

**An Institutional Analysis of Voluntary Regulation: examining  
resource efficiency initiatives 1997-2001**

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**submitted for the degree of Doctor of Philosophy  
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AN INSTITUTIONAL ANALYSIS OF VOLUNTARY REGULATION: examining  
lesser-known alternatives 1997-2001

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## Abstract

The potential global consequences of rates of resource consumption in modern economies have prompted several governments to use forms of voluntary regulation to promote improved resource efficiency within the firm.

The UK government outsourced a wide programme to encourage waste minimisation. Part of this promoted local 'waste minimisation clubs' (now called resource efficiency clubs) which worked with members to achieve simultaneous reductions in materials and energy use, and in costs. More than 80 were run. Typically, intermediaries (some from universities) helped establish local partnerships, grant funding was obtained, volunteer firms participated, and activity ceased when funding did. Some results were inspiring and cited in policy documents. Yet it was hard to recruit and few published reports.

This thesis focuses on the intermediaries. It examines their insecure and sometimes contentious positions, their claims-making and bricolage, and their abilities to shape communications about, and arrangements within, such best practice projects. Previously, intermediaries have been almost invisible participants in these temporary 'project worlds' where change is constantly recommended.

Using constructs from institutionalist theory to study activity relating to short-term initiatives is unusual and 'stretches' the theory to its very edges. Yet interorganizational projects are now common and reflect what W. W. Powell (2001:30) calls "a new logic of organizing," involving, in his terms, profoundly new and discontinuous approaches to mechanisms of governance, creating disturbances at the boundaries of organizations and to the status order of organizational fields. The final chapters suggest ways of conceptualising the intermediaries' roles within institutionalist theory and consider their significance in voluntary regulation. One suggestion likens them to commensals, operating between fields of formal organizations, proffering various fashionable services related to norms, translating ideas more or less well, and constituting a mere potentiality for change, whilst reinforcing certain expectations. The thesis ends with suggestions for further research.

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"Theory is always for someone..." (Cox,1980:128)

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*In memory of my Dad, J.H. Greenwell*

## Chapter 1. Introduction

Institutions are enduring operating structures based around roles and rules, voiced or unvoiced; much institutional writing explores the seeming paradox of changes to these slow, unseen “beasts”. Yet all around us are completely new systems of operation and organization of work - based on modes such as projects, use of outside consultants and specialist short-term teams from a range of organizations, working outside the normal hierarchical structures and arrangements - which are sweeping across industries and displaying to outside constituencies the applauded virtues of entrepreneurship, co-operative working and improved measurement of efficiency. In 2001 in a monograph, W. W. Powell used institutionalist ideas to discuss the new forms of work which focus on projects, where boundaries between organizations blur in ‘a forest of interorganizational relations’ and proceeded to ‘sketch the outlines of a new logic of organizing’ and to suggest a research agenda for analysing these emerging problems (2001:11 and abstract). These new working arrangements, which still affect only a minority of the workforce, are already impacting on the kinds of actions governments wish to set in train in regard to policy, (not least for their short-term nature and consequent relative cheapness). The people with roles under the new project arrangements may have them only temporarily, or may continue from one project to the next, each time working with new sets of partners from quite other organizations. The projects are operating rule systems of a sort, some rules for operation being adopted quickly, often to all intents unconsciously - and some disregarded; neither process is understood. Nor are these arrangements capable of being expressed easily within much of the range of institutionalist writing. Even where the organizations concerned, and their hierarchies, exhibit a certain ambivalence to these new arrangements, nevertheless, some individuals and work units who become involved gain, and are thriving; others do not.

Alongside these developments, and also of huge significance for those interested in the operation of rule systems, is the rise of so-called voluntary regulation - the increasing approval shown by governments to systems which rest on the known ability of organizations and groups to self-organize and self-regulate, in preference to using common, socially-prescribed rules laid down by legislatures. This is interesting as regards institutional theory where rules are often seen as central; it is doubly interesting when such preferred self-regulatory systems coincide with project work, in examples where government itself uses outsourced projects as a means to display its policy of preferencing new technologies and new practices by industry.

This thesis examines almost a classic example of this - a series of government backed projects to improve resource efficiency in industry - considering how they operated during the years 1997-2001, focusing on examples in the East of England and London. It considers the arrangements that

were made (or not made) for the projects in the organizations concerned, the way that rules were followed within them and their operation alongside previous organizational norms and understandings. It examines, from an institutional perspective, the way that prioritisation of these activities was played out against the norms and practices of professionals concerned, the norms and practices of the parent organizations (under which efficiency and targets were driven), the norms and established preferences of targeted industry groups, and the society-wide ethics of some of the participants.

The projects to be examined were deployed for good reasons - they comprised a significant part of the British state's response to evidence suggesting a looming global economic, social and ethical problem. Evidence from a number of sources indicates that the rates of usage of materials and energy being taken into modern economies are so vast that they may not be able to continue for many more decades and that the scale of the effluents produced - solid, liquid or gaseous - are causing harmful, and in some cases irreversible, changes, for example to climate (Ayres and Ayres 1998 and 1999, ENDS 1997:20-23, Financial Times 10.7.02 at page 11; Jacobs 1991, Matthews and Hammond 1999, Matthews et al. 2000, Redclift 1996, World Resources Institute 1997). It is claimed, quite contrary to any assumptions of continually increasing efficiency, that modern methods of production and distribution entail huge wastage of resources, yet the issues, technical, social, economic and political, arising from this claimed problem still run rather outside major modes of thinking and counter many assumptions of how it is best for economies to operate (Kapp 1976; Steppacher, Zogg-Walz and Hatzfeldt 1977). Improving efficiency in the use of substances, materials and energy is a concern which had been considered for many years as less important than ensuring efficiency in the usage of capital and labour (Bleischwitz, 2001). It has been common for those living in more economically advanced countries to disregard resource inefficiencies (sometimes termed resource productivity issues) yet, given current institutions, practices and values, they present some of the most difficult and intractable problems if such societies are to be sustainable in the long term (Kohn et al. 1999). Further, if acknowledged, they pose ethical problems in regard to inequality and cruelty inflicted on less affluent parts of the world and possibly on future generations. Governments around the world are attempting remedies or trialling responses yet because, as David Simpson points out, there has been an 'almost universal consensus that economies need to grow... in order to prosper' (cited in Masood and Garwin, 1998: 427), these responses have often taken the form of measures to improve resource efficiency within firms and they are being evaluated as they occur (OECD 1995a; 1997a). Different theories suggest different social and political responses; there is still a lack of clarity about the factors which are operative. Thus gaining more understanding in depth of how specific attempts to mitigate the problem worked, or did not work, as is attempted in this thesis, could be helpful practically; examining them theoretically could provide greater understanding of some of the presuppositions or mechanisms which may be blocking beneficial changes more widely. Whilst this is so, and these concerns formed the spur for the projects and for understanding them, and set the ethical basis for the actions of many of the actors and organizations described here, they are not pursued *in se* in

this thesis. Rather, the focus is on the social arrangements of these government-backed initiatives - particularly the operative rules and roles for the various intermediaries who worked on these short-term projects - and how they influenced their operation and the claims that were made about them.

This first chapter sets out a brief introduction to the projects, giving an overview of the theories and discourses behind them, and the social and political context to their being used, focusing on ideas of voluntarism. There is then a brief consideration of the place of this thesis alongside current research concerns before a statement of the research problem, the position which is to be argued and a review of the potential significance of the research findings. The terms waste minimisation and pollution prevention are then introduced. The penultimate section reviews the circumstances of the study and special factors which may be considered to have influenced how it was carried out, (the methods themselves and their potential delimitations are explained in Chapter 4). The final paragraph sets out the matters to be dealt with in the subsequent chapters.

### A brief overview of the projects

The initiatives to be examined here provided one of the main ways which the state, central and local, demonstrated its concern about resource inefficiencies in industry. The UK support was in line with OECD work which both investigated and promoted similar initiatives across several countries (e.g. OECD 1987; OECD 1992; OECD 1993). The aim in all cases was to ally concerns about waste and pollution to systems that were already encouraging productivity. Consumption was not targeted; nor were there explorations of the intimate links between production and the social practices constituting consumption (see Harvey, McMeekin et al. 2001) The initiatives were known originally as waste minimisation clubs, later the official term for them was changed to resource efficiency clubs. The official focus was on firms minimising, not merely diverting their effluents, by making changes which also reduced their operating costs. (see, for example, ETBPP 1996b, 1997a, 1997d, 1997e, 1998d, 1998f). In this, they had some similarities to quality systems approaches (Cole, 1999). They were regarded as *best practice initiatives*, exemplary demonstration projects where it was expected that evidence of the successful introduction of new routines and technologies by similar (often local) firms, and information about how this could be done would induce many other firms which might otherwise have been uncertain, to adopt the approaches (Macey and Brown, 1990). They were hailed as a success but were poorly documented. By 2001, the end of the period of this study - they had begun on a small scale in 1992 - they had not made any significant headway on the problem of widespread resource inefficiencies within industry.

The projects - some estimates suggest there were over 140 in many different local areas - presented almost a textbook collection of then current preferred approaches in regard to voluntary regulatory initiatives. They encouraged self-regulatory systems within individual organizations whereby firms could audit and then control their energy and material resource usage. In each,

small numbers of firms (commonly between 10 and 30) were encouraged to audit and control their energy and material resource usage by deploying self-regulatory systems; they received assistance in doing this, generally via subsidised consultancy, financed by grants and contributions from varying sources. The projects were supported by the Departments for Trade and Industry and the Environment which together deployed a recently-privatised unit providing technology assistance to work co-operatively with regulators and local intermediaries such as local government officials, local community organizations, local business leaders, business links, local universities and environmental charities to set up these clubs in their localities, generally using partnerships to do so. The aims varied, for they were locally controlled, (some, for example, also provided training in environmental management and in relevant legislation) but central among them was the introduction and dissemination of new ideas to firms about the ways that they might change their methods of work to reduce their usage of water, raw materials and energy and the effluents they produced. The target firms were largely from manufacturing industry in a variety of sectors (set out in ETBPP 1998d). The regulator, the Environment Agency, was a partner or instigator in many (c.70) of these voluntary initiatives. Around 2001 a number of factors reduced the numbers of clubs in operation. The reported results (not all were reported on and there is no trace of what happened to some) suggest that many of the participant companies both reduced their environmental impacts and saved substantially on their costs. Many laudatory reports and evaluations were written of the clubs, most showing cost benefit advantages for participants. Yet it was difficult to recruit companies to the clubs and external funding was crucial (Waring, 2004) and whilst potential savings for participants from resource efficiency initiatives were estimated at £1.4 billion across the economy (Radway, 2004, using 2003 figures) only some 3,000 companies had been involved by 2004, and there was little evidence of wide diffusion of the practices beyond the participants, (most clubs folded once funding ceased) so that the effect of the projects on the national waste stream was negligible at best.

### The intellectual and political context:

#### Ideas of cleaner technology, innovation and ecological modernisation

These initiatives were studied because they posed a number of difficult, hard-to-understand conundrums. For this reason it is necessary to appreciate their context and the dominant ideas and discourses which influenced them. The next sections of this introduction, therefore, review briefly some key discourses about change - within industry, within the state and within regulation and provide an overview of certain changes being introduced in the ordering of activities of people working together in units. This literature will not be considered in any depth, but these ideas and their provenance in the literature (their putative legitimacy), are necessary to some of the arguments which will be presented about observed regulatory roles within and for the initiatives and their significance.

The projects took place at a time of uncertainty and lack of understanding about the factors which

were contributing to widespread resource inefficiencies. Central questions concerned the association between the environment (in the sense of a preposition referring to the context - both social and physical - of organizations and actors), systems of control over the activities of firms, and the successful introduction of desired changes to technologies. Prominent in these debates were issues concerning the factors which prompt or inhibit innovation and diffusion of new practices and the idea of cleaner technology. These were often linked to a particular modernist and optimistic stance on technological change - the writings on ecological modernisation.

By the mid-1990s, the regulatory norms and industrial expectations around pollution problems had settled into a mode where mandatory control technologies at designated premises dominated thought of what was appropriate (OECD 1995b:22). It was widely believed that reductions in their rate of production of harmful effluents added to company costs. Typically, legislation would oblige firms which produced defined polluting discharges at static sites to take steps to reduce these discharges to meet regulatory standards. Related service industries sold technologies built around this pattern (Greaves 1997:44). As Kemp points out (1993:85), these technologies could be used relatively easily without disturbing existing processes, and they suited the predominantly short-term government policies of the time, focusing on emissions to air and water, neglecting solid waste problems. New ideas about preventing emissions occurring, rather than merely mitigating them, were, however, filtering through (the discourse on preventative approaches is discussed later in this chapter). In these contested debates, the vague term 'clean technology' or 'cleaner technology' was frequently introduced to denote a desirable state of affairs where newly introduced technology - and this could mean capital equipment or practices - either eliminated harmful effluents entirely (this was what was often implied) or reduced them in some way - and even marginal changes were sometimes referred to as cleaner technology (Christie and Rolfe 1995; Ekins 1996; Overcash 1996). At the beginning of the period in which this study was set, cleaner technologies were not necessarily more profitable and might increase costs, there was comparative ignorance about them, the industrial base to introduce them was not developed (Collins, 1997) and there was resistance to change in many sectors. It was difficult for firms to predict benefits given the uncertainties of the new technologies advanced and their incompatibility with prevailing accounting systems (Yakowitz 2000:166); nor was it easy for them, in selecting technologies, to know which standards would be regarded as long term (OECD 1995:27). To make a moral case for such changes was often foreign to the dominant discourses in operation (Jenkins 1998). Cost arguments were dominant (Clayton, Spinardi, Williams 1999:267-8).

There has been considerable research on factors which prompt or hinder adoption of cleaner technologies. This has focused, overwhelmingly, either at the level of policy, (Wallace 1995, OECD 1997a, Kemp 2000a) or at the level of the individual firm considering its needs for factors such as incentives, information, assistance, culture change, etc, (as in the case studies presented in Clayton, Spinardi and Williams 1999) or in terms of attitudes and strategic response, (for example, Johnston and Stokes 1995). These explorations link to the vast literature on innovation,

and the ways in which new approaches can be discovered, developed, introduced to firms within the economy and diffused across it (for example, Dosi et al., 1988; Hemmelskamp et al., 2000; Klemmer, Lehr and Lobbe 1998). Of this literature only one stance is introduced here. Alongside factors such as uncertainty and learning this stresses the importance of institutional structures and 'selection environment' (Nelson and Winter 1982, Chapter 5). New technologies are likely to be more easily adopted where they do not greatly disrupt current work patterns and routines, where they conform to existing consumer and regulatory preferences, and where they are consonant with the skills, structures and patterns of communication and hierarchy of the established organizational arrangements. In this view only when there are key changes in the 'selection environment', for example, with special government programmes or new regulations, or new supplier-user relationships, will innovative technologies take root. Studies for the OECD suggest that innovations introduced to benefit environmental sustainability may face especial barriers, making them prone to systemic failure (Fukasaka 2000:20; see also the guiding principles to assist sustainable innovations developed by Foxon, Pearson et al. 2005).

Whilst introducing cleaner technologies is acknowledged as difficult, over the 20 years prior to the period of this enquiry there had been, nevertheless, evidence of startling changes in practice in some companies. Alongside this were new theoretical ideas, suggesting that the outlook for the introduction of greater resource efficiency in firms might not be so gloomy. Famously, in 1975, 3M had begun an extensive internal programme called "*Pollution Prevention Pays*" to reduce effluents which presented problems to the company (Aspergen, 1999:45). It was a comprehensive approach to prevent pollution at source, (by methods such as raw material substitution, redesign of end-products, process modification, equipment redesign, good housekeeping and inventory controls), to recover and recycle manufacturing by-products (by means of segregation systems), and to appropriately treat and dispose of the residues created. The company only adopted alternatives which improved efficiency in the use of resources and brought financial benefits. The programme continued, with improved results each year, for 14 years<sup>1</sup>, resulting in more than 3,000 approved projects world-wide and reductions of 575,000 tonnes of pollution saving some U.S.\$530 million. The evidence that significant savings could be made in this way acted as a signal to other firms, many of them heavy polluters. Similar developments were tried and enthusiastically reported, providing good PR for those involved. These changes came at a time when there was a huge interest in improving managerial performance and when concerns about environmental problems were becoming more important politically. In terms of 'selection environment', the changes made by companies such as 3M did not challenge their existing institutional arrangements and norms such as the focus on profit, though they impliedly challenged some economic ideas, and were seen as capable of solving some pressing practical problems. The innovative approaches were noted by academics, by journalists and also by governments. A small industry of experts in these new approaches who could act as advisers and promulgators, and

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<sup>1</sup> A new extension of the programme, '3P+', was launched in 1989.

associated new handbooks (some from the US EPA) and journals began to develop, (for example *Pollution Prevention Review* and the *Journal of Cleaner Production*) as well as texts describing the need for, and reviewing the significance of, such measures (Vickery and Iarrera 1997, Norberg-Bohm, 2000:126). Alongside these radical new practical approaches, equally radical ideas which linked these developments to vast social trends, the writings on ecological modernisation, were developing (Hajer, 1995).

It had for many years been considered almost a truism that polluting effluents from industry were a concomitant of development and that costs were incurred in reducing them - they were an externality, a 'social cost' which must be borne by inhabitants or users of affected spaces if society as a whole was to benefit from industry (Coase 1960, 1988, Meade 1952:15-23, 1973, Scott Moreland 1972, 1973, Papandreou 1994). This antagonistic relationship was challenged by a new conceptual framework, which suggested that in advanced economies the two endeavours could progress synergistically (Gouldson and Murphy 1997) by means of technical and procedural innovations which would bring both reductions in damage to ecosystems and improvements in efficiency, remedying "degradation through techno-scientific development and technocratic practices" (Hajer, 1994:172) so that economic growth could continue with a reduction in the levels of ecological damage caused. If ecological modernisation was a real phenomenon, as claimed, then development could proceed confident that unendurable problems would not ensue - cleverness, better government and modernist approaches would of themselves provide solutions. The early examples of companies reducing pollution and saving money, especially where regulatory intervention was involved, became very important as potential exemplifiers of a future new order where economic growth was decoupled from environmental damage. The kinds of changes cited included substitution of more benign materials, greater efficiency in the use of resources, changes to manufacturing systems to reduce effluents at source, and improved environmental management systems within firms: all such matters were later to be advocated in the waste minimisation clubs in the UK. Yet it is important to stress the careful vagueness of the ideas. It is hard to classify ecological modernisation: it is, in many aspects of the writing, (for example, Mol 1995 and the discussions in Hajer 1995 and 1996) unclear whether the claims being made are predictive, theoretic or descriptive. Its attraction, it seems, lies in the optimism of its claims and its consonance with modernism. In terms of its own 'selection environment', the ideas are faithful to the market mechanism, and make no challenges to the existing distribution of wealth and power (Hajer, 1994:72-3), thus potentially enabling the lion of industrial capitalism to lie down with the lamb of vulnerable ecosystems. By the time the initiatives to be examined here began, the evidence for ecological modernisation was still patchy. Adoption of cleaner technologies had been comparatively rare apart from sectors where there was already considerable regulatory pressure for improvements, and the benefits had often been outweighed by growth in output. As the 1990s progressed, various governments carried out projects to trial or exemplify these ideas (without necessarily being conscious of the term 'ecological modernisation'), one of which was the Dutch PRISMA project to be discussed in Chapter 2.

### **Critiques of regulation and Ideas of voluntary regulatory approaches**

Alongside these new possibilities for helpful technological changes, other developments regarding modes of government also set the context for the initiatives and they are reviewed here briefly with the focus on some practical consequences of earlier critiques. As the academic study of regulation developed, so did critiques of the ways that regulation was understood to operate (for overview, see Breyer 1992). One focus was the cost of developing and modifying appropriate regulatory rules to cope with rapid technological change (Gunningham and Rees 1997), another the effective enforcement of very detailed and prescriptive rules (Huigen, 1997:9). The critiques drew attention to the perceived high cost and relative ineffectiveness of standard forms of regulation (OECD 1997c). These came to be characterised by the epithet 'Command and Control', a phrase first used for the U.S. system, where regulators' key tasks were seen as rule-making, enforcement and the application of sanctions to ensure compliance (Baldwin, Scott, Hood 1998:14 and 24). Sometimes the term was contrasted with the more conciliatory style observed in the UK, where there was more dialogue and co-operation, with comparatively rare prosecutions, and a greater emphasis on assisting and teaching regulatees how to adapt to the required standards, which they might otherwise regard as foreign to their own concerns (see Hutter 1997:17). In others, however, the term began to be used less deftly as if it applied to all forms of traditional regulation. In some critiques there was disparagement of the skills of some inspectors (Ayres and Braithwaite, 1992:32), and of the general regulatory role, which was made to appear a relatively blunt task that was comparatively easy both to measure and to achieve. Standard regulatory modes, presented as requiring compliance with rigid, highly-prescriptive rules, were considered intrinsically inefficient, for requiring nearly all firms in an industry to reach the same technology-based standards disregarded the range of compliance costs to which the different firms would be subject (discussed in Sunstein, 1990) and often included exemption arrangements for certain firms (Ackerman and Stewart, 1995:1336). Also, it was argued, traditional regulation was frequently based on technological standards rather than health-based standards (Steinzor, 1998:113-4). There was thus, it was claimed, a system which was more comfortable for old, established firms in affected industries, than for efficient firms. Such regulatory modes might be set in stone, by demanding precise conformity to national and possibly outdated regulatory standards, sub optimal technologies, (Kemp 1993:108) and act as a block, rather than a spur to beneficial changes at a time when product cycles were very short and when many firms operated on a global scale. The situation was summarised by deWitt in 1994: traditional regulation was criticised as imposed from the top, fragmented, with rigid procedural requirements and conducive to confrontation not amelioration; the system worked best for large, clearly identifiable sources of pollution and it was too costly to deal with small-scale emissions or non-point sources in the same fashion.

There was considerable interest in the operation of the kinds of private regulation which existed within individual firms or was operated by some industry associations. This 'voluntary regulation' was self-imposed by industry itself, and was regarded as a means of avoiding the costs of publicly funded enforcement-based systems (OECD 1999a:25) as well as fitting better to the circumstances

of individual firms. Yet the approval was not fulsome - the new right governments in the UK distrusted old-style, 'gentlemen's club' elite styles of self-regulation which excluded outsiders, just as they did established government bureaucracies. Measures to change regulatory bureaucracies and to put in place new modes of oversight were discussed but pitfalls were acknowledged and only some were set in train. As will be evidenced here, some regulation, and some government oversight functions were transferred to arms-length agencies or private organizations. Attempts were made to reduce the number of regulatory rules but these were largely overtaken by proceduralisation measures (Majone 2000). To 'guard the guardians' there were calls for an extension of the regulatory role to other parties such as 'public interest groups', or competitors of regulated firms or even to the regulated firms themselves. There were also calls to maximise co-operative approaches, yet there were pitfalls here also, as the closer relational distance they engendered might encourage corruption (Black, 1984).

Amidst this 'regulatory flux' (a term of Ayres and Braithwaite, 1992:14), the advent of a new kind of symbiosis between state and private regulation was expected. Voluntary regulatory approaches were presented as having the potential to reduce administrative and other costs, to increase flexibility and to build trust, reducing the need for more mandatory regulation, (OECD 2000), creating benefits in PR terms and reductions in stress for staff, and in staff time as there were decreased negotiation and implementation lags. In them, firms or groups of firms could, after careful assessment, decide whether subscribing to rather higher standards than were demanded by law would lead to benefits in their particular circumstances; the system avoided force, it raised standards and did so only where it was economic for firms to make changes.

The idea of voluntary regulation is a key one in this thesis and it is explained here. Its dominant current use is for environmental issues. Webb and Morrison write that voluntary regulation cover a great variety of approaches where:

"a firm or group of firms agrees voluntarily to adhere to a set of environment-oriented commitments which are not a direct part of a legislative or regulatory regime." (1999:229).

It is helpful to see it as at one section of a broad array of modes of social control, with mandatory, strictly-enforced government regulations at one end and self-regulation, of which voluntary regulation is a part, at the other (Gunningham and Rees, 1997:366). Webb and Morrison (1992:230-1) express this:

"... some are initiated at the behest of government, others independently of government, some are adjuncts and refinements to statutory regimes, others have no direct connection to legislation, some apply to only one firm, others apply to many, even across jurisdictional boundaries. In light of this variety, it is useful to view voluntary approaches on a continuum, with some quite closely resembling statutory command-and-control structures at one end, while at the other are voluntary arrangements which draw more on market pressures as stimuli for development and implementation."

In the early 1990s, systems of voluntary regulation were seen as relatively straightforward matters to set in train, carry out and assess; the focus within these writings was very much on the potential to reduce the firm's costs; there was very little discussion in this discourse on regulatory costs, or on the costs of setting up the trials themselves, and the value expected from the expenditure of those monies. Nor, in many of the writings, were the implications of their relationship to the formal systems of law carefully considered. As the secondary evidence described in this thesis will show, it came to be realised that normative aspects of firms' behaviour operate in a close, but poorly understood, nexus with mandatory regulatory requirements. Sometimes voluntary measures might be used as a ploy to delay more formal regulation, some voluntary commitments came to have legal implications<sup>2</sup>; other interventions, which voluntarily supplemented the requirements of formal regulation, came to have lasting impact on the practices across industries. (Of course some had virtually no effect at all - and this was also unanticipated - firms attended to the stipulations of formal regulation and ignored the option of supplementary standards). Largely innocent of these complicating factors, many voluntary initiatives were begun.

Circumstances were amenable to such forays. Daintith (1994:216-20), noted that in the early 1990s it became possible to run a policy or programme based on spending, rather than on powers to restrict liberties, 'on a short term experimental basis, without the need for special legislative authority, *until its effectiveness has been demonstrated.*' (italics mine). In other words, it became easier for departments to authorise expenditure for small initiatives to be undertaken just to see what might work. Such initiatives could be used for testing out new ideas at little cost and little risk of criticism. If there was little pressure they could be continued for some time as evidence that something was being done about particular problems, and if the scale of the experimentation did not match that of the problem, it was likely that they could argue that a small-scale trial was chosen as a matter of caution. Additionally, Daintith suggests that short-term experimentation also came to be used where government had incomplete information (p.220), which of course, is a common experience in regard to environmental issues. By the beginning of the period of this study, therefore, voluntary approaches were regarded as excellent for small scale, relatively cheap trials exploring environmental problems, for if they worked they promised a quieter life with industry, and if they did not, little was lost. Daintith uses the term experimental - but this will depend in each case on the seriousness with which assessment and evaluation of the results was pursued.

Thus the waste minimisation clubs were seen as appropriate measures in relation to these discourses on regulation. They were seen as ways of demonstrating new forms of regulation where firms would adopt higher standards voluntarily, which might be more efficient (Gunningham and Rees, 1993:364). This was in contrast to the situation in many other countries,

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<sup>2</sup> For example, under certain circumstances acknowledged adoption of voluntary standards may lay a firm open to a claim in negligence if those standards are breached; they may fundamentally shift the standard of care expected by that firm or industry, and thus make a firm liable in cases of strict liability.

such as Holland, Germany and Switzerland, where the focus of measures to reduce emissions and wastage was much more on voluntary agreements<sup>3</sup> between polluters and the government (Kemp 1993:105). Interestingly, the waste minimisation clubs were not described as experiments but as 'best practice' projects, (for after all, their aims exemplified the values of those in power - increased efficiency by individual firms). There seemed no doubt that they would work. (The literature review will reflect on these conceptualisations about the workings of voluntary regulation, and note some recent developments in the literature which appear to assist understanding of the kinds of scenarios found in 'best practice projects,' where the social processes lead to much looser adoption of new normative standards by organizations, and to a greater role for the announcing of such changes.)

