the quality of the participatory process and not on the quality of the decisions themselves.

Our methodology was shaped so as to obtain a “utilization-focused evaluation” (Patton, 1997), meaning that the methodological approach stems from the identification of the possible audience of the evaluation results, and their primary users and uses. Patton (1997) explains that, in order to avoid that results of the evaluation remain unused, its focus has to be the result of a “negotiation” between the designers and the users. The author of the present paper identified as primary users a network of European environmental NGOs and EU institutions in charge of monitoring the implementation of EU water legislation. As such, staff belonging to the European WWF team, the European Environment Agency, the European Commission, and several national water experts were consulted while designing the evaluation.

[1] By water-related decision-making processes we mean the design and approval of water-related laws, strategic planning, policies and programmes, as well as the planning of specific projects such as the construction of water infrastructure.

2.2. Evaluation criteria

The definition of evaluation criteria is a fundamental prerequisite in the definition of evaluation frameworks (Blackstock et al., 2007). In the case of participation, the task is complicated by the absence of a consensus on what constitutes best practice in stakeholder participation (Rault and Jeffrey, 2008; Mostert, 2003; Rowe and Frewer, 2000; Webler et al., 2001; Webler and Tuler, 2006). A direct consequence of this is the absence of either "off-the-shelf" solutions or "blueprint" for PP, even under the specific legal umbrella of the WFD (Rault and Jeffrey, 2008). Hence, scientific papers and participation guidebooks often focus on key elements of the participatory process and recommend tailoring existing methods and tools to the specific context (e.g. von Korff, 2007; Kampa et al., 2009; CIS, 2003; Reed, 2008; Tippett et al., 2005; Özerol and Newig, 2008).

Combing the scientific literature, Reed (2008) identifies eight key good-practice elements of stakeholder participation that seem to gather broad consensus among scholars. Criteria for the evaluation of stakeholder participation can be deduced also from research fields closely related to stakeholder participation. For example, Tippett et al. (2005) highlight that social learning and effective active involvement have a "cyclical relationship" and that social learning is an "essential outcome of participatory processes" that are successful on the long run. Therefore, the five key provisions to achieve social learning identified by Tippett et al. (2005) are also relevant process criteria to assess stakeholder active involvement. Similarly, Blackstock et al. (2007) list evaluation criteria for participatory research cited in the literature on the subject. Rowe and Frewer (2000) identify nine criteria to evaluate both the participatory process and its acceptance by the broad public. Hedelin (2007) uses a deductive approach to define elements to look at integration and participation from a theoretical standpoint.

In our study, we chose to focus on criteria that define the quality of the participation process (*procedure criteria*) and to include also a component reflecting the perception of the quality of that procedure (*perception criteria*). Indeed, as emphasized by Rowe and Frewer (2000), if a procedure is effectively constituted but is perceived as unfair or inadequate by the participants, these may be reluctant to engage in it or to accept its result. On the other hand, decisions made through poorly designed procedures can prove to be inadequate even if the participants involved in the process seem to find its results satisfactory.

The starting point for the definition of our evaluation criteria was the Public Participation Guidance Document n. 8 of the WFD Common Implementation Strategy (CIS, 2003). The decision of adopting the best practice guidelines defined in that document is based on the following considerations:

a) The CIS Guidance Document was elaborated to help clarifying the basic PP principles and practices for WFD implementation. Hence, its guidelines are adapted to the EU context and are specifically tailored to the requirements of the Directive.
b) Their official endorsement by the EU Water Directors makes the CIS guidelines very relevant for water practitioners: in the words of Rault and Jeffrey (2008, p. 245) "the Common Implementation Strategy is the closest document to a guideline that is available to competent authorities" within the EU.
c) The CIS guidelines are the result of an intense work of water experts from governmental and non-governmental organizations in the EU, hence drawing from diverse expertise and subject to scrutiny from different points of view. Therefore, they present from a practical standpoint several ideas and principles that can be found in the scientific literature on the subject.

The analysis of the CIS Document and the interaction with our evaluation users led to the selection of the procedure and perception criteria summarized in Table 1:

2.2.1. Scope of the process

Water management on the ground is the final result of several processes that define policy goals and the specific instruments to implement them. Hence, transparency and participation should be present, even if with different intensities and modalities, in each step (legislative initiatives, strategies, plans) leading to the definition of specific projects.

2.2.2. Scope of the participants

The selection of who should be engaged is based on their stake in the decisions resulting from the participatory process (Grant and

Table 1
Procedure and perception criteria that were assessed for each participation level: Proactive Information (PI), Consultation (C), Active Involvement (AI).

Procedure criteria	*PI*	*C*	*AI*
Scope of the Process			
• Participatory processes should address the elaboration of laws, plans/strategy and specific water-related projects	•	•	•
Scope of the Participants			
• Participatory processes should include at least representatives of the following stakeholder groups: industry (including energy production), urban supply, agriculture (including animal breeding), green NGOs, academic sector	•	•	•
Process design			
• Consultation objective is stated at the outset		•	
• Target audience is stated at the outset		•	
• Consultation documents include a timetable for the consultation process		•	
• Responses from consultees and the outcome of the consultation exercise are published before any subsequent change in the relevant policy, law, program		•	
Capacity building			
• The Authorities ensure access to background documents related to the different water management components	•		
• Documents are provided insufficient time to allow consultees to provide considered responses		•	
• Financial support is provided for stakeholders to be actively involved			•
Perception criterion	***PI***	***C***	***AI***
Level of empowerment			
• Information language and form are suitable to the recipients	•		
• Information is complete and timely provided	•		
• Stakeholders have a real chance of influencing the process with their comments		•	
• Stakeholders have a real chance of influencing the process with their involvement			•

Curtis, 2004; CIS, 2003). Many authors suggest that a stakeholder analysis is essential to identify which specific stakeholders should participate (CIS, 2003; Özerol and Newig, 2008; Reed, 2008; Mostert, 2003). In our evaluation we focus on the stakeholder typology defined as "professionals" by the CIS Document (CIS, 2003, p.16), and we assume that participatory processes should include *at least* representatives of the following stakeholder groups: industry and power production, urban supply, agriculture and animal breeding, environmental NGOs, and academic sector.

2.2.3. Process design

A clear definition of the participation task is essential to manage participants' expectations and to prevent the occurrence of misunderstandings or disputes about the process itself (Richards et al., 2004; CIS, 2003; Reed, 2008; Mostert, 2003). Hence, the objective of the consultation, its target audience, and timetable should be clearly defined at the outset (Rowe and Frewer, 2000; Reed, 2008). Transparency should also be ensured in the process itself (Rowe and Frewer, 2000; Webler et al., 2001; Blackstock et al., 2007), for example through an adequate management of the comments received during consultation.

2.2.4. Capacity building

Effective decision-making requires access to relevant and appropriate information and also capacity to react to the provided information (CIS, 2003; Rowe and Frewer, 2000; Blackstock et al., 2007; Özerol and Newig, 2008). Therefore participants need to have adequate human and financial resources (Rowe and Frewer, 2000; Richards et al., 2004; Tippett et al., 2005), which can be fostered with training and financial support (Özerol and Newig, 2008; Mostert, 2003). At the same time, participants have to be granted sufficient time to provide considered contributions to the document submitted to consultation (Tippett et al., 2005).

2.2.5. Level of empowerment

Any participatory process should be underpinned by a philosophy of empowerment and trust (Reed, 2008). Stakeholders need to perceive that their voice can be heard and that they can have a real chance to influence the final decisions (Reed, 2008; Tippett et al., 2005, 2007; Chase et al., 2004; Rowe and Frewer, 2000; Grant and Curtis, 2004; Blackstock et al., 2007). This requires an early involvement in the process, to avoid that the participatory process starts when decisions have already been taken (Hedelin, 2007; CIS, 2003; Özerol and Newig, 2008; Reed, 2008; Mostert, 2003; Tippett et al., 2005). Moreover, all the relevant information should be provided timely and be expressed in a way that is accessible to the recipients (CIS, 2003; Tippett et al., 2005; Reed, 2008).

The evaluation criteria were shaped into a questionnaire organized according to the three levels of participation defined in the WFD. All the criteria were assessed for each of the three participatory levels, except for the Process Design criterion, which was considered for consultation only (Table 1). Questions related to the two types of evaluation criteria (*procedure* and *perception*) were kept separated in the questionnaire. All the questions were close-ended and the evaluators were asked also to explain and document their answers.