#### **Changes to state practices: network governance**

Contemporaneously with these developments concerning the ways that different forms of regulation were being classified and conceptualised, political scientists noted new patterns of interaction developing between government and other organizations. There were signs suggesting that some aspects of government were less hierarchical, with a new recognition of interdependence (Kooiman 1993a:4), a new readiness to admit new parties into the activities which comprise government, and increasing use of partnerships of various types.

Responsibility and accountability for interventions were also being treated in a new way; the increase in short term experimentalism in government and regulation was coupled with a general concern to bring greater efficiency and with it systems to measure that increased efficiency. The clubs exemplified several of these new features. These new patterns are often described as *governance*, which is defined as 'self-organizing, interorganizational networks' including not only government, but 'non-state actors'. (Rhodes, 1995:11; see also Nava Escudero, 2001:76-85). In the new practices there is a perceived new emphasis on enabling learning processes and thus self-organization, and on a spreading of regulatory roles (van Vliet 1993:106). Notably, the administrators here are described as having more political roles than would be expected if they were mere tools of policy-makers (Kooiman et al 1993a:3; 1993b:255-7). Sabel, writing of such systems in 2001, notes that, increasingly, the administrative centre does not define rules and means of policing, but sets up the infrastructure for broad projects, setting 'provisional general standards' and, interestingly, "pools measurements of performance to allow refinement of the general standards as well as the particular local strategies in the light of results. The resulting organization is neither a formal bureaucracy nor an informal network, yet it combines the capacities for super-local learning characteristic of the former with the access to local knowledge characteristic of the latter." (2001:123) Frissen, who takes a post-modern view, points to the use of temporary, *ad hoc* and *fragmented* network governance in the Netherlands, which is not integrated with the centre, and likens this style of administration to an archipelago rather than an old-style pyramid. He argues that the increasing appreciation of self-regulatory modes is linked to a new kind of

<sup>3</sup> often termed negotiated agreements or covenants

interaction between the administration and social actors (1999:230) set out in contractual arrangements arranged as if the parties were equal, and exhibiting, not the expected principal-agency relationships, but rather an “equal, collaborative association in which the content of the project itself forms part of the collaboration” (Frissen, 1999:10). Thus there is rule-based behaviour, but based on contract and performed by intermediaries, who have an increasing role in both setting what is considered to be policy, and in carrying it out and reporting back. Frissen contends that these patterns lend themselves to a variety of ‘image creation processes’ (1999: 230).

### **Concluding remarks on the context of the initiatives**

Three further layers, each to be drawn on in the concluding chapters, conclude this contextualisation. Set within these developments was an observed preference for the use of quantification, which was, by the late 1990s, being seen as an ideal, objectively derived means of shared communication between the scientific and technical experts of the academy and the political and regulatory communities (Porter 1995). The perceived reproducibility of numerical findings was considered as a means of social control over potential opportunistic behaviour (Fligstein 1998:331). There was a converse trend for qualitatively-based evidence and professional expertise to lose status, most notably in matters related to economics (Tony Lawson, personal communication, 2.7.2004). There is a flat, naive quality in much of the writing supporting quantitative approaches; it seems (to me) to implicitly repudiate the possibility that numerical evidence has, itself, qualitative and symbolic aspects. This lucid, but simplistic use of numbers was to form the backdrop to communications about the clubs.

Academically, linked to the discourse on changes in the state and its mode of governing, there began to be a questioning of policy methods and policy instruments. The classic approach to policy making is linear, presuming that there is an entity called ‘policy’ created by ‘policy makers’, which is put into effect by a defined set of mechanisms described as ‘policy instruments,’ the effects of which can be evaluated against an anticipated outcome of successful change, for example in terms of efficiency or economic factors. This way of conceiving what occurs, and particularly the analogy with tools or instruments, is implicitly instrumentally rational. (It also carries an expectation that the ‘tool’ can work). There had been earlier criticism of this schema in the 1970s literature on implementation, which revealed that execution of policy was not straightforward but involved on the one hand, considerable discretion, and some manipulation of rules, by implementers, and on the other the resistance of those groups expected to obey the new policies. This criticism had led to practices of providing more ‘discretionary action space’ to facilitate implementation of new policies via partial decentralisation, and of looking more favourably on alternatives to legal rules to circumvent resistance (Mayntz 1993:13-14). By the late 1990s, newer writing went much further and was challenging the notion of policy instruments, asserting that the categorisations of instruments were neither exhaustive nor mutually exclusive (De Bruijn and Hufn 1998:27), ignoring the interplay and interdependence between goals and

means in policy-driven interventions (Bagchus 1998; Guy Peters and van Nispen 1998:2-3), the complexity of the environments in which they must operate (Grabosky 1995), and the mutual dependencies between implementers and those in the local worlds in which they act (de Bruijn and Hufen 1998). Despite the apparent obsession with economy, efficiency and 'outcome' measures, some began to question the *ad hoc* nature of evaluatory systems for policy interventions (Roe, 1994). These concerns linked to others: that many new policy instruments were not carefully chosen to solve the problems for which they were used (Mayntz, 1993:10); it was argued that in many cases they acted primarily to tell people what the government was thinking, so that their role was primarily symbolic. Yet voluntary initiatives were being classified as new types of policy instruments making uses of multiple discourses - was that categorisation appropriate? Voluntary regulation had been treated as straightforward, as capable of being understood by accounts of evaluations of short projects. To understand why it was chosen was not equivalent to understanding how it operated. Should it, too, be problematised?

The last layer of contextualisation concerns fashionable ideas of what constituted good management approaches and the ways that these were spreading, and encroaching not only on established public and private organizations but on practices of government and to some extent regulation. The 1990s were a time when, in Britain, new ideas of how managers might be successful, some of them long past their sell-by date in the U.S, (Abrahamson 1991) were being enthusiastically promulgated. Often this involved the proffering of simplified, portable, and therefore decontextualised practices (Sahlin-Andersson 1996). The state's encouragement of the use of private sector management approaches in the public sector vied with earlier core values of practice based around professionalism and service (Rhodes 1997:92 citing Henkel 1991:230). The use of audit also reinforced these new values (Power 1994). The new expectations that managerial modes of thinking would solve problems had led to vastly increased deployment of management consultants by government, especially for providing evaluation services and advice (Rhodes 1997:92 citing Efficiency Unit 1994:46-7). The new financial stringency which was being imposed on the public sector was also beginning to encourage public sector organizations which had the need for more funds, to begin to deploy their own staff on management consultancy, and this was the case with several universities.

Thus the setting at the start of the initiatives was of discourses which stressed effectiveness and efficiency in the context of an apparent underlying optimism, yet at a time when the effectiveness of regulation itself was being questioned. The initiatives were typical of the trialling of new approaches, which were small-scale, quantitative in focus, amenable to business, co-operative in nature (Huigen 1997:9), and set in train in the midst of existing, more dominant agendas and alongside a stream of other new policy measures. It was appreciated that governmental roles were increasingly being assigned to purpose-created organizations and agencies, and that greater use was being made of consultancies. This was especially so as financial strictures impacted on public sector organizations such as universities, which, under pressure to bring in new funds,

sought to supplement their resources by grants or consultancy work. They, too, moved into areas of work often based on projects, such as those presented by voluntary regulatory 'best practice' initiatives. There was an expectation that such 'demonstration projects' would be based on partnership approaches involving new kinds of third parties, and would "succeed" but there was little understanding of the factors shaping claims making, and how the interventions might connect with other systems, nor of the forms of rule systems, the 'ways of doing things' which might operate concerning these reports, given that the settings were new, provisional, co-operative and flexible and that the parties were from different (institutional) backgrounds).

To underline the characteristics of these features of these new projects, I list here other possible measures which might have replaced them, in attempting to improve resource efficiency in British firms. These included phasing out environmentally damaging subsidies, measures to encourage the development of markets for beneficial goods and services (including labour markets by facilitating retraining), use of environment-related taxes and tradeable permits, creating appropriate regulations, and gaining public support. Other measures possible included supporting educational and other kinds of information programmes to inform the public and industry of the environmental consequences of their choices, supporting further research on the topic, creating voluntary or mandatory performance standards, introducing requirements for information release from firms on their performance, incentives to diffuse technologies that support more efficient resource usage and facilitating public-private and inter-firm collaboration on cleaner technologies, whilst encouraging new voluntary codes of conduct in the private sector. Yet, as will be detailed in the next chapter, the choice was made to copy initiatives from other countries, which, besides displaying the features outlined above, were also legitimated by careful research papers recording success. Having outlined the intellectual and political context for the initiatives, the chapter continues with details of the research problem, the potential significance of the research findings and the circumstances of the study.

### The research problem, main research question and the potential significance of the research

This thesis examines one instance of a type of initiative where the state wishes to encourage a certain behaviour with beneficial outcomes, and uses to bring about change, not regulation linked to a hierarchical power system for its enforcement, but a voluntary approach, outsourced to intermediaries and run for a limited period using the project form<sup>4</sup> with the organization entrusted with the work subject to a governance system based on contract. This means it has common features with scenarios studied using institutional theory by a number of researchers beginning with DiMaggio (1983). He has commented that such lines of research describe organizations

<sup>4</sup> Other examples of such an approach in the UK include the *Waste Resources Action Programme* to encourage recycling of materials, and *Warm Front*, a programme to encourage the energy poor to become more energy efficient. (interview with Robert Lawson, Environment Strategy Director of DEFRA, 18.5.05).

being “powerfully affected by actions that originated in the state but involved little or no coercive power and worked largely through the construction of fields of non governmental organizations (including for-profit consultants).”<sup>5</sup> The studies carried out, discussed further in the literature review, have each, in varied ways, intriguingly concerned unanticipated consequences - either of clearly voluntary initiatives, or where forms of regulation introducing apparently mild changes give rise to (unpredicted) significant voluntary changes. It is important to improve our understanding of such ways of influencing by the state, given the increasing use of voluntary approaches to regulation. It is also important that we appreciate both the force and strength of theories and their limits of usefulness. Here, the central question of the thesis<sup>6</sup> is not a practical one but is concerned with how these initiatives might best be theorised and asks:

**To what extent do the constructs of institutionalist analysis prove useful modes of analysing what occurs in voluntarist project-based approaches to government and regulation?**

I would argue that it is important to see if the evidence about these initiatives can be placed satisfactorily against broad a theoretical framework which is also applicable to the more usual modes of regulation, for if this can be done there is potential for valuable comparison.

There are further justifications for this approach centring on institutional theory. This topic is about projects, which are increasingly a part of organizational life. Yet theoretical writing on institutionalism concerns, in the main, the long term, and the project, although it can be considered a new organizational form, is difficult to conceptualise in terms of such a theory. It is important to understand to what extent the established constructs of institutional theory can be used to explain facets of modern organizational life and what are its limits. It was therefore decided, somewhat counter-intuitively, (for to examine projects using institutional theory might not, in the language of that theory, be considered appropriate) to examine the project form within the theory because it would both test the limits of the theory and might demonstrate some aspects of the project form of organization and the operation of sets of rules within it, which might not otherwise be apparent. There is little literature on this, but the matter is being explored by W. W. Powell, who has written on the changes ensuing as the project form is being used increasingly, alongside more traditional organizational arrangements (Powell, 2001:32).

The research may also be considered significant in other respects. There are expectations that the use of new organizational forms will change governance systems within fields, but few studies of the difficulties and contention presented by the deployment of new forms and the shifting modes of governance as they operate against and alongside more traditional, hierarchical forms of regulation. The research may also contribute to the regulatory literature because it examines engagement in proactive work by regulators and the issues this can raise. This has been very little discussed in the literature and does not fit into dominant categories describing regulatory behaviour, yet such campaigns are a common facet of the work of many regulatory bodies today.

<sup>5</sup> Comments of Paul DiMaggio in an encouraging email of 15.3.05

<sup>6</sup> The themes of the research and subsidiary research questions are set out in Chapter 4.

A further aspect of the research is that it focuses on the actions of intermediaries (Cudahy, 1998). The interventions typical of the new modes of governing have, in the main, been examined at one of two levels, the level of the deemed policy making process, and that of interactions with the deemed locus of implementation, the affected individual firms. Such researches follow the line of debates regarding the perspective of 'policy instruments': 'top-down views' stressed the role of those at the top of the hierarchies, and 'bottom-up views' the importance of implementation of those policies by those at the base of bureaucratic pyramids. Yet it is increasingly appreciated that firms are embedded in many social relationships, as are those who set out policy documents, and with recent changes to the state, more of its roles are being assigned to purpose-created organizations or agencies, and greater use is being made of consultancies. Intermediaries such as university consultancies, local business advisers and community environmental activists worked to assist businesses to change and to teach them new ways of operating. Many new public management and other projects must necessarily employ intermediaries such as consultants, yet their role, costs and motivations are rarely taken into account and the literature is largely silent about their potential role in new forms of governance. The use of consultants within policy and regulatory processes is, as Mary Douglas (1987) might say, so taken for granted as to be largely invisible. An examination of their role and influence here may make a useful contribution to understanding the new ways in which policy practice is developing.

Also, many numerical results from such short-term initiatives have been treated as unproblematic. Here, evidence about them presents a range of problems, some of which could be related to the role of the intermediaries in the projects and to the mechanisms for, and the quality of the regulation of these voluntary regulatory initiatives. Using institutional theory to explore local partnership projects set underway by policy endeavours seems likely to advance knowledge in this area, either by providing greater understanding of the activities and understandings of the parties, or, conversely by revealing the limitations of these theoretical concepts for examining short term activities at the margins of organizations. Such initiatives might be categorised as 'new environmental policy instruments' and whilst there is considerable academic work on this topic, many of the papers are not strongly theorised. Finally, the clubs comprise best practice initiatives, types of initiative often used in the UK (particularly in the construction field) yet rarely described in the literature on voluntary regulation, which is dominated by discussion of negotiated agreements.

### The terms waste minimisation and pollution prevention

Because the thesis will go on to discuss in some detail the claims-making about the initiatives and the interactions between the varying groups working on them, details of the terminology used, and the issues which this sometimes raised are set out in Appendix 3. Here it is necessary only to note two central terms which acted as symbolic 'flags', signalling intention and (often) ethical stance on what occurred. These are 'waste minimisation' and 'pollution prevention'. Within the initiatives the term waste minimisation was generally used to mean reductions in inefficient use of

resources of all kinds, whether solid materials, fluids, gases or energy. The definition used within this thesis is straightforward: the reduction of materials and energy usage at source, as a separate activity from reuse or recycling; such reductions nearly (but not always) reduce harms to ecological systems, so that this definition is treated as consonant with the term pollution prevention unless indicated otherwise.

Pollution prevention was a term from the United States, proposing a radical and holistic approach, counter to and more radical than pollution control, the established mode of dealing with polluting industries (Freeman et al. 1992). The idea that pollution might be prevented not only challenged the different (media based) professional disciplines in environmental technology and regulation, but when accompanied by claims of cost-saving (Schmidheiny 1992) countered common assumptions within environmental economics. As Fiorino expressed it (2001:74), environmental regulatory standards would become not the ceiling of what was achievable, but the 'floor' for companies continually improving their environmental performance. The approach, however, perhaps linked to its challenge to the established orders, had not been widely taken up at the start of the period of interest of this thesis. Hirschhorn, in a famous article mourning this, and seeking explanations for our social failure to choose 'benign technology', (1997, reprinted 2000), points to semantic confusion and misleading claims, but above all, to issues of power and (though he does not use the terms) institutionally embedded practices, as contributing to this.

### **The circumstances of the study**

This study began when the researcher was working as a specialist in waste minimisation for the environmental regulator, the Environment Agency, which supported the first years of the study financially. This work role heavily influenced the location of the case studies, as in one case the researcher was a member of the partnership steering group for a club and was able to observe as a participant; the second case study was also within the purview of an Agency Steering Group of which the researcher was a member and one of the reasons for its choice was that it would be easy to reach by public transport. The Agency was a science-based organization and initially it was understood that a numerical analysis, even if from a university concerned with the social sciences, would be most appropriate for an employee to provide. Accordingly, the research initially focused on the measurement and accounting systems used, and the researcher sat on both the National Waste Minimisation Steering Group and its measurement subgroup at the time. After reviewing certain evidence which had been gathered, however, it became clear that such systems would not be reliable indicators of what occurred. Nor was it considered that cost benefit analyses, which had been frequently used for evaluations of individual clubs or selected groups of clubs, were appropriate for forms of activity which claimed to show 'win win' features - for the basis of CBA is that a clear distinction can be drawn between costs and benefits (Layard and Glaister 1994). It was only after examining papers from the accounting literature on institutional context that the focus of the study turned to possible institutionalist interpretations of what was occurring and of the evidence gathered and the possibility of symbolic usage of numbers in what was being

claimed. Thus the study was shaped and constrained by the researcher's own membership of the regulatory body and knowledge of regulatory practice. The data which was found was also influenced by the fact that as someone committed to the greening of business she was known and trusted by a number of those working on the initiatives who gave their views and understandings of what was occurring frankly.

Whilst this is an exploration of a 'real-world' problem, where it is often difficult to distinguish contextual factors from central matters (Hedrick, Bickman, Rog 1993), there were fortunately several delimiting factors which followed from the circumstances under which it has been undertaken. Because the decisions to trial and then run clubs had already been taken, no part of the thesis concerns these choices. Also, because final outcomes are at the time of writing not known, the focus is on process, not on what Kaplan (1964:7) has called "reconstructed logic".

### **Conclusion to chapter and thesis structure**

Thus the focus of the thesis is to be on explaining specific aspects of one set of voluntary projects, which have not been explored from this perspective in previous evaluations. Chapter 2 uses a historical approach, describing the introduction and spread of the projects and concludes with a brief review of some previous evaluations of these initiatives which sets out their perceived limitations; for brevity, this chapter includes some research findings. The third chapter is a literature review examining constructs and ideas from institutional theory and considering their appropriateness for exploring these voluntary regulatory initiatives. Chapter 4 sets out the research questions and the design of the study in detail. Chapter 5 presents evidence from two case studies including a longitudinal study of the effects of one of these club initiatives, before chapters considering four specific categories of intermediary involved. The penultimate, discussion chapter, reviews the empirical results, considering how the activities of intermediaries such as these, working on projects, might be categorised within institutional theory. One section of this chapter exemplifies some of the problems regarding evidence by setting out what is here construed as the standard 'Account' of the clubs and their expected benefits so that it precedes some counterclaims recorded about the operation of some aspects of the projects. This prefaces a discussion of the significance of the research findings for understandings of, and practices regarding, voluntary regulation. The concluding chapter reflects on the findings, considering their limitations, significance and potential practical usefulness, and makes some suggestions for further research.

## Chapter 2. The Waste Minimisation Clubs and the claims made about them

The waste minimisation club initiatives were introduced to the UK in the early 1990s, and this chapter sets out the background to this, describes the operation of the first club (which set a trend for dozens of others), and considers the claims made about them. It goes on to explore some of the reasons for their proliferation, and the ways that excellent results from them were used in policy documents. The chapter ends by reviewing previous evaluations of the clubs and their perceived limitations. (In the interests of clarity and brevity, the details of the claims-making about the clubs, which are important for the argument of this thesis, are not drawn solely from secondary materials and include some empirical evidence gathered specifically for this thesis<sup>1</sup>.)

### The first waste minimisation clubs and their characteristics

In one of those instances where words confuse us, in the UK, waste minimisation measures were perceived as linking to policies on the management of wasted materials<sup>2</sup>. It is therefore necessary to know something of these policies and the culture they represented, in order to understand the dominant concerns and debates of the setting within which the measures to introduce the clubs were based. Appendix 5 details the national policy on waste and resource efficiency, emphasising the historic reliance on landfill which existed and how the culture of the waste management industry and its regulators reflected this, with few facilities for measurement and discourses focusing around expertise in classifying different categories of wasted materials, or on the operation of landfill itself, and relative neglect of the possibilities presented by alternatives. By the beginning of the 1990s, countries across Europe were beginning to consider how to reduce or treat wastes, and to promote recycling, prompted in part by global discourses concerning the need to protect environments, and in part by policies of the EU. In the next years many hundreds of voluntary initiatives took place with regard to industrial resource efficiency and clean technology, often assisted by governments and deploying regulators, and trialling different approaches to minimise wasted materials and energy.

Some trials in Europe exhibited features which were to prove very acceptable to British policy-makers. They took the form of 'best practice' initiatives with time-limited funding. They were business friendly and showed businesses as behaving co-operatively to assist in solving major social problems whilst acting in their own best interests. These were waste minimisation clubs, the first

<sup>1</sup> The way this was gathered is set out in Chapter 4.

<sup>2</sup> The passage of time, and the difficulties of tracing key staff then working in the department concerned made it impossible to investigate this early policy decision.

reported as starting in Landskrona in 1987. This focused on waste minimisation opportunity audits and involved 6 small and medium-sized enterprises in the chemical, metal-working and graphics industries; it was funded by government bodies, local authorities and a voluntary foundation and run from an environmental research organization TEM (Technology, Environment, Management) at the University of Lund. Five years after commencement improvements in resource productivity were still ongoing in the firms (Lindqvist 1995:28; Gee 1995).

The next club, the PRISMA Project (a Dutch acronym for *Industrial Successes with Waste Prevention*), evolved from a partnership between the Universities of Rotterdam and Amsterdam, running from 1988-90 and involving 10 companies from different sectors (Dieleman and de Hoo 1993). It also used waste minimisation opportunity audits to promote cleaner technology, employing procedures developed in the USA. There were 4 stages to the activities: a planning stage where the project team ran a preliminary study was followed by assessments of problem areas within each firm to generate options for preventing the generation of waste materials (35 priority areas of activity were investigated in detail), and these led to a stage of analysis of technical and economic feasibility and environmental effects. The final stage was the implementation of the selected options, setting up measurement systems to record changes and management arrangements to incorporate prevention activities within the firm for the future (de Bruijn, Coenen and Lulofs 1996). Of 164 possible options to reduce effluents and waste materials, about 134 were deemed 'worthy of consideration' [this term was not explained]; 45 options had been implemented by the end of the project, of which 25 were cost-saving and 19 neutral in terms of costs. Some savings were staggering, one company saving \$120,000 per annum from an investment of \$1,250. In particular, some good housekeeping changes led to 25-30 per cent reductions in chemical usage and certain companies reduced their waste and emissions by between 30 and 80 per cent, eliminating certain waste flows completely. Other benefits claimed included improved product quality and improved capacity to comply with, and anticipate future changes in, regulation. A third club, the SPURT project, ran in Storstrom County, Denmark in 1991, involving 8 companies from greatly varying sectors; in this case the company staff were trained so that they could do their own auditing (Gee, 1991). These clubs very much set the pattern for later developments in the UK, a series of steps or stages, consultants suggesting ideas to companies, only a proportion of which (mainly the cheaper, or no-cost options) were implemented.

In the UK the potential significance of the early demonstration projects was recognised by the Centre for Exploitation of Science and Technology, a small, not-for-profit consultancy. CEST is a consultancy which analyses potential new technological opportunities and networks with industry, academia and policy makers, (it is part privately, and part government funded), aiming, by the provision of information, to stimulate the uptake of promising new technologies. Early in 1991 it became convinced that waste minimisation and cleaner technology should replace the current UK industry norm of end-of-pipe treatment. (Diana Bradford of CEST, interview, 17.1.2000)

The relevant ministries, the Department of Trade and Industry and the Department of the Environment, had, in the early 1990s, no measures in place to support waste minimisation in the way

that it was being supported in the U.S. The approach suggested by CEST had the potential to neatly fill this 'policy vacuum'. As will be seen, the choice was a voluntary, best practice initiative which involved the regulator and promised participant firms substantial savings on costs. This ostensibly seemed to provide a 'programme of persuasive communication' (a term of Schneider and Ingram 1990) which would make others in industry see waste saving as desirable; the involvement of the ministries and regulators would show it was associated with people in authority; the training provided would provide skills and delimit barriers to performance; the financial logics used would provide incentives for firms to take such measures. Once it was assigned to a third party outside government to run, using a time-limited contract, and with the stipulation that there was to be merely the passing of information - not assistance - to firms, and once it began to be adopted within individual local areas, (with the potential for local governments to gain experience in dealing with what seemed a rather intractable problem) there was (almost) a perfect, copybook new public management solution, which (almost) perfectly fitted neoclassical approaches to inefficiencies within firms. With this preview, the next sections set out what happened.

#### The Aire and Calder Project and its operation

Influenced by the Dutch project PRISMA, and with the involvement of the DTI, CEST set up a similar project in the North East of England with well-established project partners including regulators. This first waste minimisation club in the UK, the Aire and Calder Project, ran from 1992-1993 and was very well-reported. The way in which the Clubs operated varied over time<sup>3</sup>; Aire and Calder, however, set the essential framework for many of those that were to follow, and some of its influential features are outlined here, before a consideration of the position in 1995, when the major expansion in the use of these projects began.

There was a geographic base for the project; this, it was stated, would provide a 'common interest' for participants and link the project to the 'local community'. Given the concerns of the major regulator involved, the National Rivers Authority, a geographic base was, however, vital if the project was to secure their funding and support. The focus was a Yorkshire catchment subject to considerable pollution, both from direct industrial effluents and from poorly functioning waste water treatment works owned by Yorkshire Water (the privatised utility company responsible for securing water quality which was one of the sponsors of the project (CEST, 1994). Other sponsors were the BOC Foundation, (a private foundation which supported innovative environmental initiatives) and two regulatory bodies - the National Rivers Authority and Her Majesty's Inspectorate of Pollution. It is revealing of the co-operative nature of regulation in the water industry at that time that it was thought appropriate for the two regulators and a major regulatee to work together proactively in this way. In fact, the NRA and the Water Companies had been one and the same organization before privatisation. The three major sponsors of the Aire and Calder project formed a steering group which met together to oversee delivery; later it became common for steering groups to include representatives from other intermediaries. These commonly included local authorities, business support organizations such as

<sup>3</sup>Pratt, Phillips et al, 2000b:116 provides a classification of the types.

Business Links, Chambers of Commerce, the relevant grant-giving bodies and a selection of representatives from organizations such as environmental charities, regional government offices, local universities and colleges offering associated courses and consultancy, local community groups or environmental non-profit organizations, waste management companies, and consultancies (Johnston 1995).