2.3. Data gathering and processing

The decision of who should be in charge of undertaking the assessment has significant consequences on several aspects of the evaluation exercise (Kaufmann and Kraay, 2008). At one extreme of the spectrum, an assessment can be carried out entirely by governmental officers who are directly responsible for the issue being reviewed. At the other extreme, the evaluation may be conducted entirely by people external to the water management sector (Hockings, 2000). Assessments can be completed by governmental officials, by external consultants, by specific stakeholders, or by using a combination of approaches. In some cases they can be derived from broad surveys of individuals and firms (Kaufmann and Kraay, 2008). There are advantages and disadvantages in each of these approaches and an exhaustive discussion on this point can be found in Hockings (2000).

Our assessment required the support of evaluators having a good knowledge of and direct involvement in national water policy in as many European countries as possible. Typically, transnational assessments are carried out by international governmental organizations, which process information provided by its Member States or signatories. For our study, the option of involving governmental officials was immediately ruled out due to lack of official governmental commitment to participate in the assessment. The use of exclusively independent consultants was also ruled out due to resource constraints. As a result, we opted to focus our study on the environmental NGO sector and asked water policy officers of the European WWF network[2] (hereafter 'evaluators') to be directly involved in the data gathering.

The questionnaire was completed in the following countries: Austria, Belgium, Bulgaria, Croatia, Estonia, Finland, France, Greece, Hungary, Ireland, Italy, Latvia, Poland, Portugal, Slovakia, Spain, Sweden, Switzerland, Turkey and the United Kingdom[3]. Due to their specific legal autonomy, in Belgium the assessment was done separately for the Flemish and Walloon regions; in the United Kingdom for England/Wales, Scotland and Northern Ireland. In total there were 23 countries/regions surveyed. The evaluators were all actively involved in national water policy and were familiar with water-related participatory processes in their countries. Moreover, they need to be able to locate, access and consult water-related policy documents and laws, and to connect with other water stakeholders. They were given a guidebook explaining the assessment objectives and methodology and most of them attended a specific seminar prior to data gathering to discuss the questionnaire and address any concerns.

At the beginning of the assessment, the evaluators were requested to interview or consult in writing with other governmental and non-governmental water stakeholders regarding the evaluation content. The objective of these interactions was for the evaluators to broaden their knowledge of participatory processes and to better understand the perspective of other stakeholders on the quality of the participatory processes. The interviewees were individuals belonging to the water sector (water companies, NGOs, governments, executive agencies, local and regional authorities and research institutes) who were involved in the national water policy of their country. In the process, more than 270 individual stakeholders were consulted in the 23 countries/regions covered in the study. The number of stakeholders for each sector and country varied depending on the resources available to the evaluator within each country. The evaluators used the questionnaire to guide the informative interviews, but actually completed the evaluation at the end of the interviews cycle and one set of answers was obtained for each of the studied countries. Questions were closed-ended and were assigned numerical values (e.g. 0–4). For each question, the evaluators had a comments section where they were asked to

[2] In Slovakia the evaluation was undertaken by a senior consultant.

[3] Turkey and Croatia were included for being in the process of negotiating their accession to the EU. Even if Switzerland has no legal obligation to comply with the WFD, it follows the implementation process very closely, as shown by its involvement in the WFD Common Implementation Strategy Initiative.

explain and justify their answer selection. In the data processing, the answers to the closed-ended questions were used to get a global comparative picture of the situation while the comments were used to give more nuanced explanation of the countries performance. A similar approach is behind several cross-country assessments of water resources management (De Stefano, 2010): the UNEP the United Nations Department of Economic and Social Affairs (UNDESA) questionnaire (UNDESA, 2007); the United Nations Environmental Program (UNEP)/DHI survey (UNEP/DHI, 2007), the African Development Bank (AfDB) questionnaire (AfDB, 2007), and the Global Water Partnership Stakeholder Surveys (GWP, 2004', 2006).