The Aire and Calder club comprised 11 large companies, several of them in the chemical industry. Gaining members has proved difficult for most of the waste minimisation clubs and the reluctance of firms to engage is discussed later in this chapter. Commonly, club initiatives trawl for members, often using databases of contacts of the sponsors or their allied organizations; recruitment events are common. Where firms show interest, it is usual for visits to be made to assess suitability (for example, the commitment of senior management is seen as a vital factor). Such clubs, therefore, did not comprise randomly selected companies, or even self-selected companies. The Northampton Resource Efficiency Project, for example, took 6 months to recruit, the organisers report that they wrote to 2,500 companies, 40 were sufficiently interested to attend a seminar and from these 22 were selected to take part (Pike 2000). These were NOT initiatives involving representative or otherwise typical companies. In each member firm, the club chose a contact person for the initiative - known later as the project champion. This is a common device used by those trying to inculcate change within firms: it can be seen as what Grabosky (1995:7), refers to as 'promoting the role of compliance constituencies within organizations' by conferring status (from outside the organization) on someone engaged on tasks associated with sought-for rule-following. The ideal 'champion' is a skilful and respected senior manager who is identified with an innovative programme and can express the rationale for change to both senior managers and lower ranks (Dawson 1994). There are also parallels here with the concept of strategic agency in bringing about changes in organizational fields, by strong and convincing advocacy of a new position. This person was considered crucial in bringing about changes in practices (Waring 2004). Some firms failed or faltered in the initiatives, either because their champions under-performed (usually because of time constraints), or moved to new posts, leaving no-one to shoulder the burden of effecting changes to systems. Lowndes, (1999), makes the point that the rhetoric of new management in local governance stresses the role of the 'champion', carrying the assumption that all could be 'winners' once convinced, and contrasting the old and new states of affairs. (Despite the positive expectations aroused, her research suggests that many 'old' management practices were tenacious.)

The total cost of administering and delivering the Aire and Calder project was £400,000<sup>4</sup>. It was atypical of later clubs in one particular respect: it focused only on water and liquid effluents. Later clubs considered effluents affecting all media (despite the name 'waste' minimisation clubs). The membership of Aire and Calder spent over £2.5 million annually on water or effluent charges and so had a strong financial interest in reducing inefficient usage of water. Nevertheless the companies' contributions accounted for only one quarter of the total cost, the rest being provided by the

<sup>4</sup> This does not make any allowance for savings made by participant firms.

sponsors, and this dependency on external funds became typical, as was the fact that its setting up was largely driven by potential service providers, frequently as part of a larger grant-bid.

The actual delivery of the project was given over to consultants, March Consulting, and half the money for the project (£200,000) went directly to March. In other words, the initiative essentially revolved around subsidising specialist consultancy services for the participants, who might have provided it themselves. Whilst there were other important aspects to the Clubs, self-learning and cultural change among them, this need to subsidise the expertise of consultants was a central issue (there was a related one to pay for the management services provided for the initiatives). It is part of the argument of this thesis that the role of such intermediaries in these voluntary initiatives has been generally disregarded and that their activities, which hinged on the financial and regulatory basis of the projects, were a significant influence on what occurred and, as important, what was reported. Expert consultants with skills apposite to a particular firm could deliver high-quality advice which might save companies hundreds of thousands of pounds. Yet such consultancy was expensive and the level and nature of the skill of the consultants could vary considerably. Quite a number of the consultants were process engineers or energy specialists; some had a quality systems background; others were based in Business Links. The amount of 'consultancy' time spent with each participant firm varied quite markedly from club to club. Increasingly, as universities became involved in running the initiatives, numbers of lecturers or ex-lecturers, often in various aspects of environmental science, began to work on clubs. The work could be profitable. March, having had such success with the first club, became the consultants of choice for many of the later initiatives, and their staff developed considerable expertise and cachet. Other major consultancies also came to specialise in this work. There were sometimes local factors at play in the choice of consultancy firms used, with evidence that some Chambers of Commerce preferred to employ their own members (comment by Paul Barker of Business Link, 10.10.2001). Where consultants were less expert, firms might find themselves complaining - as some Dutch companies did - that they were being offered what they knew before.

As time went on there were pressures to reduce consultancy costs<sup>5</sup> and hence the costs of the projects. Some of the later clubs tended to use cheaper advisers, or to obtain another subsidy to pay for consultancy. Another approach to cut costs was to employ environmental students, often on courses at universities which were service providers, who might gain work experience this way. Some newcomers were very successful; Carrie Roberts, for example, then a recent graduate working with the London Environment Centre, saved one firm several hundred thousand pounds. (interview 23.9.2002). In fact, the literature about the clubs stressed that anyone might help by turning "a fresh pair of eyes" on the problems, and this democratisation of facilitating 'win win' was used as a reason to turn to cheaper consultants, to students or regulators to perform the role. This strategy was not always effective: Phillips, Read et al. in a review of club activity noted that lacking skilled project teams, many clubs "founder through lack of expertise and the inability to respond to new, unforeseen challenges" (1999:244).

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<sup>5</sup> Phillips, Read et al, 1999:238 point out that daily fees of £700 were common for consultants working on clubs.

A distinctive method of working (Yakowitz 1995) has been used in the clubs, based around auditing of flows of materials, by-products and effluents (see, for Project Catalyst, W.S. Atkins 1994:9; for Leicestershire Waste Minimisation Initiative, Kersey 1995:56-60). Typically, the consultant (or an assistant, possibly the project manager from the intermediary body which set up the grant) visits each firm, and together with the staff, by monitoring and observation, draws up a mass balance of material flows within specified processes and then identifies potential ways in which physical resources or utilities might be saved or effluents reduced. A 'waste audit' (sampling and determining the points of arising of materials discarded as waste, in a single, typical, defined period) is a common method to establish a baseline of materials and energy usage from which to compare later trends. Yet in a good number of instances - for industrial companies are very variable - difficulties were met which could not be resolved by the recommended method alone (for example, see the various concerns voiced in the subsidiary report on Project Tyneside (O'Brien and Mowbray 1999b). This accords with the findings of Newell, Swan and Kautz (2001) of a tendency for projects introducing new systems to present simplistic copybook approaches which fail to allow for the complexity of translating ideas into new circumstances. Over time the clubs' typical format changed. There were further attempts to categorise the forms: Waring (2004) suggested that they varied from 'extended consultancy report', 'workshop based with limited consultancy' and 'self-help with workshops' but found no clear correlation between the form and degree of success. Staff training seems to have featured increasingly as time went on, especially where university departments came to act as service providers, and may have been taken up because the lecturers construed their main role as teaching and were more comfortable using these skills than with providing technical consultancy.

The club meetings frequently involved sessions where representatives of the participant firms reported back on ways they had discovered unsatisfactory practices and taken action to remedy them; they also often discussed problems, seeking advice from other members (e.g. Keighley Business Forum Waste Minimisation Programme, reported in ENDS 1999:10). These sessions were often perceived as very helpful by members. Styles varied considerably and some had a declamatory, rather evangelical, air, with members enthusiastic, even jubilant at the savings their involvement had brought about. Johnston and Stokes (1995:17) reported 70 per cent of the participants in their study considered the club approach useful: providing inspiration and information, creating pressure on them to act, and, curiously, reassuring them that others had similar problems and providing 'a sense of community'. This reported co-operation, with relatively open disclosure of difficulties and exchange of advice between firms, concurs with findings by Huigen who, in studying responses to new Codes of Practice, found occasions where larger firms readily assisted smaller (1997:9). It is also interesting as it suggests managers were offering, as it were, free consultancy to those in other businesses. Such co-operative and helpful attitudes were not universal, however, and Phillips, Read et al, (1999:241) note:

"members of sector clubs are often reluctant to share recently developed Best Practice because it is conceived as possibly bestowing a competitive advantage on rivals."

It is emphasised that the term 'Waste Minimisation Club' was a misleading name for this type of

initiative<sup>6</sup>. First, very few of them were recognisable as clubs in the common sense of that term, for they rarely met together to socialise. They comprised groups of companies recruited and selected by those running the projects: 'member run clubs' have been very unusual. It was rare for any continuation after the end of the projects. Douglas Robinson of the DTI confirmed this, saying of the first clubs:

"I suppose there was a vague hope that they might continue .. and be self-sustaining .. but really they were set up as short term demonstration projects." (interview , 7.6.02)

Second, the term 'waste minimisation' is used, as discussed in Appendix 3, to cover a whole range of matters, including water consumption, energy consumption, solid waste reduction, hazardous waste reduction, effluent reduction, and air pollution reduction, besides re-use (typically, waste exchanges) and also (and this was often significant amongst the claimed changes), recycling (Phillips, Pike et al, 2000:100). Phillips, Read et al. suggest that the largest savings were made in raw materials, with operating costs second and water consumption third (1999:242). Nor could they be called 'Beyond Compliance' initiatives, for there were a few instances of breaches of regulations by participant firms. Compliance was to be a poor relation in the records of these ecological-modernist inspired initiatives.

#### The character of the claims-making about the clubs

The final report of the Aire and Calder project, in 1994, reported actual savings of £3,350,000 for the 11 companies involved (47 per cent of these were from raw materials savings). These headline figures ensured wide dissemination of the results and encouraged others to run similar initiatives. This pattern of staggering claims about savings achieved, often from very simple new approaches costing very little to implement, has been a feature of the club reports that have followed; some of their specific characteristics are important for understanding the focus of much of the argument of this thesis, (besides underlying the choice of methodology) and for this reason these are noted here, before continuing the chronological narrative.

First, the dominant logic of what was asserted was not environmental, but economic. David Slater, Chief Inspector of HMIP, concluded his introduction to the first report on the Aire and Calder (Johnston 1994) using capital letters,

"most of all it has proved that POLLUTION PREVENTION PAYS."

Similarly, the Executive Summary of the Medway and Swale Club (Environment Agency, 1998:1) lists the first main achievement as the saving of £2,155,537, before detailing any reductions in polluting effluents. Nearly all the reports read for this thesis were structured so that the highlights were cost savings; in fact, many clubs were weak at recording environmental benefits (Waring, 2004). Some actually lauded changes creating worse resource efficiency from an environmental point of view: the Premier Project which operated for a short time in Park Royal, north west London (Premier Project 1997), gave publicity to savings into six-figures by a cosmetics firm following the discovery that their pots of face cream had been overfilled. Less could now be placed in the same size pots, thus creating proportionately more packaging waste per unit of output.

<sup>6</sup> By 1998 Read and Phillips were noting the use of the term 'Resource Efficiency' instead.

These were a set of initiatives reliant upon measurements to show improvements, yet the generality of claims-making about the set is subject to a formidable flaw - an absence of reliable quantified evidence from which to draw out implications. Much of this probably links to the lack of power of the central organization which supported the clubs<sup>7</sup>. The total numbers of clubs planned, run, successful or failed is not known; there was no requirement on clubs or firms within them to provide data, to use stipulated measures or parameters, to produce final reports or to notify *any* central agency about themselves. There was no mechanism requiring a central body to intervene to advise or even to collect data on what occurred once a club hit difficulties so there is little reliable evidence of the extent of failures and their causes - the assumption therefore in some overviews is that 'Best Practice' truly reigned. Within some participant firms, edginess by managers, and fear of competition, led to a reluctance for the details of some changes in processes to be divulged. Fear by club organisers that firms might back out, meant that checking on claims of savings was a delicate matter and rigorous assessment involving repeating measurements or even requiring that baseline measures were taken, was in many cases out of the question. Details of these evaluation issues are given below but here it is necessary for the argument to draw out three linked tendencies in particular. These are for the detail of how savings were made to be absent, for disparities in achievements between different firms to be obscured, and for the distinction between possibility and actuality to be fudged. These failings did not apply to all clubs - and of course, without a complete and reliable list it is impossible to say to what proportion they did apply.<sup>8</sup> The point being made is not so much that this lack of precision was avoidable, or regrettable, rather that it was *accepted*. Even some members of the academic community studying the projects seem to have regarded these practices as tedious but inevitable features of the projects, on occasion even providing substitute estimate numbers as if this was a normal and legitimate way to draw conclusions from an often vapid data set. From evidence of the case studies here, as well as from seminars, conferences and conversations with numerous people engaged in working on the clubs over several years, (i.e. wide-ranging and persuasive but not conclusive evidence) I judge that these approaches to setting out what was achieved were common; certainly some of the most senior people engaged in running clubs treated these difficulties as such.

The final reports published and widely available generally included tables setting out briefly the changes made and the resulting reductions in costs but without sufficient details for the ideas to be copied nor of exactly how the savings were calculated in the individual companies. Whilst some of the improvements were featured in detail in 'Best Practice Studies,' published by the ETBPP<sup>9</sup> there was a tacit acknowledgement that member firms were reluctant to release details partly because this might reduce the increased competitive advantage they had gained from membership (Phillips, Read et al, 1999:241). This was sometimes overt, as was found in one of the case studies in this thesis, where the consultant refused to set out more details of one saving, having a shrewd understanding that participant companies would not take kindly to their competitors obtaining the details. Another,

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<sup>7</sup> The creation of ETBPP is described below

<sup>8</sup> (Indeed the lack of reliable figures on total numbers, etc. makes it very difficult to state observed generalities in the usual terms such as 'normally', 'frequently', 'in the majority of cases', etc., for all rely on some kind of quantification.)

linked concern was acknowledged by John Gummer, when guest speaker at the Environment Council AGM in 1999: fears by managers of their previous inefficiency being exposed. The consultancies, too, might be reluctant to release details, for their income depended upon them displaying more expertise than was available in the client firm; if their know-how was readily available, they had less expertise to sell (see Barley and Kunda, 2004: Chapter 8). There was therefore a strange kind of sub-rationale deployed by the clubs; they were introduced to help industry in general - consistent with a neoclassical economic argument that firms merely needed information in order to effect changes - yet in practice it was relatively common for information gained in the clubs to be kept confidential to protect the participants who had received subsidised consultancy.

The claims made about the clubs overall rarely emphasised that the savings made were unequally distributed across participant firms and that not all might succeed; the use of "average savings per club" as a parameter tends to camouflage this. For example, in the first programme of the Hereford and Worcester Club, 3 companies out of around 40<sup>9</sup> accounted for 80 per cent of the £250,000 reported savings (Environment Agency, 1997b). In the first Leicester club, commonly considered the most successful ever run, the cost savings achieved over two years averaged out as 0.26 per cent of joint turnover, and the total considered achievable (see next paragraph) was 1.1 per cent of total turnover. Yet the savings ranged from 0.03 to 2.6 per cent (cited by Phillips, Read et al, 1999:233). Despite this, averages were cited. Following on from this success, claims were made that usually waste accounted for around 4 per cent of turnover and that by reducing waste at source many companies could convert 1 per cent of turnover into profit (cited by Henningsson et al, 2001: 325).

Often the tally of total ideas proposed to reduce resource usage was set out in the reports of the clubs, which was the case for Aire and Calder. (The potential savings were greater, of course, in the collections of proposed ideas than the actual savings recorded in the shorter lists of implemented measures.) Sometimes these suggested ideas were presented as if they, devoid of further action, represented real achievements; in some reports it is difficult to establish which of the proposed ideas were actually put into action, and the assumption seems to be that all were viable and consistent with other policies and values of the firms concerned and that all would be put into action eventually. Headline figures are described in a number of reports as 'identified savings', or 'identified further potential savings'. The report on the Sabina project, a club based around the Severn Estuary, for example, states in a delightfully obfuscatory way, in summarising its key achievements:

"During the course of the project, 200 waste minimisation opportunities have been identified. Of these, approximately 100 are feasible, with relatively few (20 per cent) requiring capital expenditure. More than 50 waste options have been implemented to date or are presently underway, with a further 30 due to start shortly. The total annual savings to date have been costed and currently stand at almost £3 million with £1.5 million of these savings having already been actioned" (WSP Environmental 1999:41).

In similar vein, the report of the second club to be run, Project Catalyst, states (at page 13, Table

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<sup>9</sup> There are discrepancies in the statements of the overall numbers of members.

3.5a) that 399 'opportunities' were identified (W.S. Atkins 1994). These were posted against annual savings of £8,906,951, and it was stated that 29 per cent of these, providing savings of £2,338,322, had already been implemented, and that within 4 further months 45 per cent of them would have been implemented, (Table 3.6a, also page 13) "realising 37 per cent of opportunity value", [i.e. £3,295,571] and implying that 98 per cent would be implemented (a pie chart shows 30 per cent of opportunities as being implemented in a time scale 'over 12 months'). Yet it also states that some had been assessed as unfeasible, and 152 ideas had not had a completed feasibility study: it was thus not known at the time of the report whether they were feasible or not. It is unclear how the 'savings' were calculated (especially in such levels of detail) if feasibility studies had not been done, nor how firms could make commitments to implement ideas without this. Nevertheless, the Executive Summary (page 5), states "The project has identified potential financial savings totalling £8.9m per year of which over £2.3m had been implemented before the end of the project, and a further £3.7m is due to be implemented within the next 12 months. Almost £2.5m of savings involved zero cost and almost £3m had a pay-back of less than 1 year." It was thus likely the overwhelming number of the opportunities already implemented were those costing nothing, and while the claimed savings are very remarkable, it suggests that there might well be a qualitative difference in securing implementation of opportunities requiring significant capital investment. Johnston and Stokes remark :

"Potential savings data must be regarded as at best unreliable. Many of the savings identified under this category were related to proposals which will never be undertaken, because of the capital expense or unavailability of solutions. In addition, the absence of accurate baseline data prior to the start of the project in many cases prevented meaningful estimates from being made." (1995:22)

A similar optimistic blurring occurred in the details of the Medway and Swale club on the Environment Agency website ([www.environment-agency.gov.uk/envinfo/waste/case1.htm](http://www.environment-agency.gov.uk/envinfo/waste/case1.htm) accessed at 9.6.99). This listed, not the figure of £2,155,537 achieved savings (cited above at p.32), (although a contact number was given to obtain the full report), but the sentence without qualification, "A total saving of over £3.7 million was identified." Of course, not all reports blurred this distinction, for example Project Bedivel (1999) was scrupulous in distinguishing outcomes of different types and payback periods.

The claims-making reviewed above can be usefully compared with the conservative assessment of the World Bank report on pollution prevention and cleaner production (1999:136-7) which reviewed the UNEP Cleaner Production Program, established in 1989. This gives estimates of how many audit ideas are likely to be taken up and what proportion of ideas which involve significant investments will be adopted. They found :

"Despite the increasing and often very focused promotional efforts, there is anecdotal evidence that the practical implementation of cleaner production recommendations fell short of the level anticipated in the early years of promotion, although it is believed that the situation is improving. There is no accepted way to measure the overall impact of Cleaner Production Programmes, but typical figures suggested by people in the field

indicate that 15-20 per cent of the identified measures were put into practice within a reasonable time after the completion of the audits or investigations. This figure is increasing as experience is gained in designing programs and overcoming barriers to implementation. For example, in focused, sustained programs, it appears to be possible to obtain implementation of 30-50 per cent of recommended measures, representing more or less the full set of no- or low-cost improvements."

In terms of environmental benefit, they found:

"As a rough guide, 20-30 per cent reduction in pollution can often be achieved with no capital investment and a further 20 per cent or more reduction can be obtained with investments that have a pay back time of only months."

If their findings were applicable to the UK, only a proportion of the ideas cited in the published reports would have been likely to have been implemented. (In fact, if their estimates of environmental benefit are reasonably accurate, perhaps a more defined message could have been given out, with advantage, by the environmental regulators?)

To summarise, the club approach - and it varied in practice over time - gave participating companies subsidies on the use of various types of consultancy and the chance to network and liaise with people facing similar problems. The evidence from club reports was often imprecise and there was no definitive source of data about the initiatives overall during the years of interest here. Questions arise as to whether institutional factors may have contributed to this manner of reporting on initiatives.

#### The Johnston and Stokes report on the early clubs

The wide dissemination of the success of Aire and Calder<sup>10</sup> was followed by a similar story concerning the second club, Project Catalyst, situated around the Mersey basin, with a wider focus including all kinds of wastes and effluents, solid, liquid and gaseous in its remit. A third club, the Leicester Waste Minimisation Initiative ran from 1994-95 (Kersey 1995) proved to be even more successful in terms of overall cost savings (but see qualifying remarks above at p. 34).

Yet there was evidence suggesting that many firms were unconvinced by the claims and few were adopting the new practices [as for example the survey cited in ENDS (1995b:7)]. CEST produced a detailed report (Johnston and Stokes, 1995), investigating the limited take-up of the club ideas and considering the motivation of the participants. They found that dissemination strategies were so undeveloped that many participants had not even passed the information gained to sister companies. Only two firms had independently asked for information on the projects, the overwhelming number of enquiries had been from universities and schools: they remarked (p.29) "this places doubt on the success of local projects in inspiring local business to action". The clubs' perceived main benefit was an acceleration of measures already in train in the firms concerned. The main drivers for participation

<sup>10</sup> Aire and Calder was unusual in that it formed the basis of several reports: an interim report (Johnston 1994); a report on motivation (Johnston and Stokes 1995) [paid for by BOC and also published by CEST]; a management guide (March 1995) a video (CEST 1995) [which also described a slightly later initiative, Project Catalyst] and a final report on 6 July 1995. The success of the project was also disseminated at conferences and seminars.

had been cost saving; environmental benefits were frequently not a result of the projects and where firms were concerned to improve their environmental performance, this was usually for public relations. The conditions within the participant firms were not conducive to bracing new ideas and innovations. The researchers found evidence of stressful levels of work, fear, lack of confidence, anxiety and concern - not that their firm was insufficiently competitive but that their UK-based competitors (not their overseas competitors) should be made *less* competitive. In the main, managers, already stretched, were shy of exposing themselves to additional forms of monitoring such as was offered by the new auditing systems of the clubs.

Faced with these complex needs, expectations and institutional factors, Johnston and Stokes made some wide-ranging observations and recommendations, and, as is often the case where there are many recommendations, most were never implemented and those that were did not reflect the arguments precisely. They called for further research and better follow-up and dissemination of information on waste minimisation techniques. Some of their recommendations for future projects were to be influential: calls for a team approach, assured support from senior management, external assessment, and a focus on production facilities with less than 100 employees. There was no general call to replicate the waste minimisation clubs on an *ad hoc* basis although there was a recommendation for 'clubs' comprised of companies in the same sector which were not direct competitors and for work in specific sectors - for example, construction and agriculture. The ideas of Johnston and Stokes were not followed closely; nor did the waste minimisation initiatives cease at this point, as they might have been if they were merely fulfilling the approved role of demonstrating that 'win win' was possible. Instead they began to proliferate; they did so under the encouragement of a new intermediary, a dedicated organisation run by a major consultancy with roots in government, which was entrusted by the relevant ministries with the role of developing and promoting voluntary adoption of waste minimisation approaches by industry.

#### The Environmental Technology Best Practice Programme

By 1994, both the Department for Trade and Industry (DTI) and Department of the Environment (DoE) had been engaged for some years in running programmes which were, like the clubs, designed to interface with business on a voluntary basis. Some also focused on demonstrating best practice; typically they deployed grant schemes and it was common for consultancies to operate them. All this was consistent with a dominant view at the time that an important role of government was to facilitate the operation of the market by assisting with problems of information failure: by providing resources which would give technical or other information to firms, the state could assist them in operating competitively, and might stimulate the diffusion of innovation. Examples of such schemes included the creation of the "*Biotechnology Means Business*" programme by the Biotechnology Directorate of the DTI, which ran a Helpline and Technical Support service as well as providing seminars and educational literature, and was headed by Jackie Wood of March Consulting; the creation of the Business Links to provide general business advice; and the Energy Efficiency Enquiries Bureau, run as part of the Energy Technology Support Unit, "ETSU". Many of the schemes had time-limited funding (three years being a common allocation), and not all made real headway. One example is an

earlier joint scheme between the DTI and DoE, the Environmental Technology Innovation Scheme, promoting innovative environmental technologies. This ran from 1990 to 1993 and closed with only 34 grants awarded (Hansard debates for 22 March 1994).

After the first waste management clubs the DTI came to a policy decision not to fund more (ENDS Report 1995a:20-21) for it was felt that the general case that “environmental sense was good business sense” had been made and this decision “led directly” (interview with Douglas Robertson of DTI, 7.6.02) to the creation of a new programme in 1994 which was to shape the development of the future clubs: this was the Environmental Technology Best Practice Programme. This awkward and lengthy name immediately gives a clue to the stance of those creating the programme. Whilst it set out the remit of the programme accurately, i.e. to demonstrate good practice to business firms, and was thus appropriate and proper for an adjunct of a government department, the clumsy and long-winded title was difficult for people to remember and may have hampered its effectiveness. Such a name demonstrates the lack of awareness of those leading the programme of the difficulties of engaging with businesses - for under the conditions of the time, they were unlikely to exert energy on environmental matters unless it was made easy for them. The precise but wordy name also suggests that the theoretical assumptions were that the main challenge was to provide industry with information and that managers, having seen the evidence about the methods used and the results, would themselves decide on a rational basis whether to adopt such changes or not. The initial assumption was that the firms would need no more assistance or encouragement to make changes than mere information and that simplicity or attractiveness of presentation did not matter (interview with Mike Walker of ETBPP, 23.4.1999)<sup>11</sup>. (In fact, in recognition of these difficulties, the name was changed in November 1999 to Envirowise and the programme relaunched.)<sup>12</sup>

The aim of the Programme, which was set up initially for 5 years with a budget of £5.7 million per annum (Pratt and Phillips 2000a:203) was to improve the competitiveness of firms by promoting cost effective types of waste minimisation and cleaner technology. It had a remit to focus on special areas where there was great potential for savings in costs and environmental impacts. Its activities included operating a free Environmental Helpline for businesses (later combined with a help line giving advice on reducing energy usage; this was receiving around 200 calls a week in the early years (Read et al, 1997:281) and over 600 by spring 1999 (interview with Mike Walker, 23.4.1999). It provided specialist sectoral support in waste minimisation, and to smaller companies (as defined) some free consultancy help, and published numerous case studies and best practice guides for all sectors. The accent on improving profitability was underlined by the requirement for it to save industry £320 million per year by 2015 (Pratt et al, 2000:203). Crucially, here, one of its roles was to provide support and guidance for waste minimisation clubs.

The organization which won the contract, and took on the name ETBPP, was therefore tasked by the

<sup>11</sup> This was the reported perception of the policy intent.

<sup>12</sup> Details about the contracts for the programme are described in Chapter 6.

two government departments with bringing about voluntary change on their behalf; in effect they assigned it a task of changing norms, an endeavour more commonly approached by means of legislation and effected by regulators or police. The programme was deliberately run by a private organization, not part of government, for this was considered more acceptable to business. Its function was described in "*Making Waste Work*" (1995:31) as

"both to promote waste reduction and to monitor the provision of other guidance on this topic elsewhere in the public sector and by private sector bodies."

This put ETBPP in a very weak position vis-a-vis potential participant firms (it was set up to promote good practice, not to fund it, and so could offer few inducements) and yet in a strong position vis-a-vis other advice-giving bodies, including the regulatory bodies. It encouraged the programme staff not only to develop links with other intermediaries which were providing advice to business on good environmental practice, such as trade associations, consultancies, and Business Links, but also gave them the potential to influence both the kinds of advice given and the policies of the organizations which gave it. Further, the contract to run the programme was set up in such a way that besides monitoring the Programme and other intermediaries, to a significant extent the monitoring of its own results was left to its own organization. The measure of its success was set simply as achievement of a stipulated ratio between the resulting savings to British industry and the costs of the Programme (interview with Robert Lowson of DEFRA, 18.5.05). Yet no powers were devolved upon it to assist in the collection of evidence or to require records be made of what occurred, nor, because it did not formally fund initiatives to any extent<sup>13</sup> - that money came from separate grants from different grant providers - did it have any great leverage in targeting the projects that occurred. This quasi-regulatory capacity, with none of the usual regulatory powers, nor fiscal influence, was to have considerable impact on the governance and operation of the projects.