The questionnaire answers were processed using formula (1) to obtain a single score for each participatory level and country.

$$E_{c,Xi} = \frac{(Proc_{c,Xi} + Proc_{c,Xi} \times Perc_{c,Xi} + Perc_{c,Xi})}{3} \times 100 \qquad (1)$$

where $E_{c,Xi}$ is the score of country c for each of the three participatory levels Xi (i = 1,2,3), expressed as percentage of the maximum possible score. $Proc_{c,Xi}$ is the average of the scores for the *Procedure Criteria* in country c and level Xi, normalized to 1. $Perc_{c,Xi}$ is the *Perception* score given by the evaluators for country c and level Xi, normalized to 1.

This formula aims at balancing the value of procedure-based and perception-based answers, to avoid that the overall country score rewards very complete process provisions that are perceived as deeply inadequate, or excessively positive or negative perceptions that are not supported by evidence in formal participatory mechanisms. Indeed, if, for a certain country and participation level, the values of Procedure and Perception are very different (Proc >> Perc or Proc << Perc), the weight of two of the three addends of formula (1) will be reduced. Conversely, countries having coherent Procedure and Perception answers (Proc ≈ Perc) will get a global evaluation score E that is slightly higher than those where there is a clear discrepancy. For example, if a country has Procedure equal to 0.3 and Perception also equal to 0.3, the numerator of formula (1) will be equal to 0.69 (0.7); at the same time, if another country obtains Procedure equal to 0.6 and Perception equal to 0, the numerator will be equal to 0.6.

3. Results[4]

The weighted combination of the assessment of procedure criteria and perceptions allowed us to rank countries according to the quality of the three participation levels (Figs. 1–3). In order to facilitate the interpretation of results, countries were further grouped into five classes (very poor, poor, moderate, good, very good) reflecting the level of compliance with the principles used as a reference in the assessment. While the ranking is the direct result of the homogeneous processing of the country scorings, this splitting into five categories is an additional interpretative tool, aimed at highlighting trends and similarities in the countries' performance.

The scorings in Fig. 1 suggest that the quality of proactive information related to water management is quite heterogeneous throughout Europe, as the studied countries are evenly distributed along the spectrum of compliance with our evaluation criteria. However, countries with moderate to very poor compliance outweigh those with good or very good compliance levels, indicating the general need to boost proactive information.

Fig. 2 suggests that the provisions to ensure public consultation reach good levels of compliance with our criteria in the majority of the studied countries. This could be partially explained by the fact that the consultation obligations related to the Environmental Impact Assessment and the Strategic Environmental Assessment Directives (EEC, 1985; EC, 2001) have already created an institutionalized platform for consultation. In terms of geographical trends, there seem to be a clear division between Northern and Central European countries with high levels of compliance, and Eastern and Southern countries showing deficiencies in consultation practices.

Fig. 3 seems to indicate that the quality of stakeholder involvement in decision-making processes needs to be improved in the majority of the studied countries. None of the countries were classified as having "very good" active involvement and one-third of the studied countries presented very low values of compliance with the evaluation criteria. This result should not be surprising, as active involvement is undoubtedly the most challenging of the three participation levels mentioned in the WFD. In contrast with the other two levels of PP, no Directive explicitly requires active involvement as a routine practice. Even the WFD requires to 'ensure' information and consultation but prescribes to *only* 'encourage' active involvement.

While Figs. 1–3 give an overview of the countries' compliance with the evaluation criteria, the impediments to PP that were identified during the assessment are described in the following pages and summarized in Table 2.

The analysis of the questionnaire responses revealed the need for improvement in the participation processes even in countries where the overall assessment results were quite positive. For instance, in countries such as Ireland, Northern Ireland and Scotland, a number of arrangements already ensured formal stakeholder participation, but the existing participatory instruments were perceived to be inadequate.