The overall impact of the initial programme was calculated by ETBPP and presented in terms of savings to UK industry. It was considered very successful. Phillips, Pike, et al reported that by 1997 ETBPP had achieved an estimated saving of £28 million per annum, including a reduction of solid waste across the UK of 131,000 tonnes per annum (2000:7). By August 1999 the Programme had achieved savings of £50 million in total (Pratt and Phillips 200a:203). '*A Way with Waste*' gave the annual savings (of the Environmental Technology and Construction Best Practice Programmes, together with the Energy Efficiency Best Practice Programme (note that construction waste is very heavy, but cheap to dispose of) as £650 million in energy and £50 million in the costs of waste (see DETR 1999a, Part One:22).

It is known that many clubs began in the latter half of the 1990s but as there was no mechanism requiring records to be kept, it is difficult to be confident of the numbers that ran. One of the most authoritative sources is likely to be Steve Waring, who was a senior member of the ETBPP team for its first 5 years, and then worked on both the 2000 and 2004 surveys of the clubs for Envirowise as a private consultant. Whilst both reports were kept confidential, some evidence from them appeared in

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<sup>13</sup> (Interview with Mike Walker of ETBPP).

Envirowise magazines and he presented an overview of the findings at a national seminar (Waring, 2004). He recorded 25 clubs starting up each year from 1997-2000 before a steep drop in 2000, (as Landfill Tax Credit funding fell away), falling to no new starts in 2003<sup>14</sup>.

There is considerable variability in estimates of starts and total numbers run, even in figures cited within Envirowise publications. The ETBPP/Envirowise magazines tended to publish lists of clubs with maps showing the coverage across the UK. “*Club News*” of November 1997 lists 50 ‘existing or proposed’. In May 1999 it lists 59 ‘active’ with 16 proposed and 11 ‘with no current activity’. Interestingly, these figures are not set out, instead the display shows a list of 86 numbered clubs printed in different typefaces and the reader must add up the numbers in each category (a cursory glance leaves the impression that there are 86 which are active). In similar fashion, the May 2000 issue lists 74 ‘active’, 15 proposed and 33 ‘with no current activity’ and records this as a 20 per cent increase in the previous six months (cited by Henningsson et al. 2001:326). “*Update*”, the Envirowise newsletter, of November 2000 (the time of the launch of the new name *Envirowise*) lists 125 “active clubs” with 3029 member companies. “*Club News*” of October 2001 records 80 active, 14 proposed and 45 ‘closed club or with no current activity’. The estimate from the 2000 survey for Envirowise was that around 80, with a maximum of 85, had run in total since 1992, 41 of which recorded savings. Yet in summarising the 2004 survey for Envirowise, Waring estimated that up to that point there had been a grand total of 94 ‘possible’ clubs, 28 of which had recorded savings [the discrepancy with his earlier estimate was not explained] (both reported in Waring 2004). There were estimates too from the Environment Agency survey: Chris Radway of ENTEC, who was carrying out this work had found evidence suggesting over 100 in March 2004, but when asked for more precise figures referred me to Steve Waring, remarking,

“this sounds the sort of statistic that would be difficult to get. It may be only an approximate semi-quantitative figure.”

### The proliferation of the clubs in the late 1990s

Whatever the exact numbers, within 5 years of the first initiative, it could be claimed<sup>15</sup> that waste minimisation clubs had become expected components of strategies to promote sustainable waste management and greening by industry (Read, Phillips et al, 1997). In institutional terms this surely equated to an assertion that they had become legitimating symbols of these values.

This enthusiasm for repeating the clubs appears paradoxical and gives rise to a number of questions. The first few projects had provided sufficiently good evidence for the DTI to conclude they need sponsor no more. The case, it would seem, had been made already, and made strongly. It was accepted that benefits could be expected for firms in the initiatives, while the evidence from the

<sup>14</sup> These figures are from notes taken of bar chart slides at that presentation; the figure for 1999 was slightly higher and is estimated at 26. The Envirowise website in July 2001 suggests a gradual build up and earlier peak, in 1998, then dropping to 26 in 1999 and 16 in 2000, and this is supported by observations by Phillips, Read et al. (1999:236) of the difficulties of getting external funding at that time.

<sup>15</sup> (on the basis of a survey of county council activities and intentions)

Johnston and Stokes' study suggested that diffusion to other firms was poor. If the primary rationale for running a programme (and whilst theoretically interesting, and important symbolically to the departments, these were tiny initiatives) was that it would influence other firms to make the necessary changes and investments to achieve similar benefits, it is hard to understand why *local* examples in the same mode were necessary to prompt changes to (presumed) rational decision-making processes, especially if there was not to be a new emphasis on spreading the practices more widely. Nor is it clear why efforts went into repetition and not on working with groups of targeted firms, such as those producing particularly troublesome wastes. The clubs were expensive as public initiatives (and remained too expensive, even in their later forms, for all companies to benefit at first hand). They depended, very largely, on the availability of grants (Phillips, Read et al. 1999:240-1). With no central direction, and with funding, where it was available, coming from a range of sources and for different purposes, there could be no wide scale targeting of old or inefficient industries or areas with few waste disposal facilities. In some parts of the country, on a local level, it seemed that the clubs became to a large extent ends in themselves. As will be shown, the approach became such a necessary marker for supporting improved resource efficiency that club involvement became a focus for contention in some organizations. The next section suggests some of the reasons for their appeal at local level, and the opportunities they provided for certain organizations.

During the latter half of the 1990s, whilst there were concerns that fewer materials should be discarded as waste, there was no decisive policy, merely a succession of draft policy documents (for most options were unpopular, costly or both) and a formal policy did not emerge until 2000 (see Appendix 5). This indecision as to overarching policy was considerably disguised, however, by the titles of the draft documents<sup>16</sup>, the manner in which they were introduced (which included the pre-publication news articles, press releases, interviews, seminars for the trade, formal documents to be studied, etc. which created anticipation appropriate to a finalised policy). During the period there was a steady stream of modifications and improvements to existing modes of dealing with already-wasted materials, including major regulatory changes such as the introduction of the new Environment Agencies in 1995, (given a remit in regard to waste minimisation as part of their duty to work towards sustainable development), the introduction of the Landfill Tax in 1996, and changes in modes of monitoring and licensing of waste management sites. The documents produced did indicate concern about the need for waste minimisation (e.g. DETR 1995, 1998a) though this was not matched by effective large-scale action, as evinced by the critical statements of the House of Commons, Environment, Transport and Regional Affairs Committee in their report into Sustainable Waste Management in 1998. The documents also included, as evidence that helpful activity on waste minimisation had already begun, enthusiastic mention of the work of the ETBPP, and of the success of waste minimisation clubs.

Within these circumstances of repeated changes to operational systems, and repetitive hype that new policies were to be issued presently (which would bring, it was anticipated in each instance, a final clarity about the proportions of waste going to incineration, the assistance for waste minimisation,

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<sup>16</sup> (In some cases their draft nature was only apparent after careful scrutiny of the prelims.)

recycling, etc.), and increasing awareness that actions should be taken to reduce waste, those at local level looked to ways of assisting this, or at least demonstrating engagement with the issue. This was also a time when local authorities were being encouraged to align themselves with the concerns of business, and of increased availability of grant for environmental purposes, not least from the Landfill Tax. There were not many pre-existing models of what might be done at local level that was workable. The repertoire available (in the terms of Tilly 1979) was dominated by the waste minimisation clubs. They began to multiply. This section of the chapter considers the extent of this expansion and the ways in which local arrangements, links, hopes, expectations and ways of operating helped to create the haphazard and unfocused geographic spread of the clubs, with many local initiatives investigating essentially the same problems providing a repetition of claims of success, yet without a means of central - or even local, in some cases - scrutiny of what occurred.

Firstly, the clubs, straddling business and environment, reflected aspirations in the agendas of numerous organizations. For larger institutions, sponsoring a local club helped them demonstrate their forward-looking and "green" credentials, and their commitment to improved business efficiency at comparatively little cost<sup>17</sup> and very little apparent risk. For organizations with designated partnership officers, such projects were admirable uses of their time, for the typical club aims fitted with many agendas, allowing them, for each hour spent working on a club, to "multiple score", recording that unit of time more than once, as spent on a number of priority matters. Also, it was the conventional wisdom for some that projects, if successfully carried out, and with aims which were lauded by current strategies, were a potential basis for career advancement.

Secondly, the kinds of messages given out of stunning results for some participants led to a ready engagement with the potential of the approach. It has to be said that there is a tendency for those involved in even moderately successful clubs (myself included), to be extraordinarily impressed with some of the ideas and commitment shown and the exciting possibilities raised. Many people saw the initiatives as the beginning of a significant sea change and wanted to be part of it. Because such amazing sums were reported as saved, the published reports, lacking the counterweight of the outcomes of less successful clubs<sup>18</sup>, give the impression of a reliable method which, when applied, carried with it the assurance of success from use of a definitive method. This was misleading: Phillips, Pike et al (1999:101) observed that

"a significant number ... have ceased to function before their planned closure date and have not produced a final report of any substance. In other cases, the apparent reductions in waste arising have been very disappointing indeed, with little data placed in the public domain. While the Best Practice from the successful clubs has been widely publicised, it is apparent that there is no national strategy to assimilate the lessons from those that have failed so that new ones can plan effectively. "

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<sup>17</sup> (generally a comparatively small donation and the time of a staff member for a few hours a month)

<sup>18</sup> (These researches have found no reports of failure from those attempting to set up clubs and who had failed to do so, nor published reports of clubs which had failed to fulfil their main aims.)

The bad news was not publicised. In some ways it was inconvenient knowledge. Those who did not have good experiences of the clubs had little interest and possibly good political reasons, (for a failed project had career-diminishing potential for the individuals concerned), for not advertising the fact. Similarly firms which had joined clubs but failed to benefit proportionate to the time or money invested, tended not to announce that it had not been good for them. In contrast, the ETBPP were charged with taking such initiatives forward and gave tremendous support and publicity to the standard, process-mapping based approach. Their style of dissemination, with official-looking handbooks and government backing, carried implied confidence that the clubs were a safe bet. Elsbach (1994) points out how organizations may engage in symbolic management by use of accounts to manage perceptions of organizational legitimacy, and here we can also see the use of the 'vocabulary of profits as languages of organizational motive' (Ogden, 1995:193).

For organizations trying to promulgate ideas of greening of business, their task was made easier by being able to quote the wonderful financial savings. For locally-based environmental regulators, if staff time was available, there were also potential benefits: delivering training might, for example, reduce the risk of accidental pollution incidents. For most inspectors in regulatory agencies, the previous need had been to display technical skill, dependable responses and careful paperwork in the face of continual ongoing series of inspections, interspersed by various complaints or pollution incidents. This new type of work (with which a minority of staff became involved) was challenging; there was not the dreary and continual stress of dealing with complainants where proffered solutions might not be entirely satisfactory. The picture across the whole regulatory organization was more complex than this, however, and the many facets of that situation are addressed below.

The clubs offered local authorities a means of demonstrating commitment to actions at the top of the waste hierarchy, at comparatively little cost or organizational disruption (as might occur if they had a change of culture), while simultaneously developing friendly contacts with business, especially the small business sector, and gaining good publicity. The club's characteristics were consistent with certain explicit regional strategies for business (Pratt and Phillips 2000a:207). Similarly, the idea of using public money proactively to prevent pollution was very attractive to a number of environmental organizations, some of which became involved (for example the Women's Environmental Network in the first case study club).

For all these reasons, the waste minimisation clubs became a common and fairly safe option for many intermediaries involved with greening of business. Conversely, for many firms, the clubs held much less attraction<sup>19</sup>. This is for a number of reasons. The first relate to distrust, for culturally many businesses keep their distance from bodies such as regulators and local government, and many were wary of paying consultants (Johnston and Stokes, 1995:15). Whilst the clubs made claims of cost savings, most firms across all sectors of industry very frequently receive flyers claiming to bring

<sup>19</sup> The motivations for firms to participate have been explored comprehensively in Johnston and Stokes, 1995; they would also have included the benefits from building legitimacy by involvement in publicly recognised external gatherings (Galaskiewicz 1991).

financial and other benefits for a small outlay; many tend, routinely, to dismiss such claims. Another reason was a perception that the benefits would be negligible. Because waste disposal was perceived as the only cost of waste by many managers and linked to the fact that those most aware of waste budgets tended to have very low status in organizations (Activity Based Costing is rare in UK firms), there was little incentive to focus on these costs rather than on other problems. Also, it is likely that many small and medium sized companies in city locations at this time had negligible waste costs (interview with Cathy Bobbett of Business Link London City Partners, 15.11.99). Some firms perceived themselves as already frugal in their use of energy and materials, so there was no recognition of the value of the process-based efficiencies which might be implemented. Firms in high technology sectors, or firms providing materials or products to only a very small number of customers, and already working to demanding and restrictive standards might have little room for manoeuvre in making changes. The fragmentation of advisory roles across numerous organizations at the local level, without central coordination, was not only confusing to firms, it could result in scant provision of assistance in some areas and an oversupply (which might be just as unhelpful) a few miles away. Also, most clubs could only be joined at the recruiting stage. These factors made it very difficult for intermediaries to interest firms in the clubs. Paul Barker, of Business Link, who has been heavily involved in the clubs in the East Midlands, remarked at a seminar:

“It’s easy to say ‘get companies involved’, it’s no easy matter!” (10.10.01)

Even when firms attended introductory meetings, there was no certainty that they would go on to take part. Some of the club meetings were perceived as badly planned and providing insufficient ‘novel’ training (i.e. they purported to teach people what they knew already) (Phillips, Read et al, 1999:226) and these and other factors contributed to the failure of many clubs to start up; Phillips, Pike et al (2000:13) cite a ratio of proposed clubs to clubs starting up of 6:1.

This thesis will go on to argue that for the intermediary organizations which could run initiatives, work on them or manage them, the model was an especially attractive one to repeat. Established consultants could gain from economies of scale and security of employment over a significant period; less experienced consultancies could use the clubs to gain valuable and varied experience; for both, as the number of clubs grew, there was a continuing source of work in an area where expertise could strengthen. In fact, Phillips, Read et al. note in passing that

“it could be argued that the introduction of such clubs into the UK came about because service providers sought to create new markets when environmental issues were becoming increasingly prominent in the UK.” (1999:241)

The two government departments, whilst they had stopped direct funding of clubs, certainly welcomed local delivery mechanisms on the grounds that small firms were more likely to engage with local networks of intermediaries than with national trade associations, so that local initiatives would carry more weight with them. A second, more interesting reason for their approval, was that the networking between the intermediaries was *itself* considered beneficial because it assisted the process of *those* organizations committing to greening of business as an aim.

“... I think that it is rather positive for us that other support organizations are seeing

environmental good practice as worth pursuing, and if it means that by doing this, supporting a club like this, they can actually do something practical and worthwhile, then it helps gain their longer term commitment ..." (Douglas Robinson, DTI, 7.6.02).

### Review of previous evaluations and assessments of the initiatives

The previous sections of this chapter have explained the introduction and operation of the clubs, the factors contributing to their perceived success and the involvement of intermediaries in this. The last part, which precedes the main literature review, considers previous studies of the initiatives and discusses their limitations.

Evaluation has been defined by Weiss (1972:4) as the systematic assessment of the operation and/or the outcomes of a programme or policy, compared to a set of explicit or implicit standards, as a means of contributing to the improvement of the programme or policy. It is therefore likely to comprise a review of how a (single) programme or policy has been conducted, how well it is meeting the purposes for which it was established, a consideration of which groups have benefited from the programme and its estimated net effect, compared to the situation which might have existed if the programme had not been run. Assessment is considered here as a somewhat looser term, spanning both formal evaluations if any exist, as well as reports, summaries of what has occurred by a particular date, feedback by individuals, etc. For the waste minimisation clubs, assessment could relate to different levels of activity: it might be of outcomes at a single site or company, a single club, specified set(s) of clubs, or of the overall policy which led to the clubs. In the UK, besides a considerable number at the level of the individual club, there have been more general overviews, for example, Henningsson, 2001, Henningsson, Pratt, Phillips and Hyde, 2001, Pratt and Phillips 2000(a) and 2000(b) and some studies have been originated by Envirowise and the Environment Agency.

The first thing that should be said about the evaluations and assessments that have been done of the waste minimisation clubs, is that most of them come from the same stable. The vast majority of the academic papers about waste minimisation clubs have been written jointly by Professor Paul Phillips, his colleagues at University College Northampton and their associates who have worked jointly on papers with them. This in itself is significant, for a study considering the institutional context of the clubs. Their unit, in the Environmental Science Department of a university college in a relatively deprived area of the East Midlands, has been staunchly partisan in developing clubs, seeing them as an indispensable part of any policy designed to minimise waste of resources. This group has been responsible for copious studies of their work in developing and improving the methods used in the clubs. In the years 1997-2001, for example, Paul Phillips and his associates published over 27 journal articles and conference papers, besides a book, and there were 18 waste minimisation or resource efficiency projects in Northamptonshire, involving over £650,000 worth of funding and with club

memberships totalling 303 organizations.<sup>20</sup> Whilst Paul Phillips appears to be the most successful academic in this, he is not alone. Other universities, most of them new, were involved in running and writing reports about the clubs. Examples included Cranfield, Guildhall, Hertfordshire, Imperial College, Lincoln, Middlesex, Northumbria, and UEA. In some cases, the departments which became involved had suffered cutbacks in funding. For example, at Guildhall, the environmental science department had been closed and the staff redeployed in a unit which worked predominantly as a consultancy, setting up a series of projects (which included two major waste minimisation clubs), and obtaining grants to do so.

Given that so many of the studies and reports in the UK stem from one source, it is helpful to examine an early evaluation of the Dutch waste minimisation clubs (De Bruijn et al. 1996), which, even though it deploys a different methodology to that typically used in the UK, draws out many of the same features and concerns. It is discussed here in some detail. (Unfortunately, a few of their potentially very interesting findings were not expressed in clear English, and so one cannot understand very well what they meant, nor draw clear conclusions from their remarks on these points.)

#### The Dutch evaluation of their early clubs

This evaluation, paid for by the Dutch Ministry of Housing, Physical Planning and Environment, was carried out in 1994 by the Waste Matter Board of the Centre for Clean Technology and Environmental Policy of the University of Twente. Its task was to examine which features of the projects determined whether and to what extent they were effective and efficient. The Ministry also required details of the costs, and the potential for participants to continue the activities after the project was over. The project team investigated 44 firms from 24 projects (most of which used the methods of the original PRISMA Club), using a matched group of 15 firms as a control. The team involved appears to have included local authorities, environmental NGOs and trade associations as well as the university engineers; it is not clear whether local environmental regulators were involved.

They used a 'structured case-comparative study', undertaking structured interviews with those delivering the project and with champions in the participating firms, and content analysis of documents, reports, etc. Control firms seem to have been matched with similar firms which belonged to the initiatives, as regards sector [the term used is 'branch'] and size, and checks were made on what work each of the firms had done in regard to reducing effluents before the initiatives began. It was unclear which officials from the firms were asked the questions. A theoretical model was developed (based on earlier reports and evidence from stakeholders) which employed 62 variables. These were factors, some related to features of the project, some related to features of the firm, and others relating to the environment of the firm, which they posited as possibly having influenced the implementation phase and the continuing effects of the projects. They also considered the 'skill-levels' of the managers concerned, making considerable use of self-reporting by the managers to do this.

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<sup>20</sup> Some firms attended more than one club, for the Northampton team encouraged long-term involvement to ensure that firms continued to raise their standards.

Looking at the costs from the public purse, they found that the average price per participant firm was approximately U.S.\$26,900, with a huge range from U.S.\$4,500-\$187,500. On average, each of the Dutch firms surveyed was given 23 suggested pollution prevention options, of which 7 were taken up. The average cost per proposed option was cited as just over U.S.\$1,110, with the average cost per implemented option as U.S.\$4,018<sup>21</sup>. The evaluators questioned whether the average cost per participant firm was reasonable: if the daily rate for consultancy was U.S.\$875, the total cost per firm was of the order of 30 days' consultancy. Further, whilst the cost per proposed option was not considered excessive, there was "suspicion that the average price per proposed option was reduced by [inclusion of] unworkable options." (de Bruijn et al, 1996:48) Some firms still intended to implement further options at the time of the interviews, and when and if this was done, it was considered that the cost per implemented option would fall to U.S.\$1,781. This type of analysis of costs across several clubs, and comparing implemented and suggested savings, has not been done so rigorously by the UK studies, although the findings are rather typical of the earlier British clubs, when consultancy and other project costs were significantly higher than was the case three or four years later.

As with the British experience, it was difficult to recruit very small firms: the average firm size was 160 employees and only 10 per cent had fewer than 25 employees. There was also a shortage of data: either measurements and calculations had not been taken or, where they had, different criteria had been used e.g. some firms used pay back time, some annual savings, etc., obviating cross comparison. They concluded

"the firms could not indicate concretely what the level of financial costs was and the benefits of the measures taken" (p.51)

Faced with this problem, the evaluators asked instead for subjective opinions about costs and benefits: 68 per cent of participants believed there had been positive financial benefits and 20 per cent felt that there had been a net disbenefit in financial terms. The report does not explain how, if this was the case, the headline figures on savings were obtained in a way which was reliable. (This type of problem of non-comparability of figures, or of firms not explaining clearly how they had derived the figures which were the basis of their claims, was also found in the case studies.)

After the end of the project, over half the project firms reported that they had continued to carry out 'research' into reducing waste, (presumably this means investigations and audits) and 70 per cent claimed they had continued to generate new options for making savings. By correlating the data, the evaluators concluded that where the project managers kept in contact with the firm on a fairly regular basis after the project closed, the firm was much more likely to continue with such work (although the participants did not believe this to be a factor). Several of the Dutch firms had in fact participated in related projects previously and this was to prove the case with later UK initiatives.

Interestingly, the Dutch used a concept of the 'fundamentality of the generated and implemented

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<sup>21</sup> (these are as reported in the research paper).

options' to sift the results (1996:46). They looked at three indicators of this: first, the kinds of considerations which acted as the main criteria for selection of options for implementation. Overwhelmingly, these were feasibility and business or economic criteria. They also divided the changes made into product changes, technical changes (this presumably means process changes) and good housekeeping changes, and found that 'good housekeeping' (often quite trivial matters) accounted for 50 per cent of changes in the project firms. They also looked at indicators that pollution prevention had been incorporated into the organization of the firm. The Dutch report appears to indicate (again the English is imprecise) that some of the firms had previously taken action to improve their environmental performance<sup>22</sup>; and that the *later* changes instigated were more fundamental in nature than the earlier ones.

The matching exercise indicated that the main differences for firms that had participated in the projects were that they generated and implemented more prevention options than the controls, and attributed this activity to membership of the projects. A significant number also considered that the project had enabled them to understand the processes whereby waste flows and emissions were produced. On the debit side, their respondents indicated some concerns about the level of expertise of the project staff, and the quality of communication with the project teams. Some, in particular, criticised the information given prior to the projects which did not enable them to assess the consequences of participation. This again was to feature in the UK reviews of clubs.

#### Evaluations and assessments of the waste minimisation clubs in the UK

Before considering these evaluations, it is important to emphasise two factors - first, the remarkable achievements. Whilst several observers have concerns about lack of evidence or claims-making, it is a central feature of the reported clubs that some firms saved extraordinary amounts of money. The Dee Catchment Waste Minimisation Project report, to take just one example, records that the 13 companies achieved in total, savings of £4.55 millions per annum and reduced waste to landfill by 130,000 tonnes, water consumption by 600,000 cubic metres and energy savings of 35,000 MWh (CEST, 1997). The concern of the evaluator is for accuracy and the quality of the evidence; for the practical person, the results quoted often speak for themselves.

The second factor is the great difficulties for evaluators presented by the variable and uncoordinated way that the clubs were run. During the years of interest here (1997-2001) there were no agreed national requirements on the form that any assessment or report should take, nor on the parameters to be measured. Typically, the clubs were partnership projects set up by several stakeholders to meet a grant-giver's criteria, so that they often had numerous aims, not all of which could be prioritised. The participant firms were volunteers in a situation where it was often difficult to recruit, so could not be seen as typical of the general population of firms. Even where firms were from the same industry, the

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<sup>22</sup> They say of larger firms "Often these firms were also a bit further advanced with the introduction of environmental care within their firm" (p.51)

small number of firms in each club makes it difficult to extrapolate from their experience to larger populations. Evaluation of the clubs as a set of projects was hampered because the form of the projects changed over time (Phillips, Pike et al, 2000:99). Further, the diversity of firms involved and the relatively small number of volunteers made choosing comparison groups problematic. Evaluation is expensive, and many projects were relatively poorly funded. Many firms were reluctant to take baseline measurements (interview with Eleanor Morris of Envirowise 11.5.04) or shy of revealing the details of changes made (interview with Jez Cutler of the LEC, 21.10.99), so that evaluations could only be perfunctory. Often reports were vague, for example, on how long savings might be expected to continue (Pratt and Phillips, 2000a:214). The next sections explore the sources of secondary evidence available for evaluators and the extent to which their characteristics and availability created difficulties.

In the UK nearly all of the written evidence about the activities of the clubs comes from 4 sources: ETBPP/Envirowise; individual club reports; research from commissioned consultancies, and from higher education establishments (both commonly produced by practitioners or their colleagues). The evidence was in a variety of forms: club reports, ETBPP/Envirowise technical papers and best practice guides (the most easily sourced evidence of the clubs' achievements), leaflets, advertisements, short magazine articles, web pages; academic papers considering one or more clubs and commissioned reports. Two evaluation studies have been commissioned by Envirowise, besides a study regarding the marketing strategy for the clubs. These have not been published, although material based on them has been published in "*Club News*" magazine. In addition the Environment Agency commissioned an evaluation of the clubs and their achievements from consultants ENTEC which was completed in 2004. This report, too, has been kept confidential, although material from all these researches was used in presentations by the authors at a stakeholders' workshop in Birmingham in March 2004 (ENTECA 2004). The next paragraphs consider the various types of published materials about the clubs, considering first printed reports, magazine articles and website data stemming from ETBPP/Envirowise, second, individual club reports, third, reported findings from consultant-produced overviews and finally the academic literature based on evaluations and assessments.

ETBPP/Envirowise reports and guides which feature waste minimisation clubs are generally technical in nature and many are written with regard to particular processes in specific sectors. Examples include: CH115 "*Engineering Process Optimised to Reduce Scrap Metal: a case history from the West Midlands Waste Minimisation Project*", CH65 "*Statistical Process Control Saves Money: a case history from the Humber Forum Waste Minimisation Project*" and CH75, "*Packaging Redesign Increases Profits and Efficiency: a case history from the Thames Valley Waste Minimisation Project*". These are brief, typically consisting of a full-colour double-sided A-4 sheet with illustrations and bullet points to emphasise key matters. They focus on changes and cost savings. For example, the Scrap Metal case history above relates to a company producing golf clubs. It describes the 'cold drawing' method by which this is done in 109 words, and states that this was found to be the process giving rise to most scrap metal waste (when 'tags' are produced). The method of ameliorating this is described briefly, in a way which is technical, but not particularly revealing:

“The waste minimisation team examined ways of optimising the draw pass route to minimise the tag size, the number of tags and the length of the offcuts produced. The potential benefits of a number of process changes were examined and promising ideas taken forward for detailed consideration.”