Another detected feature was that, in general, the "digestibility" of the information provided should be improved. Indeed sometimes information was too technical to be understood by some of the interested parties (Bulgaria, England/Wales), or the material

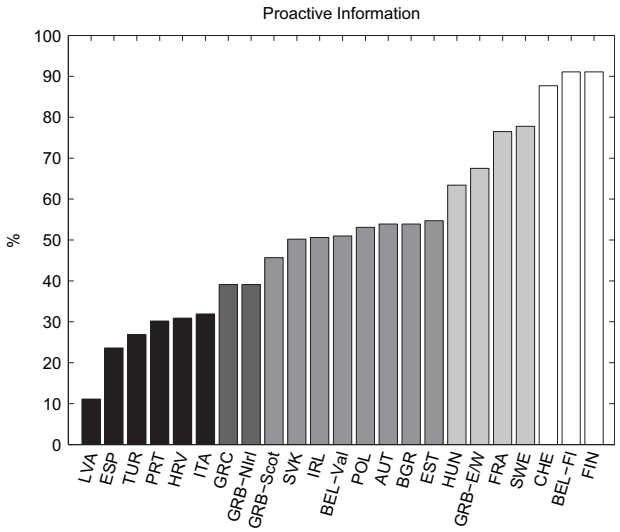

Fig. 1. Country scoring for proactive information, expressed as a percentage of the maximum possible score. Grey intensities show the level of compliance with the evaluation criteria. "Very good" (white), "good" (light grey), "moderate" (grey), "poor" (dark grey), and "very poor" (black). The ISO ALPHA-3 code was used as country abbreviation.

[4] This section draws from De Stefano and Paschen (2003).

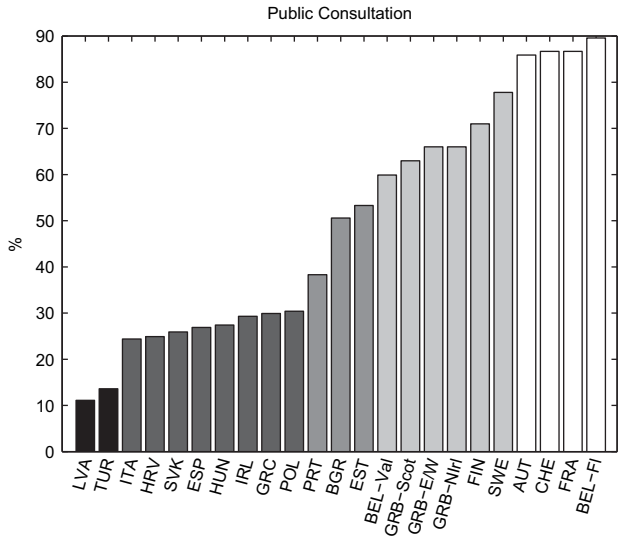

Fig. 2. Country scoring for public consultation, expressed as a percentage of the maximum possible score. Grey intensities show the level of compliance with the evaluation criteria. "Very good" (white), "good" (light grey), "moderate" (grey), "poor" (dark grey), and "very poor" (black). The ISO ALPHA-3 code was used as country abbreviation.

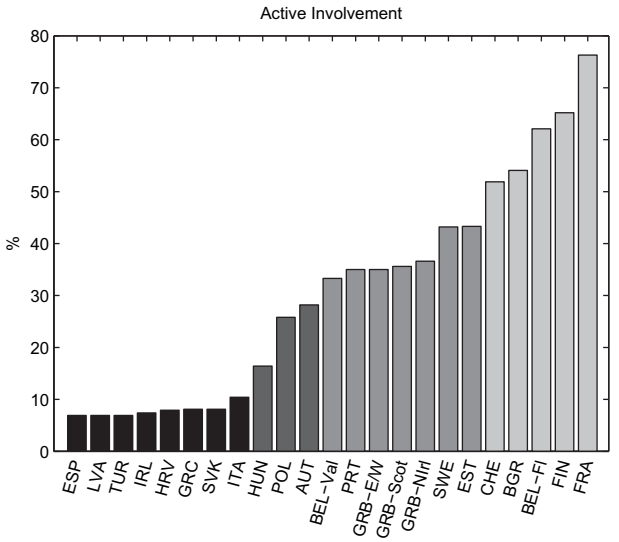

Fig. 3. Country scoring for active involvement, expressed as a percentage of the maximum possible score. Grey intensities show the level of compliance with the evaluation criteria. "Very good" (white), "good" (light grey), "moderate" (grey), "poor" (dark grey), and "very poor" (black). The ISO ALPHA-3 code was used as country abbreviation.

made available was so bulky or unorganized that it often discouraged continued involvement and consultation on the part of stakeholders (Flanders, Ireland, Scotland).