There is then a summary about the cost savings:

“Implementation of the most suitable waste minimisation options resulted in a reduction in scrap metal waste of 64 tonnes/year. This represents a cost saving of £50,000/year due to reduced raw material costs. This saving was achieved without the need to invest in new equipment.”

Envirowise also produces magazines, besides leaflets and advertisements for its services. Overview articles focused heavily on the financial savings made by companies during clubs operating periods, or shortly after; there is less data on environmental benefits. Envirowise “*Club News*” of October 2001 is typical; it carries a front page story about the Gloucestershire Waste Minimisation Club, quoting participants, for example:

‘ “We saved £8,000 a year after the first meeting,” says Malcolm Hill, from API Coated Products in Cheltenham’ and

‘Ron Tyler from Helipebs Ltd in Gloucester said: “I tell the sales staff that they need to sell £100,000 of product to meet every £10,000 I save through waste minimisation.” ’

The Envirowise publications also featured claims about the returns possible to firms from involvement with the clubs and/or waste minimisation generally, for example, from the ETBPP guide “*Waste Minimisation: Elements for Success*”:

“Waste Minimisation will save you money - typically up to 1 per cent of business turnover, either as extra profit or as reduced operating costs.”

And “Save £1,000 per employee per year” in an advertisement for the Envirowise guide on Resource Efficiency, produced in Envirowise “*Update*”, October 2001. Thus remarkable and commendable changes were announced and applauded whilst giving few details for others to copy or for evaluators to categorise, and were accompanied in some of the materials by rather simplistic and optimistic claims-making. (Some of the academic papers considered whether it was possible to estimate potential savings arising from involvement with the clubs [paralleling recycling debates on percentage return possible]. For example, Phillips, Read et al. (1999:242-3) found a wide divergence of performance achievements by firms even within clubs which were considered successful. They concluded that cost savings could not be predicted from turnover’, nor company size, as the results for individual firms depended on a number of factors, ‘including the extent of previous initiatives to reduce waste’.) ETBPP/Envirowise has always operated in a climate where there was both an expectation of, and a ready welcoming of success; their contract with DTI and DoE is likely to have resulted in pressure to have ‘good news stories’. Significant benefits from successful claims-making would have been likely to have been the case for all such intermediary bodies charged with taking forward voluntary approaches with industry (and for a significant number of other industry groups besides). The firm that won the contract had a strong scientific and technical core and a culture of the

inculcation of the expectation of success in this way is therefore considered unusual. It may be associated with the fact that ETBPP had no recording system for clubs that have been set up and failed to operate<sup>23</sup>, or that closed early, so that those writing these articles had no reason to doubt the general climate which was created by the many successful and wonderful claims.

One considerable source of difficulty for researchers was that the main source of information on club existence, duration and contacts was given on the Envirowise website. A map of clubs across the country provided a central feature of the web pages; to see the details it was necessary to click separately first on the region and then on the specific club. They were accessed for this thesis over several weeks in the late spring and summer of 2001 and it was found that the listings were subject to a number of inaccuracies. Some clubs were listed as active which had closed: for example, the Bedivel club was listed as operating from 10.01.98 and closing on 31.12.99 but was given as 'active' (accessed 14.05.01). Other such examples were the Huyton club, the Bury Club, Empress, Hammersmith and Fulham, and Crewe and Nantwich. A proportion of the telephone numbers given did not link to the named contacts. That many of these clubs listed did not then exist was a matter of profound mystery to enquirers and created great difficulties for quantitative research efforts<sup>24</sup>. It is part of the task of this thesis to consider to what extent institutional factors help to explain these gaps in the data.

There are difficulties for evaluators in drawing conclusions from the set of club reports available. The total number of club initiatives run during the years of interest is not known and only a subset of clubs produced final reports of any kind, so that there is little secondary evidence about many of the clubs believed to have run. Further, as the members of the subset producing reports may well have had different characteristics to the general set of clubs, it is difficult to draw valid inferences for the whole from this subset. To further complicate factors, assertions on the Envirowise website that clubs had produced reports were not always accurate<sup>25</sup> and only a further subset were made widely available to researchers. Paul Phillips' remark about this, made at a seminar reviewing the work of the clubs, captures his despair and also something of the way in which many of the people involved regarded the initiatives as crucially important:

"Most of the clubs mentioned by Envirowise have not come out with a final report which is a national scandal." (seminar, 1.10.2001, University College Northampton)

As has been the case for other researchers, only a small number of reports (15) for individual clubs were obtainable for this study (see Appendix 4). They may have been atypical (as better run and better financed than average) for all claimed success, and it is known that numbers of clubs operated closed prematurely or, clubs proposed never opened, and not all had sufficient funding to produce a report. Because they may be atypical, only a brief overview of their characteristics is given here.

<sup>23</sup> It is, of course, difficult to specify what might constitute 'failure' in a waste minimisation club as the projects were subject to a number of different aims, especially where there were many partners.

<sup>24</sup> In a telephone conversation (9.1.2004), Steve Waring, then working as a private consultant, explained that a number of inaccuracies had been discovered on the website about clubs and he had been given the task of checking and updating it.

<sup>25</sup> It is possible that those engaged in the clubs may have asserted that they were to produce reports and in editing down this was construed as having happened, where it was not done.

They vary in precision and length and are generally upbeat, with dramatic, impressive claims of financial benefits. Attitudes to payback are exemplified in this example from the final report concerning Aire and Calder:

“Companies will, and should, opt for the easy and most cost effective options first. Having achieved all they can by picking this ‘low hanging fruit’ management will then have greater confidence to invest more effort and capital in those measures which are likely to show a longer payback. It is, however, accepted that a greater willingness to invest in measures with longer paybacks has yet to materialise.” (Johnston, 1995:7)

Sometimes many salient features are omitted from reports: these include the names of firms (e.g. Wellingborough - Clarkson and Adams 2001), how they were chosen, how it was some saved money, and which firms did not, whether the reported changes were apparent as trends beforehand or not, how the savings were calculated, how long the savings continued, and how much involvement cost them (a point remarked by Pratt and Phillips (2000b:118-9). Conversely, some reports in the set are both detailed and cautious - that for Project Bedivel emphasises the variability in outcomes:

“Some firms have made impressive progress, with readily measurable results in both financial and environmental terms - often demonstrating the ideal win-win result of waste minimisation systems. Others have made progress for less overt financial gain, but see the value of improved environmental performance in terms of ethical best practice, meeting customer requirements, or pursuing a policy of preparedness for future legislative constraints and compliance demands.” (1999:13)

To do justice to the character of all the reports would take a long review and this is believed to be a reasonable overview of factors relevant to the argument here.

Henningsson (2001) drew up a list of the matters which should be assessed regarding the work of the clubs and Leach (2000:30) a similar list of data ideally necessary for a Cost Benefit Analysis. I have slightly adapted these, and the matters are:

- the costs of project management including contributions in kind
- the sources of project management costs
- the costs of the project for the firm, including staff time and capital investment
- the benefits (including financial savings) to each participant and their likely duration
- the changes in environmental impacts and the time scale for this
- the characteristics of the participant firms
- the method of dissemination of the results and a measure of its effectiveness

The discussion above has shown some of the difficulties in obtaining such details, including the cost of the evaluations, the multiple aims declared, the lack of central co-ordination, use of volunteer companies and the problem of non-random placement. Others include the differing capacities and expectations of the firms involved. There were often no extant records of the consultants or other intermediaries working on a club. The modern practice of routinely disposing of records after a couple of years may mean that such matters can never be known.

At the national seminar on the clubs in March 2004, there were reports regarding the overview studies

done for Envirowise and for the Environment Agency by the relevant consultants. Steve Waring, who had worked on the two surveys for Envirowise, considered the different kinds of clubs, allocating them into three categories<sup>26</sup>, and considered the factors associated with success (generally considered in terms of cost savings achieved). In both surveys he reported no clear correlations between consultancy costs, or the type of model, and success; he found that more significant factors were the enthusiasm and skill of the person running the club and the companies concerned. In other respects the evidence from these surveys, commissioned for Envirowise' own purposes relating to its contract, was less useful, including matters such as: 'the promotion strategy of 1994 had been very successful' and that 'there was a need for continued support from Envirowise' (from the 2000 survey). They did, however, reveal something of how the projects were operating by their recommendations for 'better monitoring of the results' and for a review of the database held on the clubs and their acknowledgement of the importance of future funding (Waring 2004). The author of the overview report funded by the Environment Agency, Chris Radway of ENTEC, also regretted the "gaps in the information on inputs, outputs and management of initiatives, other types of approach and stakeholders' views" concluding that more information was necessary to "develop policy and actions in this area." (Radway, 2004).

This shortage of data is very curious for it seems likely that the government departments concerned justified such intervention at least partly on the grounds of rectifying information failure in firms! It is surprising that organizations as closely identified with scientific approaches as the Environment Agency or those operating the Envirowise contract, should appear to find this paucity of data sufficient. Similar questions could be asked of the committee which oversaw and scrutinised the activities of Envirowise regarding its contract with DEFRA and DTI. The corporate cultures of the respective bodies seem to have been put aside whilst they were operating within these voluntary initiatives, and yet the regulator was involved in the running of many of the clubs, and would, to an outsider, have been regarded as something of a guarantor of precision.

The academic papers evaluating and assessing the clubs were, of course, hampered by these factors, and many acknowledged this; some (e.g. Henningsson 2001:14) called for more action from ETBPP/Envirowise or the Environment Agency). Fifteen such papers were reviewed: in general they focused on participating firms and on factors associated with cost savings. A number attempted to carry out Cost Benefit Analyses, but few reports recorded sufficient parameters. Pratt and Phillips, for example, record their concerns about the lack of longitudinal studies:

"It appears that once some form of final report has been completed and published no obvious mechanism exists to revisit the results of the performance of the companies in the club. Therefore a large amount of potentially valuable data, for a range of reasons, never enters the public domain." (2000:20).

A consideration of previous evaluations of the waste minimisation clubs (see Table 2.1 at p.241)

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<sup>26</sup> The categories were 'extended consultancy support', workshop-based with limited consultancy' and 'self-help with workshops'.

makes apparent that a group of 10 clubs have been cited repeatedly by researchers in the formulation of conclusions about the clubs as a whole. It is argued that this practice results in a biased estimation of the likelihood of success from the clubs in terms of financial savings and flaws the evaluations done. Henningsson et al. also signal such a potential bias (2001:336). It should be noted that there are, however, different views on the form of bias: Steve Waring, arguing that because not all achievements were recorded, savings would be likely to be higher than reported, and maintaining that the failure rate was less than 25 per cent (2004). Against this it could be countered that clubs which had published reports were amongst the set which started, among the set that did not fail, and included early initiatives where consultancy costs, and so possibly quality, were far higher than could be maintained.

### **Conclusions to the chapter**

This review of the introduction and spread of the waste minimisation clubs reveals the fragmentation of responsibilities and the use of 'Best Practice' projects to demonstrate engagement with issues. Both departments concerned considered aspects of waste minimisation by industry as part of their remit. Both the Environment Agency and Envirowise were given roles concerning the promotion of waste minimisation, yet for neither was there a specific power to centrally coordinate or record what occurred. The chapter has outlined how these factors, in combination with others at the local level, particularly the spread of activities across numerous intermediary organizations, contributed to the repetition of the projects across the country without a robust system to ensure that funds were targeted, consistent measures used, or records kept for all initiatives.

By the period studied here, the 'problem' associated with wasteful use of resources had already been construed as one of encouraging waste minimisation in firms, the solving of which was likely to coincide with increased savings for those firms, thus reinforcing, not challenging the central planks of government policy of innovation, efficiency and growth. The approach chosen was a cooperative one involving governmental actors and agencies, non-governmental organizations and private organizations working in mixed networks. The state, rather than being the arbiter of values it wished to inculcate, placed reliance on intermediary organizations to bring about changes in target organizations, (in an unrepresentative approach based on both contract and voluntarism); this outsourcing of the task of voluntary change has similar features to the scenario studied by DiMaggio (1983). Similarly, the 'trust in numbers' as self-evident proof echoes the work of Ted Porter (1995) and the remarks of DeJean, Gond and Leca (2004) that measurements can act as a strategy to develop legitimacy and power<sup>27</sup>. The chapter has shown that those intermediaries engaged in promulgating information about the clubs made many claims, and these accounts of the clubs were in line with notions of efficiency common to ecological modernist approaches to change. Yet, intriguingly - for science-based organizations were involved - many key facts were missing and some of the claims-making was imprecise, involving exaggeration of benefits. Despite this there was a kind of simple certitude, a matter-of-factness, and a

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<sup>27</sup>All these references are discussed in the next chapter.

great confidence and pleasure about what was being asserted. Some of the findings and interim conclusions here echo those of Harrison regarding evaluations of voluntary initiatives in North America: she found that targets had been vague, systems for monitoring, verification and reporting slack, and that too few evaluations had been carried out and that they had overstated benefits (Harrison 2001:207-246)

Having suggested that there are factors here which deserve further examination, the next chapter considers the literature on institutional theory and to what extent it is suitable for examining short term initiatives aimed at bringing about voluntary changes in norms and routines within firms.

### **Chapter 3. Theoretical discussion: Institutional Theories**

This thesis examines a UK policy response to the major problem of grossly inefficient use of material resources across modern economies. This took the form, not of formal regulation, but of initiatives encouraging firms to establish, voluntarily, internal rule systems to audit their use of materials and energy. This chapter is a literature review exploring institutional theory, where, in some forms of the theory, rules have a unique importance (March, Schulz, Zhou 2000:8). It is, however, written with awareness of other rival approaches to understanding regulation - the distinctive contributions of theories of Normative Economics and the Economic Theory of Regulation as well as the writings of Porter and Liebenstein. The main argument presented here is that institutional theory has considerable capacity to explore and explain aspects of scenarios such as the initiatives studied here, particularly regarding rules and norms, yet it is not obvious how best to 'place' certain aspects of the initiatives within the constructs of the theory. It is suggested that some fairly new and diverse writings proffer fresh ways of perceiving and exploring voluntary regulatory initiatives in terms of the constructs of the theory

Institutional theories focus on the socially derived understandings and shared constructs which shape behaviours; each established institutional setting is considered to have its own set of beliefs and accepted rules, together with associated roles and mores. This centrality of rules within many of the writings means that the operation of regulation in its various modes should be uniquely relevant in this way of perceiving society. The theoretical approaches of institutional theory comprise a rich, rapidly expanding and complex set, with sociological, historical and economic forms. Randles describes the studies, which straddle across subjects, as a 'wide range of perspectives' huddling under the 'umbrella' of the term 'institution' (2001:13). In these studies new findings and new distinctions are being formed at a great pace. There have been a number of attempts to classify the field; for example, DiMaggio and Powell 1991, Hall and Taylor, 1996; Peters 1999, Campbell and Pedersen 2001:252. Lowndes, with some sense, has characterised the different new approaches and aspects as vignettes (1996:182).

The review begins with a concise introduction to institutional theory before an examination of constructs which are considered to have considerable relevance for exploring the initiatives. These comprise sets of ideas about first, rules as a social phenomenon, second, literature concerned with the influencing role of the state, and third, ideas which seem appropriate to describe the parties, claims and activities found in short term initiatives. The part on rules as a social phenomenon discusses ideas on rules and the notions of legitimacy and symbolic display, ideas of how organizations abide as groups, showing allegiance to common rules and norms, how these relationships amongst organizations are thought to emerge, and how, by using a novel concept, non-conformity with rules

can be seen in a more subtle way. There is then a brief examination of the literature on rules and norms deriving from the state and a consideration of current ideas concerning regulatory roles in shaping change. If regulatory roles are poorly understood, this may link to some changes occurring in law and legal practices, and the next part briefly reviews two such theses which may be apposite here. The final part examines possible ways of linking and entwining some of these common themes in examining short term projects, considering first, the notion of intermediaries and their roles, how their claims-making might be viewed in terms of 'Accounts', and lastly the - potentially explosive for the theory - small literature on institutions and new, short-term modes of organizing work, particularly the use of the project form.

First, however, an important distinction is drawn - or rather, not drawn. Following various developments there was, during the late 1970s and early 1980s almost an explosion of fascinating books and articles suggesting that institutions were influencing society in ways of which people had been unaware: for example, Meyer and Rowan 1977, Di Maggio and Powell 1983, Meyer and Scott 1983 and March and Olsen 1984. These, with work from institutional economics on the phenomenon of transaction costs, laid the foundations for what is often termed 'New Institutionalism'. This was associated with claims (e.g. DiMaggio and Powell 1991) that the newer writings represented a fundamental shift from older work on institutions done in the early part of the twentieth century (such as that of Veblen, Commons, Mitchell, etc.) Whilst a case can be made for this, many consider that there is no such sharp divide, for a careful review of such early work contains many elements present in the later and the distinction helps to maintain ignorance of the contributions of these early writers (Hodgson, 2003, Yazdifar 2003; see also Hirsch and Lounsbury 1997). I accept this view. I now return to a more general overview of institutionalist ideas (based largely on modern writers, particularly those sometimes referred to as sociological institutionalists).

Scott (2001:48-50) has set out an accepted view of the general consensus on the nature of institutions. They are resilient social structures which endure across generations, providing stability and order and, often, resistance to change. Institutions are seen as encouraging and enabling certain ways of acting and relating, determining the values set on skills, and at the same time defining boundaries of morality and culture for actions which are not deemed appropriate. Thus it is presumed that people are responding to rules and socially structured forms of thinking about the world (Douglas, 1987) in attempting to carry out what is expected of them by their prevailing institutions. North (1990:3) describes institutions as reducing uncertainty. They can therefore facilitate, say, efficient exchanges or support property systems which lead to efficient use of natural resources; conversely, different institutions may lead to economic ruin in particular societies<sup>1</sup>. Of interest for this thesis, the concept of institution also includes associated behaviours including deployment of power over, and ways of using, material resources (including symbolic uses of them) (Giddens, 1979) and deployment of power to respond to discrepancies from rule-following (including symbolic sanctioning).

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<sup>1</sup> There is a strain of Institutionalism which presents institutions as inherently rational and efficient solutions to social problems, for example Williamson 1975. This is not a view adopted here.

There are many institutional systems in society which 'intersect, overlap, compete for attention and adherents and constrain some actions but enable others' (Scott, 2001:188). Friedland and Alford describe contemporary central social institutions as conveying potentially contradictory rules and "hence make multiple logics available to individuals and organizations" (1991:232). Thus in any one situation the behaviours of the groups of people involved may be shaped or constrained by a unique configuration of institutional pressures - this gives scope for a deep and complex (though possibly non-replicable) understanding of the mechanisms shaping behaviours in particular situations. Much of the current writing is concerned with the institutional constraints presented by organizations, and true to cultural context, many of these writers are deeply interested in the firm and its values, norms and routines. Others have drawn attention to the more wide-ranging construct of organizational form and the way that differing modes of organization can shape behaviours, thinking and outcomes, each form presenting a particular repertoire of action (Clemens, 1996; Rao, 1998; Tilly, 1979).

### Rule systems in institutional theory

This section sets out basic ideas from institutional theory concerning rule systems<sup>2</sup>. Institutions can be considered as having cognitive elements and normative elements. At the root of cognitive elements are socially derived shared understandings and meaning systems which people use to interpret and classify what occurs - institutions 'generate not only that which is valued, but the rules by which it is calibrated and distributed.' (Friedland and Alford 1991:251). These basic understandings about the important issues in the social world reveal themselves and play themselves out and are over time modified or reinforced by the behaviour patterns of human actors. They are deep and underlying and their 'taken for granted' character is well described by Mary Douglas, (speaking more generally about how institutions shape social action) when she writes of the invisibility of successful institutions (1987:93). Built upon these shared understandings, are further cognitive elements - representational rules and constitutive rules. Representational rules concern systems such as accepted symbols, and how knowledge claims are expected to be validated. They provide 'organizing principles' guiding those within the institution when they act, work and function. Constitutive rules are deeper, controlling *inter alia* those who are deemed relevant actors, what is expected of them and what they have power or leave to do or should do. (Karnoe 1995:269-272.) Thus these ideas make clear the importance in social life of unspoken understandings, of symbols, and powers necessary for people to perform different roles. On this foundation, ideas of what we would more generally term rules are built.

Normative elements are considered to comprise normative rules (the prescriptions of what are appropriate routines and ways of behaving, explicit and implicit) and regulatory processes (Scott 2001:54-6). Many of the most commonly used definitions of institutions focus on their association with rules (famously North 1990:4). Rules, in this approach, are not separate from norms, but

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<sup>2</sup> Some economic institutionalists see institutions not so much defined by rule systems as by their capacity to provide conditions of equilibrium.

subsume them, so that formal rules, informal constraints such as conventions, norms and self-imposed codes of conduct, legal frameworks and modes of enforcement are included in a group of factors acting on any human grouping. It is commonly accepted that there will be more than one set of rules in operation, and that some will facilitate certain actions better than others. Such a set of ideas appears very conducive to understanding notions of voluntary regulation and its links to formal regulation.

Some of the most pervasive and intriguing writing on institutionalism relates to situations where symbolic displays accompany or dominate rule systems. In multiple rule systems, one system, ostensibly powerful, may be treated as inferior by actors; in some cases mechanisms and routines build up around rules, which camouflage power systems (Covaleski and Dirsmith 1988, Hanninen 1995:181). There may be use of a rhetoric which suggests a rationale which has not, in fact, been used - the rationalised myth (Meyer and Rowan 1977). Thus systems ostensibly following efficiency criteria may instead be pursuing quite different logics. Similarly, symbolic sanctioning may occur, where order and stability are exhibited, and rituals and procedures ostensibly followed, but there is no real deployment of power to respond to discrepancies from rule following.

The next section in this review of institutionalist theory considers a concept which relates norms, practices and power systems and which is integral to this thesis.

### Organizational fields

The organizational field is regarded as a key concept in institutional theory. It forms an intermediate set between the institution and the single organization and so provides a means of examining and analysing institutional systems which mediate between the two (Scott, 2001:136 and 207) whilst linking to ideas of embeddedness (Granovetter 1985). The next paragraphs consider the intrinsic qualities attributed to organizational fields in the literature, and in particular the ways in which they are said to emerge and change. There is then an examination of recent work in regard to the role of those who usher in new fields or facilitate changes within existing fields, and a discussion of how they are categorised.

Fully-developed organizational fields are very much normative collectivities. Their members share norms and values, using shared 'repertoires of principles' or logics - with which they judge matters, negotiate and deal with problems. Fligstein says they are also 'cultural constructions whereby dominant and dominated coexist under a set of understandings about what makes one set of organizations dominant' with the dominant trying to set up conditions so that they continue in their privileged role and the dominated either accepting the status quo or mounting challenges to it. (2001:68) Much of the writing on institutionalism thus implies that for pollution prevention to become an accepted practice, it would have to become an accepted norm across numerous fields.

Yet the literature also suggests that this would not be a simple matter to bring about. Fields are loci where there are (disputed) disparities of power and activities within them are often represented in terms of the dynamics of these imbalances. Where there is acceptance of their dominance, big

organizations will manipulate the activity of a field or even the machinery of state to maintain it, and they may wish to do this when new approaches seem to threaten sunk costs or established practices or ties. Where there are challenges to power positions within a field there is jostling of organizations and formation of alliances to establish their own definition of issues and to demonstrate the legitimacy of particular organizational forms (Barnett and Carroll 1993). Crucially, in contrast to the view presented by neoclassical economics, Fligstein claims that organizational fields have a role in blunting, even negating, competition between firms; as the price mechanism can destabilise and thus threaten the financial stability of firms, the power systems within the field act to remedy this. Underlying apparent competitive activity within an industry, he argues, is common membership of a field and the need for the survival of the field and the organizations which comprise it. The exact mechanism for this is unclear; Fligstein (2001) - breathtakingly - argues that the market itself operates as an organizational field, and as the price mechanism can destabilise and thus threaten the financial stability of firms, the power systems within the field act to remedy this.

In numerous situations there is a multiplicity of institutional models operating on fields (Borum and Westenholz 1995), producing different levels of awareness of different sets of duties and responsibilities, and creating tensions - some of them creative. The interplay between the different fields is thought to provoke further patterns of power plays and coalitions and thus, over time, varying ideas and challenges to which people attend<sup>3</sup>. This seems to me to show greater awareness of the situation within industry at present: for example, the current variable uptake of greening of business ideas generally and the different perceptions of duties and appropriate behaviours which the introduction of ideas of protecting ecologies into scenarios dominated by other practices, imply. Hoffman (2001:15) argues in a passage that is directly relevant to the transfer of environmental ideas across firms:

“Firms exist within multiple fields and respond to them with different levels of attention. As a result, one division of an organisation could adopt proactive environmental management while another lobbies Congress to relax environmental standards.”

Of course, if there are multiple fields in operation, only some of them will have the power to drive behaviours where there are political choices to be made (where there are disagreements but only one solution is possible for a collectivity<sup>4</sup>). Linked to this, the concept of organizational field, like Weber’s ideal type of *stande*, only really applies neatly to dominant, well-established and influential fields. (This may prove to be an example of an ostensibly good theoretical idea chasing rather poor empirical evidence - Greenwood, Suddaby and Hinings (2002) point out that there have been few studies of field dynamics, as opposed to the effects of field dynamics - which of course one would expect would be brought about by powerful fields).

If this is what established organizational fields do, how are they composed? The classic definition (of a fully-established organizational field) is by DiMaggio and Powell:

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<sup>3</sup> (as in the discussion in Anand and Petersen 2000)

<sup>4</sup> This is Sammy Finer’s definition of the political.

“sets of organizations that, in the aggregate, constitute a recognised area of institutional life: key suppliers, resource and product consumers, regulatory agencies, and other organizations that produce similar services or products”

(1983, reprinted in Powell and DiMaggio 1991:64-5). Scott, (2001:83-4) extends this slightly to include funding sources, exchange partners, competitors and regulators. Hoffman’s list adds activists, investors, insurance companies, the local community, financial institutions and consultants. (Hoffman 2001:15). The intention is undoubtedly - if untidily - to include all organizations which participate in a significant way in the faring and flourishing of an industry or social function. Fligstein, again, explains this clearly: they are “arenas of action where organizations take one another into account in their actions” (1998:26). The organizations are referred to as embedded in these larger groups, which are often defined in terms of product lines or markets. The term organizational field is usually deployed to describe a particular industry or profession, such as the college publishing industry (Thornton 1995), the chemical industry in the U.S. (Hoffman 2001), the accountancy profession in Canada (Greenwood, Suddaby and Hinings 2002), art museums (DiMaggio 1991) and so on. Curiously the state, even in its fragmented incarnation, does not seem to have been allocated to a position within this system - whilst its regulators have. The size of organizational fields is unclear and apparently unimportant; from the definitions given it might be possible to have fields consisting of only a handful of organizations. Di Maggio’s definition in his 1983 paper on State Expansion and Organizational Fields, is wonderfully pragmatic and is adopted here:

“By organizational field, I refer to sets of organizations that together accomplish some task in which a researcher is interested. In the economic context, a field is similar to what economists call an industry, although not necessarily restricted in membership to direct producers... A field is always an analytical construct, and how one defines it depends upon the phenomenon in which one is interested.... The extent to which a field constitutes a network of interaction is always an empirical question.”