Also, easy access to background documents[5] seemed to require improvements. Indeed, such documents were available in most cases, but, in some of the surveyed countries (Bulgaria, Greece, Portugal, Spain) their access was very time-consuming and hampered by bureaucratic procedures, to the extent that it discouraged the interested parties from filing access requests.

The analysis found that the definition and approval of specific projects such as construction of water infrastructure were the less transparent decision-making processes in water management. Indeed, formal arrangements for proactive information about specific projects reached a sufficient level of adequacy in less than 40% of the countries, while information procedures for legislation and strategies/programs were formally sufficient in 69% and 60% of the countries, respectively.

In 60% of the surveyed countries, when documents were submitted to public consultation, responses were published only in isolated cases before any subsequent change in the legislation, strategy or project took place. This made the involved stakeholders less confident of the effectiveness of their participation in the process. The publication of the consultation outcomes was found to be normal practice in Flanders, Estonia, France, Ireland, Sweden, Switzerland and UK.

In all the countries examined, the evaluators pointed out the need for earlier involvement in water management processes. Indeed, often documents were issued for consultation only at the end of the decision-making process (Austria, Greece, Latvia, Portugal, Slovakia, Spain, England/Wales) and this made it very difficult to truly participate and influence the process. Moreover, in several countries (Austria, Greece, Hungary, Italy, Portugal, and Spain) the voluntary consultation on draft documents was often found to be irregular.

The study showed that the participation of environmental NGOs or academic sectors was sought less proactively than that of economic sectors (industry, water supply and agriculture). Indeed, while economic sectors were informed mainly for lobbying reasons or because they are closely linked to the Public Administration, in several countries (Austria, Croatia, Slovakia, Spain, Poland, Portugal) so-perceived 'conflictive' sectors like environmental NGOs were generally informed only following strictly legal obligations. This trend was even more evident in arrangements for formal active involvement of non-governmental water stakeholders, which existed in less than 50% of the surveyed countries only.

The study showed that a major impediment for effective stakeholder participation was the limited capacity of the participants. Indeed, arrangements for participation tend to be less than helpful when the interested parties lack either specialist knowledge or human capacity to get truly involved in decision-making (Reed, 2008). For instance, in several countries (Croatia, Finland, France, Greece, Ireland, Switzerland, Northern Ireland, Scotland) the analysis found that environmental NGOs were often overwhelmed by the work related to consultation processes. Due to their limited financial and human resources, they were obliged to prioritize which processes they could participate in, and could not always ensure continuity in the chosen process.

In less than 60% of the surveyed countries there was some type of financial support for non-governmental stakeholders attending participatory events related to freshwater management. Furthermore, this was not the general rule and applied to travel expenses only, while work effort was not paid. A positive exception to this rule was found in Flanders and, in isolated cases, England/Wales.

4. Discussion

The results presented in the previous section have the value of giving an overview of and comparing participation practices in a high number of European countries during a specific timeframe. However, as in any analysis with a broad geographical scope, their interpretation requires several caveats.

[5] E.g. Scientific/technical reports, notes of meetings, draft plans/strategies.

Table 2
Impediments to stakeholder participation that were identified through the evaluation (based on De Stefano and Paschen, 2003).

PP Level	Problems encountered
Proactive information	• The participation of economic sectors (industry, water supply and agriculture) is sought more proactively than that of environmental NGOs or academic sectors • Bureaucracy or administrative obstacles make the access to background documents difficult and time-consuming • Information is too technical, bulky or unorganized so that it discourages involvement and consultation
Public consultation	• Documents are issued for consultation only at the end of the decision-making process • Non-compulsory consultation on drafts is often irregular • Responses from consultees and the outcome of the consultation exercises are published only in isolated cases, if ever • Lack of transparency makes stakeholders less confident of the effectiveness of their participation
Active involvement	• Decision-making processes about specific water projects are the less transparent ones • The participation of economic sectors (industry, water supply and agriculture) is sought more proactively than that of environmental NGOs or academic sectors • Few financial support for non-governmental stakeholders attending participatory events, mainly limited to reimbursement of travel expenses • Lack of capacity for continued active involvement on the part of stakeholders

First of all, the assessment presents the perspective of a specific stakeholder sector. The reasons for this choice have been explained in Section 2.3 of this paper and are undoubtedly related to the significant resources that are needed for any cross-national study. Getting the perspective of a specific sector has the value of providing an alternative point of view on the subject (UN-Water, 2008). There is no doubt that the results should be read taking into account that the data were gathered by environmental NGOs. However, we believe that the clear distinction between procedure criteria and perception, and the obligation for the evaluators to interview other stakeholders, enabled us to capture the main 'facts' about participation, independently from the specific NGO perspective. In the future, having resources available, it would be interesting to extend this evaluation to other water stakeholders and directly capture their perspectives.

A second caveat required for this type of comparative studies is the scope of the analysis. Indeed, in order to compare country performances, the evaluation needed to address participatory processes in a generic way, i.e. without focusing on a specific set of processes, as it is done for example in Videira et al. (2006) and Mostert et al. (2007). Hence, the results described in this paper should be taken only as an indicator of trends within each country and within the EU, acknowledging that there may be positive or negative exceptions to the tendencies described here.

A third caveat is related to the depth of the analysis. The historical, political and socioeconomic contexts of the assessed countries are very diverse and undoubtedly have an impact both on the quality of the participatory provisions and on the perception of their adequacy. Our assessment acknowledges these differences by allowing local evaluators to express their perception of participation in their country context. Analyzing the results within their national contexts seems more appropriate for specific case studies (e.g. Blackstock and Richards, 2007), and was out of the scope of this work.

In terms of improvements, in the future it would be very interesting to increase the number of the considered procedure criteria. For example, it would be useful to include the analysis of relevant stakeholders (CIS, 2003; Reed, 2008), the assessment by the authorities of the specific participatory processes (CIS, 2003; Blackstock and Richards, 2007), and the availability of highly skilled facilitation (Reed, 2008). On the other hand, the evaluation of the stakeholder perception would benefit from the definition of additional criteria, for example those related to the capability of the participation organizers to maintain interest and build trust (Tippett et al., 2005), and to the management of power inequalities (Reed, 2008; Hedelin, 2007). Another interesting aspect to be further investigated is how to reflect the multi-level dimension of water governance in the assessment methodology.

5. Conclusion

This study aimed at giving a snapshot of stakeholder participation at the beginning of the WFD implementation process. The resulting picture is a combination of the analysis of participatory provisions and the perception of their quality from the perspective of a group of environmental NGOs.

Our assessment revealed that, at the beginning of the WFD implementation process, PP in water management was poor or very poor in almost half of the studied countries, especially in Southern and Eastern Europe. The most critical aspects of PP were found to be the lack of proactive information provided to non-governmental stakeholders and the poor quality of active involvement of interested parties in decision-making processes.

From these results, it can be concluded that, in order to fulfill the requirements of the Water Framework Directive, the Aarhus Convention (UN-ECE, 1998) and the Public Access to Information Directive (EC, 2003), EU governments and water management authorities should increase the quality and quantity of opportunities for non-governmental stakeholders to be informed and consulted.

If the WFD obligations are correctly transposed into the national legislation, they should tackle some of the problems identified by our assessment, e.g. those related to the need for a clear consultation timetable. However, the results presented in this paper show that even the strict implementation of the WFD requirements might be insufficient to achieve good levels of stakeholder participation. Indeed, our study found that it is necessary to work on building the capacity of water stakeholders, through timely and effective provision of adequate information, as well as training and financial support for their active participation in decision-making processes. Moreover, a more open discussion of interim drafts of specific projects and legislation texts, as well as more transparent consultation processes, though not explicitly required by the WFD, are needed to foster confidence in the usefulness of existing participation provisions.

In the future it is necessary to keep monitoring the evolution of participation practices. The results of our study suggest the interest of assessing not only the existence of participatory provisions but also their actual capacity to effectively engage stakeholders with decisions. Moreover, the evaluation should not be limited to the planning process but encompass also the drafting and approval of legislation and strategies that influence the content of plans and projects. In this context, the replication of this assessment exercise in 2015, at the end of the first WFD planning cycle, may help to measure the contribution of this Directive to the achievement of a more transparent and participatory way of managing water in Europe.

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