In line with this freedom of conceptualisation, some authors allow not only for multiplicity but for subsets within fields; for example, Greenwood, Suddaby and Hinings (2002), who studied the accounting profession within the organizational field of professional business services, examine a ‘community of organizations’ within a field.

### Understanding the emergence and establishment of organizational fields

It can be seen from the above discussion of fields, as entities recognised by their effects and the motivations they induce - and not, of course, always existing (Levi Martin, 2003:42) - that determining how and when new fields emerge and establish themselves, is not easy, not least conceptually. There is currently great interest in this area with a variety of approaches. Some of the dominant, early writers consider the process of development of new fields is one whereby over time, specific roles relationships and behaviours become more routinised so that common understandings are continually reinforced (DiMaggio, 1983); these early processes being termed structuration, and considered to precede the development of institutional isomorphism (DiMaggio, 1991:267). Other writing presumes the very early stages involve a period of confusion and debate, then the gradual emergence of a consensus of values, norms and beliefs which become the legitimised practice which it

is 'rational' to follow (see Scott 1994c:208-212). Yet other approaches suggest that the coalescence is around the issues argued about, not their resolution (Brint and Karabel 1991; Hoffman 1999:352). It is unclear how many changes must occur or how much time must elapse for a new field to be said to exist. This literature, with its rather ragged edges, could be very relevant to the scenarios studied here, for the aim of the initiatives was to usher in widespread new practices and new values across industry, and might be construed as attempting to set up a new field, providing advice on pollution prevention.

Where fields are forming, change is thought likely to be more radical than where they are well-established, for new members may introduce different, contesting, interpretative frameworks (see, for example, Hensmans 2003), and then justifications for the preferred approach. In new fields there is a great need for parties to demonstrate their trustworthiness; there are few templates for action but respected patterns of behaviour must be developed if different organizations are to coexist together and some system must emerge to 'institute' such behaviours as legitimate (Dejean et al 2004). There are a number of papers setting out modes in which 'legitimacy' - the inculcation and then acceptance of groups, ideas or practices as true members or parts of a (new) collectivity - is established, for example Aldrich and Fiol 1994; Suchman 1995.

There is a considerable consensus that the emergence of new fields involves recombination of earlier, pre-existing institutional components (Scott, 2001:192). Scott quotes Stark, (who was writing of changes in Eastern Europe at the end of the twentieth century):

"Change, even fundamental change, of the social world is not the passage from one order to another but rearrangements in the patterns of how multiple orders are interwoven. Organizational innovation in this view is not replacement but recombination." (1996: 995)

But where are these recombinant ideas and practices to come from?

### Ideas of entrepreneurialism in relation to organizational fields

The concept of institutional entrepreneurs was introduced by DiMaggio (1988) to describe people and organizations which shape emergent institutions<sup>5</sup>, creating, by their social skill, new systems of meaning that succeed in tying together the ways that previously quite disparate groups function. They 'outplay' rivals, legitimising their own approach and devise strategies to establish stability of interaction between a number of organizations. They do this commonly at times when new industries and their associated institutions are being developed. They are thought to have the capacity not only to recognise potential solutions to problems faced by an existing organizational field, but the social skills to convince and persuade those in the field to change their practices and values - or others, outside it, to enter it and thus change practices and values (see Fligstein 1997). It is argued that in this process the relevant stakeholders must be convinced that those bringing new approaches conform

<sup>5</sup> The notion of institutional entrepreneurs with their supporting constituencies was an advance on previous understandings within institutionalist theory at the time. It was introduced to overcome failure to recognise the role of interest-driven processes and group conflicts (1988:1-2) and the 'chronic use of the passive voice' (1988:10) to explain institutional developments.

or link sufficiently to revered values and norms to establish a form of legitimacy; for example they may show that they link to existing cognitive frameworks (Kondra and Hinings 1998).<sup>6</sup>

The social circumstances permitting such changes to happen do not seem to me to be clearly set out - what factors determine who should act as bellwether and who follows? Some writers seem to assume that such people would be activists (see assumption in Hoffman 2001:16 on their co-optation). There is no clarity about what social position these claims-makers are likely to hold vis-a-vis the fields in question, nor how it is that they may influence the organizations within the field although it is suggested, for example by Hensmans (2003) that they deploy 'logics of legitimization' (surely that is what we all do every day?). There are common assumptions that would-be change makers wish to gain power (some writers perceive fields as 'arenas of power dependencies and strategic interactions' e.g. Brint and Karabel 1991) yet why should such power seekers gain co-operation? The elitist assumptions of people 'above the crowd' or separate from the mass of members of a field also seems not in accord with other expectations in the theory.

One conceptualisation which seems to meet several of these concerns and to be apposite to the situation considered here, is that of "community entrepreneurs" as used by Wang and Swanson (2003)<sup>7</sup>. They examined the early diffusion of an innovation, the introduction of a particular suite of integrated software applications for service industries *as it occurred*. They were thus able to observe the early stages of the changes, and ways in which multiple entrepreneurs from various industries - analysts, consultants, vendors, conference organisers, journalists, academics, etc. - mobilised as a community, acting separately but in an interdependent way, to pursue opportunities. They argue that early adopters and espousers are less heroic than well-placed, and well-linked to relevant networks. Each was pursuing different opportunities, but the success of each depended on the overall success of all - for the new system must be adopted if they, individually, were to prosper. This interdependence led to co-operative actions although much co-operation was problematic and many were not consciously aware of the extent of the 'community'. The researchers found that the actors collectively shaped the claims made about the innovative software, so that it was social cognition, rather than individual action, that drove the diffusion of the new way of operating (p.9). This recent piece of work has considerable implications for a situation such as the one to be explored, and for institutional theory more generally, leading to an even greater appreciation of the ways in which organizations of many different kinds may interact over an issue. Wang and Swanson suggest that considering the early stages of the institutionalization of innovations using a multi-agent perspective is likely to be particularly useful in regard to the operation of organizational fields, where previously the focus tended to be on one actor or group (2003:39).

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<sup>6</sup> This writing presents various problems for those who see Agency as alien to the concept of dominating institutional influence. This is not a problem, however, for those who have read Veblen (for example Veblen [1898], 1943:81) who skilfully describes the ways that institutions act upon individuals who then, in their responses, inevitably and inexorably impact upon institutional practices (though his faith in natural selection is a further issue).

<sup>7</sup> See also Mezias and Kuperman 2000 for a social perspective on entrepreneurial activity.

These are not by any means, however, the only conceptions of how external influences might be brought to fields. Recent work has concerned the involvement of collaborations, or assistance between parties from different industries, in the development of fields. Suchman, for example, has studied the assistance of lawyers in the development of Silicon Valley. Work by Boxenbaum (2004), and Lawrence, Hardy and Phillips (2002), considers the generation of 'proto-institutions', where new practices, rules and technologies derive from collaborative relationships between organizations but have not yet diffused widely. Hensmans examines the interventions of outside actors attempting to drive change in existing fields by considering the matter in terms of the literature on social movements, and the actors as 'challengers' deploying 'rhetorics of legitimization'. Other work focusing on the process of 'translation' of ideas generally, is applicable to emerging fields, for example, Czarniawska and Sevon, 1996, Rottenburg 1996. Sahlin-Andersson (1996) speaks of the continuous 'editing' of translated ideas into prototypes, which are subsequently adapted creatively by recipients, as they interpret the new approaches and roles as a means to solve their own local problems.

Yet are these influencers from outside always private parties? What is the relationship of the state to institutional entrepreneurialism and its variants? Where states promote changes via voluntary regulation, even if they outsource this task, it seems very different from the situation where private people champion a change for commercial or ethical reasons, yet how is it different? Might the various parties involved be said to have a quasi-regulatory role, or a quasi-policy role? (Scott, 2001:96) Alternatively, might the state and its direct agencies be considered a type of organizational field permanently delivering influence concerning what is acceptable to society as a whole, as a resource to other fields? Is there any explanation here for the seeming over-readiness of the intermediaries to record publicly that the projects were a success?

#### Considering voluntary regulation in a more dynamic and social way

It was noted in Chapter 1 that voluntary regulation is usually conceptualised as relating to establishing practices of self-regulation across an individual organization or set of affiliated organizations. It is often linked to the notion of a firm 'going beyond compliance' relative to existing regulations, surpassing them by defined increments on the standards required by law. Whilst not particularly well theorised, the understanding is generally that their knowledge of their operations allows them to surpass the required standards in ways which will still minimise their costs. (These scenarios presume rather a normative view, that firms in general meet the standards required by law, and that, working in a rational framework, firms' decision makers have power to instigate and shape distinctive new practices, having calculated and chosen between different costings.)

Whilst 'best practice' initiatives, which are relatively common in the UK, formally meet the definition of voluntary regulation, they have been rarely studied as examples of voluntary regulation, research being dominated by studies of negotiated agreements, and perhaps as one consequence, it has to be admitted that the features of 'best practice' initiatives do not resonate particularly well with some of the descriptions.

Recent studies of transnational situations and trends by Sahlin-Andersson and others have led to a new conceptualisation, describing forms of voluntary regulation deriving from, and concerned with group dynamics and group pressures to spread new norms. They seem much more apposite to the initiatives studied in this thesis. These changing practices have been categorised by Jacobsson and Sahlin-Andersson (2006), as 'soft regulation'. They describe situations where organizations are encouraged to join (often prestigious) regulatory groupings and invited to voluntarily commit to rules and norms which are often conceptually linked to what is considered good practice in management ideas, especially practices which facilitate monitoring, such as audit.

The 'soft' rules noted by these researchers are often in the form of new best practice standards or recommended ways of operating, bolstered by claims that they stem from expert understanding, and are rational, technical and based on science. They are introduced in an interesting social context via dialogues of equality that presume all the parties will want to share such practices, yet in ways that leave individual firms great freedom to choose the rules they will adopt, or to edit them to fit their particular circumstances. The organizations, by their engagement and influence, are described as then fostering the increased use of such common norms across communities of organizations, both public and private, strengthening the practices adopted as community approval builds, and this, given the complex linkages of these 'soft rules' to requirements already demanded by law (and by customers and constituencies), creates what she calls 'regulatory constellations, which may be extremely difficult for states and other organizations to forget'. Like other forms of voluntary regulation, these 'soft' rules are not legally binding, yet there is a particular ambivalence about these vaunted 'rules' linked to rather processual social factors. This is because many actors, from quite different backgrounds, become engaged in steering what occurs and in the shaping of norms. Also, the norms adopted, bolstering as they do 'management' ways of thought, intertwine with norms promulgated and practised in other similar arenas, and firms frequently engage with more than one such arena. As these groupings organise, it is described that they help to shape the operative norms and identities of the parties. Yet there are no formal systems in cases of breach of the fresh standards, and frequently, and rather creepily, it is the organizations that have adopted the rules for themselves which report back on their own compliance. Significantly, Jacobsson and Sahlin-Andersson write that it seems to be assumed that organizations will comply in their own self-interests, and to 'preserve the good name of the group' and she records sanctions of 'blaming and shaming' operating. Interestingly, in terms of institutional theory, there appears to be in such systems both a breakdown and a dispersion of formal regulatory roles, with conformity to rule not deriving from inured habit but because, following values based on expertise and reasoned argument, the parties perceive it to be in their best interests to follow the rules.

This new way of conceptualising voluntary regulation appears to have many features which are applicable to the clubs, and a number which seem foreign to them. Whilst the idea of 'soft' regulation seems an improvement on the individualist assumptions of many ways of thinking about voluntary regulation, it does not articulate how such developments in regulation might impact on those great structures of institutionalist thought, the organizational fields, and their dynamics.

How might ideas about the ways changes occur to organizational fields improve understandings of the processes of voluntary regulation? The strength of the concept of organizational field, seen as sites of particular norms and logics and jostlings for power, might provide a new way of understanding processes of trying to create voluntary changes across industry. It enables us to replace the hackneyed *dramatis personae* of 'policy makers,' 'the public' and 'the industry' and the accustomed accompanying narrative frame of considering policies as stemming from a set of persons (often presented as knowledgeable and wise) being presented with distinct intellectual problems and, forming a decision, inflicting policies on a kind of presumed lumpen mass, in a plotline that highlights fears that the decided remedy has varied in implementation, with an expected denouement of clear success or failure. Instead, viewed in terms of field theory, what is expected is an ongoing series of power plays comprising much more complex casts of characters, each set within their own institutional normative and linguistic framework and their own occupational setting - their organizational fields - paying some allegiance to those fields and respect - voluntary, grudging, or delinquent - to the normative systems operative there. What occurs as a result of attempted change could be expected to vary with the nature of the new, proffered normative alignments and their acceptability as a replacement for the old, and with the new positions for incumbents within those fresh normative understandings.

The key to what ensues becomes, on this reading of the literature, not the policy makers (who comprise a mere part, and are themselves subject to their own institutional understandings) but the varied parties attempting to introduce change, their challenges, the kinds of justifications they deploy, the stages in acceptance or rejection of their activities and how such new types of discourse and understanding about appropriate behaviours for the field are in fact taken up, toyed with, blocked, or superseded, and at what stages<sup>8</sup>. Following such attempted introductions of new ways of thinking and/or behaving, for the new approaches to become embedded as taken for granted parts of day-to-day systems, there must be regulatory changes brought into being by other parties who will facilitate and enforce the new routines and ways of behaving comprising the new normative culture. This is not straightforward, for the regulators of the old system may be tied to it and deploy only the discourses and arguments appropriate to the previous states of affairs. It may be impossible to reframe professional identities sufficiently for this group to accommodate to new ways of operating. Other parties may move in or try to move in to the opportunities provided. Where existing institutional arrangements remain strong, most of these attempts at change will fail. Regulatory space, presumed so often to exist around the policy making process, as it were transposes into regulatory *pace* - where the adaptation of those with regulatory roles to new modes of operating and interpreting the world becomes crucial. The once powerful forces for determining normative behaviour may find themselves outpaced and by-passed, presiding over ossifying practices whilst very different ways of describing the world and operating within it spring up and establish new types of industries, new ways of making measurements, new market leaders, and possibly, the basis of a new prosperity.

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<sup>8</sup> See also the remarks on policy as an interactive process involving individual domains in Foxon and Pearson (2006:4)

Even if this approach is not accepted, the constructs which institutionalist theory provides, and the notion of entrepreneurship activities stretching across communities and networks, appear to have considerable potential to explore the problem of interest here in a new way. The next section relates to an often avoided aspect of normativity - that often not all is as it seems.

### The concept of bricolage and its applicability here

Behavioural rule systems are complex evolving entities, encompassing a range from strict legal rules to optional norms; often compliance is not straightforward for it is unclear what behaviours are being elicited or what rules apply. A possible response where existing societal rules and practices are perceived as unsatisfactory is the use of *bricolage*. This concept has been examined by some noted authors and two rather different meanings are introduced here.

The first use was introduced to institutional writing by Mary Douglas (1987)<sup>9</sup> and stresses recombination. Where new problems are faced and the accustomed institutional ways of understanding and responding to them fail to provide sufficiently good resolutions to those problems, people may take up and deploy approaches or systems from another institutional form to resolve the difficulties instead. The term *bricolage* is used to connote this 'cobbled together', where people imaginatively (and probably courageously where there are value-based conflicts between different institutional logics) re-use routines, models and orderings which originated in a different institutional setting, in a fresh institutional context where they may, or may not, meet the new needs. This way of understanding *bricolage* is used by several leading institutionalist writers as describing a mechanism of introducing institutional change (for example, Campbell 2004:69-74). Scott refers to it as the creation of "novel combinations of earlier institutional components", continuing:

"Principles are amended and compromises reached to form new settlements; models are reconfigured or combined into various hybrid forms; and routines are reassembled to serve modified goals. New institutions borrow aspects of order, meaning and legitimacy from earlier institutions." (all, Scott 2001:192)

The concept provides a clearly institutional explanation for evolutionary changes rooted in institutional ideas, (although claims that it occurs may turn on the extent of the researcher's knowledge of the institutional past). To summarise, the notion essentially relates to the transposition of logics and ideas from one institutional context to another, in a process rather like hybridisation.

The second meaning of *bricolage* considered here stems from writings by de Certeau (1984:xi-xxiii), not regarded as an institutionalist writer. He uses the term in indicating a range of behaviours where people, subject to rules, adapt to them and to the power systems involved, in creative and ingenious ways - most notably, for the purposes here, where they give the appearance of complying with dominant rule systems when their behaviour is actually quite otherwise. They appear to fit in to prevailing norms, but do not. His suggests that systems of power, despite their strategies and

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<sup>9</sup> echoing Levi-Strauss, who wrote of diverse 'wrought products' from previously coherent sets being put to new uses, so that their new 'transformations' carry with them a mix of previous modes of understanding and behaving (1966:35-6)

territories of rule, are routinely met with clandestine responses by groups or individuals using “makeshift creativity” (viv-xv) and ‘ingenious tactics’ (xvii), of “how to get away with things”(xix) regardless of the fact that spaces are pre-ordered and institutionalized; sometimes the guileful responses occurring at lightning speed.

It is suggested that the term *bricolage* may have great applicability for exploring the subject matter here, and that either or both of these rather different meanings may be relevant. The bringers of new approaches to organizations - such as occurred where intermediaries marketed the waste minimisation clubs - may well normally operate using quite different institutional logics to the organizations they hope to influence. They may present their ideas by transposing tried and respected norms and modes of operating from their experience elsewhere onto existing ways of operating in their target market, aiming to show that these new ways will solve problems. Alternatively, actors may creatively respond to new, strange or difficult situations not with the use of alternate, transferred, established practices but with the tactics often deployed by the less powerful - operating creative little improvisations and manoeuvres, often in such a way as to create small fiddles or hobbles, so that they give the appearance, the façade, of conformity with some respected rule system without entering into its spirit (de Certeau 1984: xviii).

Having introduced this possible variant where new rule systems are introduced to social groups, there is now a brief consideration of writing on the state and its modes of influencing, the regulatory roles associated with state activity and the way that legal systems of governance are changing.

### The state and regulatory roles in the institutional literature

Parts of the institutional literature focus on state coercive power (North 1990:64; Oliver 1992:576-7; Scott, 2001:53-4) but other writing portrays a circumscribed state, sometimes engaging in more inclusive forms of government to achieve its aims. It is this second aspect which appears of particular relevance for exploring voluntary partnership projects. In this mode the state is presented in themes echoing fracturing, plurality of rules and negotiation, and in some respects as lacking capacity to achieve its aims (Stone 1975; see also Vermeulen, Büch and Greenwood, forthcoming). Garud, Jain and Kumaraswamy write of the state *assisting* in the determination of matters where there is contestation of standards (2002:209-210 - italics mine). This apparent lack of capacity is underlined in recent studies from Italy by Grandori, Soda and Usai (1999), exploring situations of multiple rules, some countervailing, which describe enduring situations where state rules operate amongst, rather than dominate, other rules.

In some recent writing, and often accompanying the newer view of the fractured state, the term ‘regulator’ is used increasingly as a kind of convenient umbrella term, comprising different types of parties - including state regulators but also others who have a shaping role in the behaviour of organizations. Such ways of using the term usually accompany an appreciation of the role of self-

regulation and an enthusiasm for it. Mediation and co-operation loom large in several of these accounts: regulatory agencies (the definition of which, however, varies) adjudicate and mediate between multiple competing claims (for example, setting technical issues against costs and also public health concerns) and “enable the formation and reproduction of shared meanings and understandings” (Greenwood, Suddaby and Hinings, 2002:61). Exploration of the regulatory role is curiously undeveloped in the literature. This unsatisfactoriness in a theory which in essence is one about rules and norms, is rather surprising. Scott asserts its importance whilst also pointing to the need for more research:

“there is much to examine in understanding how regulative institutions function and how they interact with other institutional elements.” (2001:54)

There are many areas where there is a lack of clarity - for example, it is unclear how regulation is thought to, or meant to, articulate with other constructs in the theory. Again, there is comparatively little exploration in this literature of basic non-compliance, evasion or avoidance as an activity, nor of inadequacies or failures by regulators to enforce rules or to enforce them equally. There is, similarly, little writing explaining why some people might need to be induced to follow particular rules or sets of rules when others do not. Probably these are difficult things to research. Also, in some of the schemas, whilst the regulatory role is said to be part of the institution itself, the place of the formal regulator as an actor and the nature of regulatory activity (and the associated constitutive rules which apply to them) is rather unclear. Without the expectation of non-compliance, what is it thought that regulators do? What does regulatory activity consist of? If there are many concerned with setting standards and agreeing claims, what determines precedence? Is there merely obfuscation of state power, or has it, in some respects been abandoned? How can such activities be viewed theoretically?

There is a tendency in the current literature to treat the term regulation as embracing all kinds of shaping and influencing processes, with state regulation at one end of a continuum and self regulation at the other. In this writing the focus, in many cases, becomes the influencing role, and criminality and the use of force against it is, as it were out of focus, or treated as a rather specialist niche problem which can be set apart from the other activities deemed ‘regulation.’ It is the literature on the practical results of this state (non-coercive) influencing role which is discussed next, beginning with a well-known thesis by DiMaggio (which is potentially very relevant to the argument here) concerning its surprising structural effects on organizational fields.

#### How state actions may instigate voluntary, and sometimes unanticipated, changes in organizations

DiMaggio in 1983 observed that the US State had expanded its role and expenditure considerably, in large part by outsourcing work to private sector organizations via grants, contracts and co-operative agreements. Often funds went to third party organizations already working in the area to be supported; for example, to community groups or local orchestras. Whilst there was concern that these third parties used the funds expeditiously and for the stipulated purposes, DiMaggio posited that the major effects of this funding were not on the recipient organizations or the targeted social

problems, but on making the structure of the relevant organizational fields more pronounced, steady and strong and the organizations more similar. He suggested, and showed, that being able to obtain extra resources from a single agency led to processes of field 'structuration' (citing Giddens, 1973). more interactions between organizations in the field, more information passing between those organizations, more coordination between them, some becoming dominant, later, the creation of coalitions, and the development of a shared ideology (he suggests increased concern for professional standards).

The program he studied established an agency with funds (which grew steadily) and a remit to pass those funds to organizations that "employed artists, presented performing arts work or displayed visual art" (p.150). The agency soon began to encourage increased interaction between its potential recipients partly because of its own need,

"shared with almost all government agencies, to develop constituencies that can support the agency in its quest for appropriations."

In other words, the central agency itself, for its own survival and expansion, needed to be able to demonstrate that its work was needed. Also, to make its allocation work simpler, it favoured areas with their own agencies or arts councils. Trade associations came into being or were revived; indeed, DiMaggio remarks

"The purpose of these trade associations is, at base, to represent a constituency with whom public agencies can negotiate."

(Sentiments to be echoed, very closely, by civil servants in the circumstances investigated here.)

The existence of the funding agency also created 'a small industry of agency watchers.' (1983:152) producing publications about grant availability and conferences and workshops showing applicant organizations how to appear as efficient, worthy applicants, and incidentally, in stressing efficient management, encouraging applicant organizations to employ ex-managers rather than ex-artists or musicians. The process continued: large organizations receiving large grants became both legitimated and revered; members of their teams would get speaking engagements and be invited to sit on review boards, etc. Once established, these associations would lobby for more federal funding and opposing funding cuts. It became important that arts organizations staff were professional in what they did, and a consciousness developed that they were part of a field of arts administrators which it was important should survive. Thus political decisions that (entirely non-coercive interventions of) assistance should be given to artists became translated, by this mode of implementation, into a cascade of extra organizations featuring managerial-types, vying for funds. Crucially, the organizations in the field tended to become isomorphic, possibly counter to the political intentions to assist artistic creativity.

A variant on this thesis has developed which examines further unanticipated ways in which the state may, without coercion, or with minimal coercion, bring about profound change in organizational fields (for example, Dobbin and Sutton 1998, Edelman 1990, Edelman, Uggen and Erlanger 1999). Classically, the studies are of apparently unprompted significant and widespread voluntary changes after formal regulations have been promulgated and focus on U.S. experience. It is argued in some

papers that the state, although normatively highly influential, may create a lack of precision in its regulations which are therefore hard to interpret and enforced feebly. In response to this uncertainty as to how to be in compliance, waves of somewhat proceduralised voluntary approaches using linked rationales to those supposedly in the legislation develop across relevant organizational fields. Edelman, Uggen and Erlanger, for example, explain this by suggesting that regulation acts as a symbolic and rhetorical resource, pushing organizations into “gestures of compliance” via expansion of their own self-regulatory abilities<sup>10</sup> which are then in turn legitimated by the courts.

If regulatory roles are poorly understood, this may link to some changes occurring in law and legal practices, and the next part briefly reviews two such theses which may be apposite here.

#### Recent ideas on the ways that modes of regulation are changing

Murphy - in a concerning argument for many institutionalists - argues that law, once a ‘unifying constitutive principle of society’ (1997:35) is now increasingly marginal and merely one of a number of networks or matrices which comprise the new disparate and dispersed ways in which government operates. Murphy suggests the old idea of law and conformity to legal rules acted as an image of order, both legitimating the diverse modes in which power was applied, and providing an ‘ideal representation of social identity and truth’, focusing on the individual and the individual’s responsibilities, and against which individual experiences could be set (Goodrich, 1998:487). Instead, Murphy claims, this ideal is being displaced by new empirical systems of social ordering which are independent of ethical criteria and by institutions based on economics, statistics, and governance through audits (Goodrich, 1998: 484 and 479), in a society based on ‘networks, grids, transmissions and flows of energy and information’. Social processes, he claims, are increasingly managed using numerical indices of profit and loss, and by the manipulation of systems of communication, rather than governed by legal processes. Old expectations that individuals should both know the law and obey it are giving way to new expectations of behaviour and new forms of ‘reasonableness’. In this new world, he asserts, it is statistical and other interpretations of data, and a respect for other power systems, rather than mere legal authority per se, that persuade: there is a ‘new numerical empiricism.’ And alongside this, regulation is shifting, with increasing proceduralisation, from a checking of states of affairs, to a checking of the dutifulness and suitability of the people associated with frequently changing rule systems, often deriving, not from the legislature, but from lower sources of power.

Such arguments are highly relevant to the projects which are the subject of this thesis, for they attempt to introduce a new way of making firms more efficient and less harmful to others in society,

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<sup>10</sup> Whilst I find arguments about the voluntary embracing of new norms in a variety of situations interesting and generally fairly persuasive, in fact I disagree with aspects of these writings concerning the implementation of new regulations, which fly in the face of a prospering legal profession - and do not explain satisfactorily to me why such phenomena are not applicable to all areas of law. It may be that causality works the other way, that strong organizations lobby before legislation is made, weakening and softening it to suit their own purposes, lobby again as it is introduced, and choose ‘not to understand’ if given the chance (see Kane 1993:182). On this view they do not ‘strive to construct rational responses to law’ (Edelman et al p. 406): they strive to create weak laws. They are then often powerful enough to normalise the view that firms need not make the (originally sought-for) changes but to do something related instead and are sometimes assisted because of poor levels of knowledge by some regulators or low priority given to implementation. There may be other influences at work in the circumstances described by Edelman et al., including cultural attitudes to state power and its value in U.S., and, relevant here, the activities trade associations and sellers of services introducing ideas which are beneficial to themselves and certain subgroups within organizations.

via the auditing of their material throughput, and setting up systems of continuing measurement, rather than by using more traditional techniques involving visits by regulators with the threat of force (in the form of prosecution).

Crawford's concern is narrower, the rise of what he calls 'contractual governance', focused on prevention. In this, private arrangements are set up with parties seen as potentially non-compliant, so as to enable greater monitoring and prevent problems. He calls this 'regulated self-regulation' for the state assists and sets up these contract-like arrangements. Whilst his subject is crime prevention not prevention of pollution, if one substitutes 'untoward pollution creation' and 'polluting firm' for 'crime' and 'criminal', these ideas do have resonance with what is occurring in environmental voluntary regulation. He points out, *inter alia*, that the new regimes premised on prevention avoid discourses around the morality of the undesired behaviours and presume that socially harmful activities stem from mere choices. The matter is seen as technical, not culpable, for - astoundingly - all rational actors are seen as capable of making such choices and are thus appropriate subjects for intervention (2003:484-7). As rule-breaking is not seen as linked to pathology, its control does not need specialist expertise. Instead, such roles can be passed, in "a new corporate approach", to a mix of organizations in preventative partnerships where proactive and informal processes are deployed. These new approaches, he argues, have an instrumentalist mentality which emphasises harm minimisation, rather like an insurance process (2003:486). This too has resonances with the choices of, and attitudes to, the participants and their routine practices in the initiatives studied here.

These disparate expectations set up in the literature concerning voluntary regulatory changes, when rule-following is a major concept of many versions of the theory and at a time of experiments into new regulatory forms, make it potentially very interesting to use institutionalist theory to explore the situation here, where state regulators advanced a voluntarist approach to effect change alongside other intermediaries from private firms. The final section of this review examines possible ways of linking and entwining some of the common themes discussed above in the short term projects here: first, a construct which will enable several parties to what occurred in the clubs to be classified in the same way.

### The roles of intermediaries in voluntary regulation

In a commentary on the deregulation phenomenon in the *Yale Journal on Regulation* (1988:427-442), Richard D. Cudahy drew attention to the 'army of middlemen sustained by the folklore of deregulation' comprising in particular, 'middlemen and consultants and advertising people of every sort'. He pointed out that whilst deregulation seemed to promise savings on labour, there were in fact great opportunities for employment for those 'who arranged trades and made deals' - so that this group benefited and flourished in the very processes in which firms were, in the name of efficiency, laying off formal members of the workforce such as clerks and technicians. Similarly, he

argued that deregulatory actions also gave employment opportunities to those providing courses, conferences and seminars on the changes and where the providers were consultancies they might also profit from marketing their skills to participants. Linked to this, he pointed out that deregulation was, of course, profitable for providers of information and literature about deregulation, which (neatly) often reported on the very same conferences and seminars which consultancies were providing and which might sometimes be written by them. The deregulation agenda was also profitable for advertising firms. A parallel case might be made that there were similar people, ignored by much of the literature, who have been able to profit from voluntary regulatory initiatives, especially those which are dependent on grants in order to run. Rena Steinzor, for example, makes reference to the 'consultants who earn their living by implementing EPA initiatives' (Steinzor 1998:146) yet the general literature on voluntary regulation is largely silent about their role and their contribution to costs and results.

General consultancy is one of the near invisible features of modern policy formation and regulation. The input of consultants is disregarded and yet regarded as the norm, in ways which Mary Douglas would understand. Consultancies which have good and ongoing relationships with official policy makers are, for example, likely to be in a particularly strong position to influence the policies that are constructed. The role of consultants in relation to institutional change is especially interesting, for they have been at the forefront of spreading ideas of market reform. Consultancies are rarely mentioned as such in papers on institutional change, and their role in firms seems rarely to be acknowledged there; yet the themes are of norms, discourses and values providing stability, but subject to change. The formal organization is conceived in some of the writing to be so entrenched that it can be described as 'packaged social technology' (Jepperson 1991:147) yet these intermediaries with their new ideas who are not part of this package are hired readily in the expectation that they will bring change to the interstices of the organization and then leave. It is curious that the hiring of new 'voices' to bring about changes in firms to make them more profitable is not a more marked feature of institutional writing.

Cudahy (1988:436-440) specifically mentions the categories of deal arrangers, seminar givers, and those who gained from writing about the seminars, from writing about the discourses and debates expressed in the seminars, and those who found work advising on and helping put into practice the ideas propounded in the seminars. The people who worked on waste management clubs might be seen in the same terms - the people who set up the grants, those who arranged seminars and courses, who gave advice to member firms on how they might increase their resource efficiency, who wrote about the development of such 'greening' projects, and aimed to gain subsequent work from firms taking on the ideas proven to be profitable by those projects. Yet the reports of the clubs rarely highlight these people or their fees. It was sometimes consultants who suggested that initiatives should be run in new areas, who helped to form the partnerships which ran the initiatives, who arranged recruitment, and, after the clubs had been in operation, made claims about their achievements and suggested that further clubs should be established in further new areas and themselves worked to bring this about. (As will be shown, this was true of both of the case study

clubs). There were intermediaries from many types of organization involved in the partnerships, with a range of job titles and from a variety of backgrounds, and they are termed in this thesis 'folk' (derived from Cudahy's title) to underline this variability: not all were formally styled as consultants and in fact their practical activities as intermediaries varied; often their job titles chopped and changed as they moved posts. Some, after early involvement, went on to develop new clubs of their own, and to run them and perform in much the same way as the earlier national consultancies, making claims about the successes within the clubs with which they were involved. There are a few other strands of the literature which have touched on the roles of intermediaries in forms of voluntary regulation. Greenwood, Suddaby and Hinings (2002) in a study of the role of professional associations in a fairly unified organizational field noted how they attempted to manage debate, setting out what should be considered the problems of concern, and expressing these concerns in distinctive and overtly simple ways in new narratives, of what new practices should be set up and justifying and explaining outcomes. Greenwood *et al* argue, not entirely convincingly, that to manage the debate in this way is essentially to act as regulatory agents. Whilst it has some regulatory aspects, this strays far from normal meanings; (indeed, such arguments might make George Galloway or the Letter's Page Editor of the Observer into regulators). They point out that such behaviour can (but does not necessarily) lead to new ideas being diffused and embedded across an organizational field. Certain other professionals are also reported as expanding their working roles to take on new, quasi-regulatory functions. In the U.S. a conference on '*The Emerging Role of Associations as Mentors*' (NFDEE, 2000) highlighted the work of trade associations in voluntary self-regulatory initiatives and their new pride in being instrumental in encouraging high standards in such self-regulation.

In relation to the changing formal regulatory agenda, Janet Gilboy has explored (1998) the situation where third parties are required to take on certain regulatory roles. She found that the different norms and ways of acting in a regulatory mode created difficulties and contradictions for these new players, who were often unenthusiastic about their involvement, but because the legal system and its interpretation and meaning was regarded as a given, there was no exploration of why this was so. The approach to these parties - who were in fact intrinsic to the processes which were going on - was to see them (in as much as they were seen) as predictable, wooden figures, who could be assumed to fit into the pre-existing ways of acting and understanding, and their own cultural contexts and professional and aspirational concerns ignored. I believe that the intermediaries' roles in the waste management clubs were regarded in a similar light.

Clemens and Cook (1999:456-7<sup>11</sup>) make a general point concerning alignments where some third parties develop financial interests in the continuance of a government policy or practice and the mutual needs of the parties 'lock in' patterns of behaviour. They note that 'embedding a proposed program in an array of supportive constituencies' may be necessary for its success and speak of 'entangling alliances' where

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<sup>11</sup> (citing Howard 1997, McCaffey 1997, Laumann and Knoke 1987, Skocpol 1996 and Pierson 1994)

“Instrumental rationality and constitutive identities reinforce one another”.

They cite Padgett and Ansell (1993:1259-60) in support:

“rules induce roles, which induce interests, which induce strategic exchanges, which lock in patterns of collective action that depend on the rules.”

Having introduced the idea of ‘folk’, and considered writings concerning such activity within the new institutionalist literature, it is argued that to examine the role of intermediaries within these initiatives will be useful, not only in pointing up an unexplored area, but as part of the extension of new institutionalist research into the work world of projects; this may be particularly testing of concepts where projects entail the confluence of a number of organizational fields. The work of intermediaries on voluntary projects promoted by government might, for example, bring significant benefits for a type of service industry (in this case those advising on greening of industry). The argument now considers more fully questions regarding the role of intermediaries in relation to changing modes of regulation, this is followed first by a consideration of the general potential of intermediaries to take on different roles, and then by a discussion of their possible roles regarding emergent organizational fields.

#### Regulatory roles in voluntary initiatives

Within the waste minimisation clubs, at the local level, it was relatively common for regulators to be involved. Their roles were, whilst not unusual, somewhat at variance with a good deal of the literature on what it is appropriate for regulators to do. They promoted greening, not by carrying out inspections or enforcement, but by obtaining grants, running seminars or setting up websites, writing reports on successful projects and trying to tempt representatives of firms to attend seminars and to take on some of the ideas. Here they were, in a proactive role, taking on the tasks of encouraging the voluntary ‘greening’ of industry in a context where the prime voiced incentive for the firm’s participation was financial. As commercial intermediaries also moved into advice on voluntary regulation, there was, as it were, a certain criss-crossing of roles, and moving into spaces previously occupied by distinct professional groups.

Formal regulatory agencies are, of course, middlemen of a sort. They, too, act as intermediaries, conveying the requirements of government to regulatee firms (but generally alongside this activity proffering the possibility of force should their audiences not prioritise these requirements sufficiently well). They can be seen as important in confirming and reinforcing prevailing logics - especially those logics preferred by the state, and making apparent the degree of non-mimetic behaviour that is tolerated in a particular social setting. By their monitoring of what are the prevailing norms of behaviour and the ways that they vary, their negotiations and inputs, and occasional enforcement, they “enable the formation and reproduction of shared meanings and understandings” (Greenwood, Suddaby and Hinings 2002:61). Some authors stress the negotiation and discussion aspects of regulatory work, where there are activities such as explaining, coaxing, translating requirements into everyday terms or providing similes to make the new behaviours acceptable to entrenched ways of thinking. Black, for example, (2002) highlights the importance of

conversationalist approaches, as Gouldson (2002) does the processes involved in securing co-operation. In this view it is not inappropriate for regulators to engage in persuasion and promotion in proactive work, for their more normal roles involve a kind of teaching of what is considered the best practice that is achievable, of translation of regulatory requirements into the circumstances and understandings of the firms concerned, and allowing both time for change to occur, and for some variance from stipulated behaviour. In this view, voluntary regulation becomes not something strange and foreign to normal modes, but a mere extension of them, using specialist skills. (Dimento, 1999; Farber 1999; Fineman, 1998; Kane, 1993, Viscusi and Zeckhauser 1979).

Voluntarism implies a spectrum of acceptable standards for different circumstances; it entails the relaying of appropriate and acceptable information and the agreement to the modes of assessment to be used. Its current styles also involve considerable liaison and partnership work. If some aspects of the role of regulation are now perceived to be opening out, and becoming more advisory, involving more liaison and co-ordination, it is not remarkable that other occupational groups, already working with regulatee firms, should perceive that their own skills might be very appropriate to such tasks. This would be especially the case where policy changes have led to occupational groups being faced with finding new markets for their skills, and scouting about for possible ways to enlarge their repertoires. [It also links to possible new modes of operation for norms and rules in terms of the operation of institutions in a society of frequently changing roles and identities (Sen, 2001)].

The potential of this type of activity by neo-regulators has not been explored to any extent in the regulatory literature although work by Mashaw at Yale is considering the implications of contracting out regulatory work such as inspections to private firms in changing the nature of professional expertise in regulation. Ayres and Braithwaite (1992) are concerned with the opening out of regulation, but their focus has been on ending secrecy in dyadic, inspectorial situations by opening the process to public interest groups, not the displacement of regulators from aspects of their role. The notion that the inclusion of such third parties is valuable has led, for example, to several studies of the roles of NGOs in regulation (Bendell, 2000)<sup>12</sup>. Similarly, Stigler's concept of the revolving door is simple - the regulator has the possibility of exchanging places with the regulatee, stepping into the other's shoes and values, and this future possibility makes 'capture' very likely. But if aspects of the regulatory role do indeed expand to new groups, such a 'door' is replaced in this new world of different, and less excoriating contacts with firms, by veritable corridors of possible doors, with possible exchanges of large parts of the regulatory role with academics, consultancies, business advisers, etc.<sup>13</sup> but only - and here the argument connects intimately to the evidence in support - if voluntary environmental initiatives prove a worthwhile endeavour in policy terms. If it is found that intermediaries have been significant in running the clubs, a second question concerns the extent to

<sup>12</sup> but there are further questions in considering the crossover between campaigning NGOs and consultancies, and the industry of authoring.

<sup>13</sup> In fact, one of the striking things that I found in my researches into waste management clubs, was how those involved in one project were often transposed into new roles on another, and another.

which they may be said to have shaped what occurred and a third concerns the attitudes they display in regard to roles previously more associated with regulators.

Having considered the potential for intermediaries to influence voluntary regulation and to take on regulatory roles, the argument now turns to consider how easily intermediaries may change their roles.

### **Shape shifting**

Institutional roles may be assigned on a long term basis; increasingly it appears that some in modern economies may exchange roles relatively easily. Intermediaries are not a defined group, and this is important. In fact it may be the point. The consultancy role, for example, can be taken up by many within existing professions - they can freely step out from their roles within established organizations, (or be ejected from them) and, provided they have necessary constitutive attributes such as professional skills of some kind and perceived abilities, place themselves on the market and become able to influence and shape what occurs within other organizations. Whether there is success in this or not will depend on numerous factors, but it is true to say that any reader of this document could become a consultant, just by adopting that role (and might already be one). Their social power, of course, would vary considerably. The facilitation role from outside organizations and persons is threaded through our institutions, but we do not notice them. As Sen has pointed out, (2001) we have today multiple allegiances, multiple identities. Many of us can move in and out of institutional modes freely and intelligently. In doing this, we are not noticed in the categories of major modes of thinking. This thesis attempts to 'place' the intermediaries in their temporary projects in terms relating to institutional theory; it is possible that this 'shape-shifting' characteristic is particularly apposite as fitting the repertoires of temporary endeavours generally. The next sub-section turns to writing which links some of the above categories.

### **The roles of intermediaries in relation to emerging fields**

Suchman has explored the work of intermediaries in the creation of new organizational fields; he studied the work of law firms as intermediaries assisting in the creation of Silicon Valley. His findings appear potentially useful for considering the activities of the intermediaries who set up and ran the initiatives here. The lawyers he studied acted as 'missionary educators' (Suchman 2000:87), making claims to encourage involvement and to introduce their client entrepreneurs to a new view of seeing the world, and an acceptance of the new norms that were developing in the emerging organizational field. (This has parallels with the assertions made about the effects of waste minimisation systems for firms). They also linked their clients to sources of funding, and explained the rationale of those giving funds. Thirdly, through their frequent contacts with many clients they came to have an overview of what were common ways of dealing with problems in the rapidly developing field and what was likely to succeed. As they built up trust they were able to use their 'broad vicarious experience base' (Suchman 2000:83) and their standing, not only to give legal advice but to advise their clients on what strategies were advisable; i.e. they had a hand in shaping what became acceptable behaviour, and in the standardisation of routines and norms, even though they were subject at the same time to other pressures.

The effectiveness of claims-makers in attempting to convince, depends in part upon their perceived trustworthiness and their possession of other values which would confer status by the targeted group. They may also, in turn, be subject to the claims-making of counter-narratives, suggesting that they do not have the qualities they claim, or that the facts that they report about are not in fact true or not significant. This links to the literature which explores processes of legitimization (for example Aldrich 2000:216; Suchman, 1995). DeJean, Gond and Leca (2004) use the ideas of Ted Porter and others, and suggest that the deployment of measurement systems in claims - as was used heavily in the clubs - is one tactic to create legitimacy, linking as it does to existing respected cognitive values. Such tactics may not only grant considerable systemic power to some actors, but may help to create new disciplinary systems, and also obscure other aspects of the power systems of the new systems (2004:745-6).

#### Viewing claims-making in terms of 'Accounts'

Researches on legitimacy-seeking are interesting but can very soon become circular: if the premise is that legitimacy is obtained when certain values are held, displayed and embraced, and evidence is presented that this is the case, one can only accept the argument. It is difficult to get behind the assertions. Another approach to culturally constructed statements, which seems to have more scope for critical analysis, whilst also concerned with attempts at legitimization, is the idea of 'Accounts'.<sup>14</sup> They have been defined as

“A coherent body of reasons and evaluations that can be used to explain and legitimate some practice or activity” (Healy , 2004:308)

These ways of viewing - often found in promotional materials, professional handbooks or in writings about a topic in the media - do not necessarily give the whole story. They

“fabricate an understanding that the speaker believes will be regarded, first of all, as reasonable, and secondly, as being compatible with certain widely shared background expectations. Accounts are thus an indication of what people believe to be socially acceptable and desirable.” (Wuthnow, 1996:94-95)

They relate to two levels, the individual and the social. Linking to writing by Berger and Luckman and by Giddens, they encapsulate that process in which each person/speaker subjectively sets their own behaviour against a socially constructed definition of reality, monitoring their actions against the perceived circumstances, in an ongoing process of constructing and reconstructing socially acceptable explanations for what they are doing. Wuthnow (1996:93) describes them as

“things that people say to other people or to themselves to explain what they are doing.”

Scott and Lyman (1968:47) say, more formally, that an Account is

“a linguistic device employed whenever an action is subjected to evaluative inquiry.”

Healy argues convincingly that Accounts can become prescriptive rather than descriptive, presenting an ideal experience, rather than a strict compilation of actual experiences. This seems likely to be the case here, when the topic was formally designated a 'best practice' project. The construct therefore allows assertions and claims to be examined in three ways, as faithfully describing lived experiences or

<sup>14</sup> It also avoids the need to show distinct narratives or particular rhetorics.

not, as presenting valued social constructs linking to desired new or existing norms, and as linking to the particular circumstances of the speakers or writers (and thus also allows for alternative Accounts).

### Institutional theory and projects

This review has considered the suitability of institutionalist theory to analyse what occurred in the clubs; its last point is the most radical. Whilst those engaged on the clubs may have had the intention to establish a permanent field of activity promoting pollution prevention prominently alongside - or displacing - other forms of environmental consultancy, in practice the clubs were projects, most lasting for 3 years or less. The proponents of the new system thus had a very short time to influence and displace what institutionalist theory suggests were long-established practices, norms and ways of thought in particular industries. For many of those involved, short-term projects with differing forms of funding were already a way of life; it is almost true to say that the greening of business in Britain *is* projects. This is in contrast to the concerns of much research using institutional constructs which continues to focus on long, slow change to established, taken-for-granted orders.

Powell has begun to explore new forms of work in the light of the institutionalist literature. He points out that the project-based form of work is sweeping across many insecure industries as a nascent 'new logic of organizing', in which 'jobs disappear and projects ascend' and the boundaries of organizations become 'so porous that to focus on boundaries means only to see trees in a forest of interorganizational relations'. He describes these forms as being coupled with a newly emerging institutional infrastructure in which consulting firms, amongst others are 'potent carriers of these new recipes.' (2001:11-12) These are, as he presents them, exciting and important developments which should be recognised and explored.

Yet is it a valid use of institutionalist constructs to use them for short-term activity? The norms of usage for the theory, as it were, might be said to be contravened if its use was extended into this type of situation. The boundaries of theories are not set, however, and whilst a theory may become less useful in certain situations, there is no rule preventing bricolage (in the sense of extension of the discourse and ideas from one accepted social usage onto another). I propose to use the concepts above to explore the use of institutionalist ideas 'at the edges' of its normal domain. I justify this with four reasons: first, that projects are now an ubiquitous form in our institutional context and it is important to analyse them. Second, there is already evidence of papers which nudge into considering the short-term. Thirdly, there is no other theory which can adequately explore the ways in which values and established practices affect projects and the acceptability of new ideas. Finally, it is possible, of course, that this attempt will point up a severe limitation of institutionalist theory - it is incapable of dealing adequately with the exploration of what occurs in short-term projects or the changing landscapes which support them - but if so, this is an important limitation to the theory and should, for this reason, be examined.

### Interim conclusions from the review of the literature

This discussion of current institutionalist thinking suggests that a number of constructs and ideas are very apposite to the issues of concern here and there does seem to be the potential, if evidence gained about the initiatives is considered in terms of the constructs discussed, to gain a greater and more satisfactory understanding of what has occurred. Yet, whilst having potential to provide rewarding insights on the scenario to be explored here the theory is not perfect for the task. The literature trails; there are enticing clusters and nodes where many theoretical conclusions about mechanisms and behaviours cohere, but amongst these greater certainties there are other areas where differing schools of institutionalism have rather conflicting stories to tell, and yet others which are not well-investigated and where matters are still poorly understood. There is currently a great deal of interest in the notion of change to organizational fields; the scenario here is of attempted change to value systems and practices within numerous organizational fields, involving personnel from other fields in the interventions, working within the organizational form of best practice projects, and involving both regulatory aspects and some evidence suggesting bricolage, and the outcomes to that attempted change still cannot be described as positive. There is clearly a need to cross-check the findings of the Di Maggio thesis concerning the effects on fields of state interventions. There is another to enquire if the happenings can be classified in terms of organizational field change or emergence. But if there are no clear signs of new field formation, how are the occurrences to be examined, given the careful and layered complexities of the literatures? This thesis will argue that the notion of 'middlemen' or 'intermediaries', working on one project after another, is useful in unravelling and setting out what occurred in terms of institutional categories, notwithstanding the fact that this is a category which includes parties from varied organizational backgrounds. It will explore aspects of their rather anomalous normative positions: their presentation of 'Accounts' - a mix of claims and justifications - about the initiatives, evidence of contention that their activities engendered, and the way that their role and their claims were monitored and regulated. It will be suggested that their activities can be seen as relating to the ongoing life of the organizational fields which form their setting, and as shaped and constrained by the practices and strategies of their employing organizations and the temporary organizational arrangements of projects.

This endeavour to understand in theoretical terms what occurred begins in the next chapter with the setting up of a methodological approach capable of collecting evidence of the various intermediaries and their projects, which can be analysed in relation to these constructs of interest.

## **Chapter 4. Analytical framework and research strategy**

Chapter One described the background to these voluntary initiatives which promoted resource efficiency in British firms and gave an overview of the thesis; the second chapter retailed a history of the projects set against the policy context of the time, and reviewed previous assessments and evaluations of the initiatives. The literature review on aspects of institutional theory concluded that to investigate the matter from this perspective would enable examination of the way the prioritisation of these activities was played out against the diverse norms and practices of those involved. In particular, because the project form appeared to be important in what occurred, it was suggested that it would be worthwhile to test the use of institutional constructs - normally used for much more enduring entities - by considering the usefulness of their deployment on this way of organizing work activities. The review also highlighted the potential influence of middlemen, or intermediaries, in situations of institutional change or attempted change. This chapter takes these matters forward by considering first, how concepts and ideas from institutional theory are to be deployed to form the analytic framework for this study, setting out the central questions of concern. In the second part of the chapter the research methods to be deployed are described, their potential limitations are discussed and the strategy to answer the research questions is explained.

### **The conceptual framework and research questions**

Various factors contributed to the research focus and approach, not least the wish to understand better the regulatory aspects of what occurred. Reading of the voluntary regulatory literature<sup>1</sup> led to the initial observations that voluntary regulation tends to be under-theorized and it was surmised that if it was construed in institutional terms (as attempts to supplant and shape norms and self-regulatory systems within groupings which already operated under well-established and often unconscious normative systems) there would be a more telling and cautious understanding of such interventions. Such attempts at deliberate but non-coercive norm creation, using systems of rules foreign to the day-to-day practices of most of the parties, and involving alterations to regulatory roles and local power systems, might be seen as change ploys set against the kinds of established patterns of inter-group behaviour and systems to preserve dominance observed by Fligstein (1998). Thus they might be expected to set off resentments, contention, bricolage and new power alignments, rather than being mere benign mechanisms bringing short-term economic advantage. Such a way of understanding was a difficult one to explore and test, and it was decided to focus the empirical research on one set of parties, particularly instrumental in bringing about change, and subject to numerous rule-sets, the intermediaries.

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<sup>1</sup> briefly summarised in Chapter 1.

### The research focus

In contrast to the earlier evaluations of the clubs which focused very much on the short-term outcomes of the voluntary initiatives, the focus of this thesis is the various intermediaries who set them up, worked on them and made claims about them, and the repertoires of activities which they used and to which they were largely subject. The aim of their work on the clubs was to attempt to change values and governance systems whilst they in turn were subject to a mix of values and governance systems, particularly the need to get funding for their portfolios of projects and recognition for their activities. The thesis considers the theoretical significance of these 'folk' who were both 'between' and on the margins of the normative systems they were seeking to influence.

To use metaphor to emphasise this point, it is as if, in using a light, the point of focus moves away from the initiatives *per se*, falling instead at a different focal length, at the level of the intermediaries who encouraged, facilitated, sometimes ran, and reported back on them. The empirical research aims to understand aspects of *their* life-worlds - the institutional settings of their parent organizations which created varied drivers for involvement with such initiatives, the ethical construction which individual people working as intermediaries placed on what they did, the pressures they faced, and the contention which sometimes resulted. In the empirical research matters relating to the success, or other features of the initiatives are viewed only to learn more about the intermediaries, for example, how those who participated heard and interpreted claims from the intermediaries and how they reported that they were, or were not, influenced by those claims. The research explores how, over five years when the clubs were popular, the involvement of the intermediaries worked, and how it fitted - or not - alongside the demands and declared strategies of their 'parent' organizations, and in particular the governance systems that were operating.

In fact, the decision to focus on the intermediaries only came after the case studies had begun. It was surmised that improved networking would be an important benefit for participant firms; a question about this was included in the set for the semi-structured interviews, and for consistency this question was included in all interviews held. Remarkably, few participant firms acknowledged any benefit but some intermediaries were vigorous in praising the projects for bringing this about; this was the first sign that what had appeared a diverse set from many different organizations, brought together only for the running of a partnership project, actually had seemingly shared characteristics other than those of getting the aims of the particular project being studied fulfilled.

It is argued that exploring these aspects of what happened with this focus, looking, as it were 'behind the scenes' of formal voluntary projects, showing the interplay of varied institutional settings, constructions, expectations and routines on one set of parties - and there are very few such studies of the settings of voluntary regulation - will contribute to a clearer understanding of this type of intervention, revealing unanticipated pitfalls and implications for policy and research.

### The research themes

Four themes are taken up, each relating to a different part of the institutionalist literature. The first theme concerns claims-making and the way that 'Accounts'<sup>2</sup> of what occurred and should occur in the clubs were used by intermediaries, and how the dominant Accounts shaped behaviours and curiosity quite rigidly whereas the existence of subservient, rival Accounts, linked to experience of contention and bricolage, was largely unvoiced and disregarded. The second theme relates to ways in which the activities of the intermediaries working in projects might be construed in terms of the category 'organizational field'. There were interesting regulatory aspects to the initiatives, for, whilst the initiatives were, in effect, attempted disturbances to operative regulatory cultures, the intermediaries themselves operated within arenas where several rule systems were in operation concurrently. The regulatory roles, too, in regard to the projects had confusing aspects (for several parties appeared to hold elements of such roles concurrently, and there was, to use an expression of Abbott (1988:59-85) imprecision of jurisdictional boundaries). The third theme focuses on matters relating to bricolage as a response to the range of rules and norms in such situations, and how it might link to writings on developing modes of regulation.

The fourth theme refers to a general preferencing of interest towards dynamic and relational activity and to the development of contention, voiced or unvoiced. It is concerned with evidence of mechanisms, particularly those concerning the development of contention in the initiatives. It was noticed that the elements here had strong similarities to scenarios studied by McAdam et al (2001) [discussed below]. They championed particular modes of exploring the development of contention within any system of formal institutionalized power (2001:343-4) so as to reveal replicable explanatory mechanisms. Their approach considered, *inter alia*, factors such as brokerage, diffusion, and the role of normative changes in setting off changed perceptions of identities and tasks. All are relevant to the subject here. Accordingly, the research approach is to involve the exploration and setting out of the evidence, as far as possible, in ways that treat social interactions and relational processes in general as "active sites of creation and change" (2001:22-3). The aim is to show social and historical context, delineating the dynamics of changes by demonstrating, where possible, the ways the new interventions interlinked with or disturbed routines and created contention in various forms. Contention, particularly unvoiced or deviant contention, takes a back seat, as it were, in a great deal of institutional writing, giving, it might be considered, a misleading impression of social conformity and harmony<sup>3</sup> and downplaying the jostling, disbelief of claims and resentments found in most social life. The subject here gives an opportunity to show its occurrence in (voluntary) attempted change processes.

Having explained this focus and the angles of intermediary involvement to be explored, the next parts describe first, the way that the quality of the secondary evidence shaped the methodology,

<sup>2</sup> A capital letter is used here for the term 'Account' when it is used with the distinct theoretical meaning explained in the literature review.

<sup>3</sup> Sometimes the 'problem' of the agency of entrepreneurial activity seems to arise because it is set against such a picture of accord and normative unity.

and the choice of a qualitative approach, then the linking of intermediaries to projects, and then the reasons for the use of the narrative form and a more detailed explanation for the interest in the development of contention. The research questions addressed in the empirical investigations are then presented in relation to the themes of the research and the staged approach to be used for answering these questions explained. Issues regarding the execution of the method and the analysis of data are addressed in the final part of the chapter.

#### **Influences shaping the methodological approach**

The quality and availability of evidence has shaped the methodological approach. As this is a study of an interim situation over 5 years where long-term outcomes are not known, it can present a narrative of what occurred but it cannot present a complete history. Many studies using the construct of organizational fields are lengthy examinations relying on data sets covering decades; this was not possible here. Most dauntingly, there was an inescapable paucity of reliable figures for many parameters. The findings of the researchers carrying out the Envirowise and Environment Agency overview evaluations, and also work from University College Northampton, show that these gaps in the data cannot be remedied by further researches, for they arise because at the material time, many parameters were never measured and relevant data was not recorded. Sometimes this stemmed from concern for commercial confidentiality regarding the participant firms, or the cost or inconvenience of taking measures; in other cases initiatives had been abandoned or ended without record, and the parties who knew about them dispersed, even within a couple of years of their ending. This precluded any accurate quantitative study of the clubs as a whole and made any overview study of their characteristics very difficult. Further, these gaps, and the inability to gain access to the minutes of the management arrangements between ETBPP/Envirowise and the departments, for example, directly excluded the use of agency theory to analyse what occurred.

Yet in other ways, the existence of the gaps was itself evidence and helped to firmly structure and focus the research. It raised questions about collective attitudes and purposes amongst those who bore with discrepancies and missing data, and why this was. Use of institutionalist theory to organize and analyse data collected could enable better understanding of how these gaps came to be accepted and suggest possible reasons for their existence. A qualitative, ethnographic research approach might enable an exploratory examination of the processes that were ongoing and how the intermediaries themselves made sense of their activities within the organizations and other organizational forms within which they worked. Participant observation, where the researcher interacts with and even collaborates with the object of study (Cresswell 1994:6), whilst presenting some problems (discussed below) might be expected to facilitate understanding of the objects of study.

Qualitative research is noted for its capacity for uncovering unanticipated findings and revealing new interconnections and understandings of social reality. Miles and Huberman note that, besides the vivid, convincing quality of qualitative studies,

"they help researchers to get beyond initial conceptions and to generate or revise conceptual frameworks." (1984:1)

Qualitative methods, however, are subject to concerns: there is no way of being absolutely certain that sampling strategies are adequate, nor that researcher bias has not distorted the conclusions drawn. One can, however, without straying outside that method, act to minimise its flaws by gathering data from several locations and collecting it on a different basis; this need not, but is likely to strengthen (or destroy) findings by providing other descriptors in a larger explanatory framework. The strategy to minimise bias and to make explicit the sampling strategies used, is set out in the methodology section below.

The research is considered exploratory because there have been very few studies focusing on intermediaries working in this way in regard to voluntary regulatory initiatives, and it is not clear how they, using the project mode of organizing, should be conceptualised theoretically. Some 'third parties' have been deemed to follow particular roles in some theoretical writings - for example, trade associations have been described as acting in regulatory roles, almost without qualification - and it is possible that this may have been unwittingly inaccurate, for there are dissimilar functions comprising those roles. It may be that the use of the project form is crucial to understanding what was occurring. It is argued here that there is a need to explore the phenomenon of 'folk' as they work with projects in more detail in trying to place them within the pantheon of institutional theory and the next paragraphs explain this in more detail.

### Projects and Institutional thinking

Groups operating projects and participating in them can come from many organizational fields, although this was not necessarily the case with the waste minimisation clubs. This new way of organizing work activities is interesting, not least because often the rationales associated with this type of intervention rather undercut the assumptions of some forms of institutional analysis, that values and practices are generally built up slowly.

What did the project form (especially the best practice project form) contribute here and how can it be construed in terms of institutional theory? To examine this, the intermediaries here are treated as if they were always working using the project form, so that both constructs can be investigated as coincident. (This is not the case for all, but describes the great majority of instances). The options considered are:

- construing the mode of organizing for projects as constituting its own organizational field (following the line of approach taken in Fligstein 2001).
- construing the projects, and the actions of the intermediaries within them, as part of an emerging field promoting greening of industry by preventative measures and clean technology. (This follows the line of argument given by DiMaggio (1983), who found that the unintended effect of voluntary measures he observed was the strengthening of an emergent field of organisers, handling grants for an industry based on artistic skill, where the apparent intent was to support those actually with artistic skills, not middlemen with managerial skills.)
- construing the role of intermediaries in projects as commensals operating permanently alongside the fluid patterns of changing organizational fields in providing boundary objects (information, claims and contentious challenges) which if used, would have the effect of changing routines within fields, and only a

proportion of which would be expected to be taken up, so that there is continuous turmoil, or creation of 'fashions' as the 'folk' constantly slightly change the boundary objects they proffer. (Following, (and 'bricolaging' from) lines of argument in Czarniawska and Sevon, 1996, Fligstein 1998b, McAdam, Tarrow and Tilly, 2001 and Bowker and Star, 2000.)

#### Further factors influencing the research design

The design of the study has been shaped by two further factors. First, the mode of setting out the findings has been shaped by the argument of Tilly (8.9.05) that social scientists should attempt to present their results as a readable narrative, consistent with truth and accuracy - 'courting' their readers by using terms already understood by their audiences and not using technical accounts except where unavoidable. This has been attempted in several of the chapters.

Second, the approach, (and fourth theme) has been shaped by an innovative development linking institutional theory with a major new approach from the literature on social movements (McAdam, Tarrow and Tilly, 2001). The new ideas introduced have the potential to shake much institutional analysis - which can have a 'cardboard' quality in its concerns for structural isomorphism and legitimacy and its avoidance of grievances and countercurrents - and create an intellectual climate which demands that more attention be paid to cultural settings, to interactions and the ways in which peoples' conceptions of their own identities, change both the strength of the nets of their relationships and their conceptions of what is to be done, and what can be claimed, and lead to the development of contention and its consequences.

McAdam, Tarrow and Tilly (2001), in a groundbreaking study "The Dynamics of Contention", examined some scenarios with elements very similar to those observed in these projects - situations where there were interactions between makers of claims and their objects, with a government as party to the claims, and where at least some of the claims-makers' interests would be affected if the claims were realised. They were concerned, as political scientists, to examine episodes of contention by looking at short sequences of events (seeing them, as it were, as discrete units of change) in a dynamic, cultural and relational way, rather than in the more usual 'after the fact' reasoning set out and created using evidence from long histories. They pointed to the importance of understanding the cultural contexts of actions, the webs of relationships in operation (for example, where new groups are emerging and making claims), and the way that peoples' identities are reframed as new relations emerge. They saw these and other factors, such as observed interactions and negotiations, as well as channels for claims, as key to understanding the development of instances of contention - contained or not - and the changes which may result from them. These are elements which seem much more the stuff of real, twenty-first century life with its constant changes and challenges than the current conceptualisations afforded by parts of institutional writing. They argue that:

"Contention is not something peculiar to the realm of politics. It is a generic phenomenon inextricably linked to the establishment of institutionalized power relations. Whether that power is wielded for formal political purposes or other institutional aims - economic, cultural or religious - contention is inevitable."

McAdam et al. suggest that their framework can be "readily adapted to the analysis of contention

within any system of formal institutionalized power" and that

"The generic model only requires that the analyst be able to identify at least one member and one challenger actively engaged in contestation over the shape of a given organizational or institutional field."

They argue that their approach is compatible with institutionalist approaches and point to a number of existing empirical studies from the institutional literature which

"attest to the salience of the same kind of dynamic process and mechanism in the development of contention in a host of such organizational/institutional settings." (all, 2001:342-3)

This claim of compatibility was confirmed in August 1992 when W. Richard Scott and Doug McAdam worked together on a paper presented to the American Sociological Association in which they sketched

"a general analytic framework that draws on recent work from both fields of study."

and suggested that both areas of scholarship might benefit from a synergistic approach. They state specifically

"As the boundaries of single organizations (including movements) and organizational populations become more blurred and permeable, as new forms arise and as new linkages are formed between existing forms, a field-level conception becomes indispensable to tracing the complexities of contemporary changes."

The 'field-level conception' is to be used here in some chapters in examining the role of the intermediaries. Yet the primary purpose of McAdam et al. 2001, was to isolate the mechanisms and processes which preceded changes surrounding episodes of contention so as to provide more certain and more useful evidence of causality. In this case the contention uncovered seems to have been kept privy to certain groups; its full extent and character is therefore not known - it was contained and took the form of rival, or counter-Accounts, a refusal to accept the reasoning presented in the bulk of the reports as valid or some of the practices as acceptable. It is interesting that the formal 'Accounts' had all the provenance which would be expected to confer legitimacy - they came with the blessing of the state via a major scientific organization with the support of the regulator and of respected local organizations. The contention such as it was seems to have represented the voices of those, engaged with the projects in some way themselves, who were dissatisfied with this vaunted legitimacy. In this they echo Stinchcombe's concerns (1997:7-8)<sup>4</sup>, but use the exact converse of his reasoning (which deplored the ready acceptance of display as *bona fide* legitimacy by those currently observing institutions).

Following from McAdam, et al., attempts have been made to explore matters and set out evidence in ways which emphasise relational, dynamic, cultural and contentious issues.

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<sup>4</sup> His concern, and argument was that formal display was never sufficient to confer legitimacy and that real legitimacy for institutional practices [which might be accompanied by forms and rituals] must rest on a moral foundation - he remarks "... the trouble with the new institutionalism is that it does not have the guts of institutions in it." (1997:17)

### **The research questions and the staged approach to be used to answer them**

The central rationale of this research is exploratory and theoretical, to attempt to find some schema enabling the types of occurrences found in the scenarios here to be expressed and understood satisfactorily in terms of institutionalist theory, and to consider the benefits of an institutionalist approach for use for explanations of change attempts via short-term initiatives.

The central research question asks:

**To what extent do constructs from institutional theory prove useful modes of analysing what occurs in voluntarist project-based approaches to government and regulation?**

This is divided into sub-questions organised according to the themes. The first, relational theme, considers how far the construct of 'Accounts' can assist, and the second considers ways that the intermediaries' activities in projects might be construed in relation to changes in organizational fields. The third theme examines such voluntary regulatory initiatives in terms of the construct of bricolage. The fourth theme carries no specific question but implies constant attention to issues relevant to the development of contention within institutional settings and the dynamic and relational issues in what occurs. These themed questions in turn contribute to the answering of two general 'overview' questions, explored in the final discussions of the penultimate and last chapters respectively.

#### **THEME ONE**

**I To what extent does the use of the construct of 'Accounts' assist in understanding the differing claims made in voluntarist, short-term initiatives supported by the state?**

#### **THEME TWO**

**II To what extent does the use of the construct of 'organizational fields' assist in understanding activities in voluntarist, short-term initiatives?**

#### **THEME THREE**

**III How can bricolage revealed regarding voluntary initiatives be construed and understood?**

The final 'overview' questions consider the implications of the research findings as a whole for ideas about the operation of voluntary regulation and for institutionalist theory.

**What implications do these findings have for (i) voluntary regulatory initiatives?  
(ii) Institutionalist theory?**

The answers to these questions are built up cumulatively as the evidence is presented. For conciseness, whilst there is some discussion in each chapter, the penultimate chapter discusses the empirical evidence as a whole, setting the findings in relation to each of the themes.

## **Methodology**

Having established the focus and strategy, this part of the chapter gives details of the practical steps taken to carry out the research before a discussion of the various aspects of the methodology used for data collection and analysis.

In physical terms, there was desk research comprising academic literature, contemporary newspaper and magazine articles, policy documents, promotional documents, technical papers on the practices of waste minimisation and pollution prevention and individual club reports and evaluations. Around a dozen conferences relevant to professionals working on waste minimisation were attended. I sat on the project board of the first case study club for 23 months, attending meetings (usually quarterly), and also visiting some participant firms with the project manager and consultants. During this time I also sat on some national and regional bodies in the Environment Agency concerning the promotion of waste minimisation. For background understanding of issues, in consecutive years I attended three MSc courses at LSE: in environmental economics, management accounting and regulation. Forty-two people were interviewed, not including those contacted for the telephone questionnaire of organizations previously involved in the first case study club.

There is now a consideration of the various approaches used to answer the research questions. First, matters pertinent to the use of a predominantly qualitative approach are explained. The next paragraphs concern the use of case studies and explain how the research has been designed to overcome their drawbacks and potential for bias and the use of a longitudinal check on initial results reported. This is followed by a discussion regarding the use of participant observation, or more precisely, auto-ethnography. The next part explains the strategies used to examine the role of a range of intermediaries, including the use of semi-structured interviews, the way the examples were chose, and the tactic of focusing on 3 interviewees in the universities section. The methods used to reduce and edit the mass of collected data and to create an analysis of the results are then set out. There is then a discussion of ethical issues raised by unexpected counterclaims voiced regarding the value of the initiatives, before a concluding summary.

### **Reasons for the choice of a qualitative approach and its benefits and limitations**

Qualitative approaches to investigating focus on the understandings, intentions and meanings which participants place on events and endeavours, and on the interdependence of different aspects of social situations. Such approaches have drawbacks: whilst greater understanding can be gained of the issues underlying behaviour and some matters may be uncovered serendipitously, the quality of conclusions can be variable. Their usefulness will depend on the sensitivity of the key concepts used to explore the issues. Their validity will depend on the research processes followed and the careful analysis of the data obtained. Findings, for example from a single case study, are not automatically generalisable (Silverman, 2001:248-54). These issues may be ameliorated by, for example, purposive sampling (Patton, 1990:169-81) to seek out situations where theoretical ideas can be tested, e.g. by choosing potentially negative instances of what is being observed. Here, the

following aspects of the research act as a balance to this problem. Two case studies with different characteristics are explored; further, as a follow-up longitudinal study, the participants of one of them (to all intents successful) are asked about the long term effects of their involvement. The later chapters also explore broader entities than the initial case studies (Alasuutari, 1995:156 cited in Silverman 2001:253).

### **The methods used in the case studies**

Case studies were deployed early in the research as it was important to ensure that I understood the subject matter closely, and was not acting on unwarranted assumptions. I wanted to learn, first hand, from the people involved, such matters as what their attitudes were to the projects, what their aims had been, the significance that they attributed to the findings and what they intended to go on to do. At that stage I was uncertain how to classify the secondary data I had about the clubs - which had many seeming inconsistencies and anomalies - nor was the theoretical approach I was to take decided. The case study approach seemed to offer the potential for much greater understanding, enabling access to a great variety of evidence of all kinds and the possibility of uncovering interesting issues which might suggest an avenue of research.

The findings from one case are not necessarily generalisable, for the aim of the case study is to understand the case itself, as a unique series of events with a unique history and circumstances and the meanings that what occurred had for the participants; the priority is internal consistency. The findings of case studies are thus only generalisable to theoretical propositions and not to populations, so that the usefulness of findings depends very much on their internal validity and the skill with which they have been translated into conceptual terms so as to lead to greater understanding. Where conditions are well-defined, however, the use of two or more studies may support external validity if the same constructs are used and if the results for all support certain propositions being considered. The use of two studies, however, if the relevant conditions have been well-defined, and if the results of both studies support certain of the propositions put forward, may support external validity and construct validity. The club chosen as the second case was unusual in ways that I had not anticipated and provided the possibility of what Yin, 1989, has termed analytical generalisation - the findings here were different for reasons that helped to develop the theoretical approach to the subject in unanticipated ways. Quite by chance I had moved from what I came to understand (from later reading and interviews) was a fairly representative example of a club to something which presented some very different aspects of the initiatives although there was some intriguing replication of features, especially as regards the community representatives on the partnerships. This led to a further consideration of the evidence about the second club and the realisation that the intermediaries, in all their various types, played a vital role in shaping what occurred. It should be noted that the evidence gathered was much greater in the first case. As a member of the steering group, and thus a participant observer (Jorgensen 1989) of the first club, I carried out extended in-depth interviews with some participants and also observed meetings and some site meetings; I was also able to examine the records of the club and its published results. In

the second club, my involvement was confined to interviews and a few site visits; I was not able to interview some potential key informants, nor did I have access to the files.

Two aspects of the methods used influenced the way that the research developed. One was the inclusion in the standard proforma of questions on networking, referred to above. The second matter also arose from comments of interviewees. Whilst many of the interviews provided a check and counterbalance to accounts in published reports, some of the interviews regarding the second club revealed very considerable inconsistencies and allegations of misleading claims. One of the early respondents gave a cynical account of how consultants could gain money from the clubs 'up front' before any work was done, and were then driven to create further clubs for similar handouts. In one interview the chirpy replies - to someone who worked as a regulator and who therefore has a marked tendency to suspicion - did not convince. The case study form is notorious for the potential problems of assessing evidence - often from the perspectives of very few informants, all of whom will have their own circumstances - fairly and appropriately and without distorting the findings. It is important however, whilst not giving undue weight to views expressed, to act appropriately where there are discrepancies and these factors set in train the aspects of the research dealing with bricolage in its various types.

The clubs were examples of quasi-experimental social interventions. Because the participant firms were volunteers and not randomly selected, and no control groups were organized, it is difficult to assess in such cases whether individual projects made a difference in the specific instance described. Campbell and Stanley (1966) explored how such interventions might be designed to minimise factors which would jeopardise both internal and external validity. For example, they highlight the importance of statistical regression in considering apparent results, and also the possibility that results may be influenced both by history (in terms of specific events happening after the first measurements are taken and before the final measurements), and maturation (in terms of changes to the respondents happening after the first measurement and before the last)<sup>5</sup>. While much of their discussion is irrelevant to the situation with the clubs (where in many instances no reliable data were recorded), one aspect is very interesting. They discuss (page 31) methods of testing for effects extending in time (citing research by Hovland in 1949 which had found that long-range effects were greater than immediate effects in terms of general attitudes, although less strong for specific attitudes). They accordingly recommend, despite the "immensely greater problems of execution," that PhD students should deploy long post-test periods in research planning. Whilst I was not able to set up a study from the beginning, it was possible to consider the longer term effects of one of the clubs by asking questions to participant firms four years after its closure.

#### **Issues presented by participant observation and 'Insider research'**

Participant observation was used with the first case study club and for a small part of the evidence presented in the regulatory chapter; it has been defined as

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<sup>5</sup> Not all clubs had baseline measurements taken.

“a field strategy that simultaneously combines document analysis, interviewing of respondents and informants, direct participation and observation, and introspection.” (Denzin 1989:17-18). As with case studies in general, this approach is regarded as very fruitful for exploring the nature of a particular social phenomenon, not for testing hypotheses about that phenomenon (Atkinson and Hammersley 1994) yet, whilst providing a rich source of data the data may be of matters which not typical and therefore not generalisable to wider situations. There are ethical and practical issues in such a method. For example, whilst I stated when I joined the steering group that I was carrying out research relating to the clubs and was quite open about this, it became apparent in the second year that some intermediaries had not appreciated this as being of any significance. I had not recorded anything of which I was conscious that they would disapprove, or which showed the group in a poor light, but this made me feel uncomfortable. As Gans has commented, writing of the problems inherent in participant observation in 1968 (and therefore assuming a male observer):

“A final source of anxiety is the deception inherent in participant observation. Once the fieldworker has gained entry, people tend to forget he is there and let down their guard, but he does not; however much he seems to participate, he is really there to observe and even to watch what happens when people let down their guard: He is involved in personal situations in which he is, emotionally speaking, always taking and never giving, for he is there to learn and, thus, to take from the people he studies, whereas they are always giving information and are rarely being given anything.”

Interestingly, my role departed from that described in a number of texts, which do not consider the option that a person already in a social grouping should opt to do research (rather than the other way around) and could be described more appropriately as auto-ethnography (Hayano, 1979; Jaffe, 1997:145-168; Reed-Danahay 1997:4-9), for I not only sat on the steering group of one club but mixed professionally and socially with many of those running clubs in London and East Anglia. My slightly marginalised role meant that I was careful in participation in decisions; partly I was constrained in any case to carrying out what would be appropriate from the point of view of my employer; ethical and methodological issues occurred rarely. Whilst I attempted to retain a role of critical, though unobtrusive, external viewer, some matters conflicted with my personal values. For example, in one meeting the experienced external consultant advising on resource efficiency was challenged on his failure to recommend methods to facilitate recycling of its packaging (and not mere improved efficiency of its production line) to a major soft-drinks producer using plastic bottles. I followed a leading member of an environmental activist group in pressing hard for this. The challenge did not succeed; the example, which is discussed more fully below, is most interesting, not for my intervention but because the consultant’s approach was not more strongly challenged by the intermediaries there, and so contributed to my understanding of the norms of those on the steering group.

Auto-ethnography brings into sharp focus both the importance of attempting to be open-minded, and the necessity to acknowledge the limitations of location and the situatedness of any knowledge (Haraway 1988). I explain here therefore, that my personal position working in the first years of

the Environment Agency as a specialist on waste minimisation, and as a person with a science background, personally committed to introducing improved resource efficiency, significantly shaped the first years of this research, helping to form my early expectations that the matter would turn on quantitative measures. When, after specifically studying environmental economics and management accounting for the purpose, my early investigations revealed neither the rigorously recorded data which I had expected to find nor the possibility of forming classifications of clear methods leading to savings, I at first put it down to my own ineptitude; when I read Wolfgang Sachs I was horrified, and put the book away. Later I began to take on board the assertions of some of my early interviewees that all was not as it was presented, and to consider the likelihood that even in this small world, culture, power and institutions dominated what was happening, or rather not happening. Fortunately I had 'found', and been fascinated by, institutional accounting thanks to Peter Miller in the Accounts Department of LSE, and this later linked to some good advice by Yvonne Rydin to pursue other aspects of institutionalist writing. The matter was more complicated than this account, however, for intermixed with this finding-out was the way in which the research was regarded by my employers, for in the early years the only social science acknowledged within the Environment Agency was the risk discourse and it was difficult both to get permission to do this degree and then to negotiate time to pursue it. Conversely, of course, it was very easy to negotiate access to sources of data and to hear conversations of how the issue was regarded.

My employment had further effects on the course of the research. The fact that I was known to a number of people working in the field, who trusted me, led to my being given confidential information suggesting that bricolage was being employed by certain parties in the operation and management of clubs; the ethical and practical implications of this are discussed below. Given these social circumstances for the research, it has been vital to take great care to ensure as neutral an approach as possible (Hedrick, Bickman, Rog 1993:19). This involves, as set out in this section of the chapter, making clear, where I have a personal connection with any aspect of the issue, how it may have influenced my views and setting out in each such case what steps have been taken to overcome bias and preconceptions. More generally it implies being open to fresh details, even if apparently irrelevant, which may lead to new ways of conceiving the issues (Webb and Webb, 1932:50), and setting out material and arguments in such a way and with sufficient clarity that the reader can make up their own mind on the evidence presented.

My position also influenced the choice of the two case studies and to the decision to examine intermediaries in London and East Anglia (for my 'day job' included parts of both regions). Work in the Envirowise region of the East Midlands was also included as it abutted the East Anglian region and included the prime movers for waste minimisation clubs in the Midlands - University College, Northampton. Deployment of evidence from Northampton here, however, is kept as fairly marginal and signalled where appropriate, for it was very much an outlier - far more successful and active than the rest of the UK.

### Interview methods

For all interviews, schedules of questions were prepared; prompting, or extempore follow-up questions often followed initial answers and in some interviews, led by the interviewee, the topics covered varied considerably from the anticipated schedule. In some cases interviewees spontaneously responded to the first questions with their own personal narratives which made many of the later questions redundant. The aim in each case was to derive a greater and more comprehensive understanding of how those involved had considered and understood what occurred. Overwhelmingly the interviews were tape-recorded and took place face-to-face; some took place over the telephone and this is noted in Appendix 4. In the few cases where the interview was not recorded, this is noted. As standard, interviewees were made aware that they would have the opportunity to see any quotations from their interview before the final draft and would have the opportunity to refute them or the meaning imputed to them. In some cases interviewees gave sensitive information and here everything possible has been done to anonymise their contributions whilst weighing their claims carefully against the rest of the evidence. This was typically in the form of narratives of situations in which they had participated, so that the data were presented as a structured whole which was inevitably constructed around their own viewpoint. In all interviews my typical response was to show slight encouragement for whatever statements were being made; this will have helped to draw out people who are shy or whose memories may have been influenced by the situation but may conversely have given a false impression of greater approval for what was being retold than was the case. In a few cases, and this probably related to my experience of interviewing as a regulator, and my professional tendency to suspicion, I did not believe sections of what was being presented or felt that matters were being concealed or deliberately presented in a particular light for some reason. Unfortunately, not being in a regulatory role, I was not able to challenge this effectively but did not accord the evidence from these sources much weight. In one case it was particularly marked that a short, unrecorded interview which took place immediately afterwards with one of the previous interviewee's employees, directly contradicted an important assertion and provided a much more satisfactory retelling of the historical context. The aim of the initiatives was ultimately to change routines but the interview format did not allow for evidence to be gained on this and the longevity of changes or the lack of them largely rested on assertions. The only check used for substantial and normative change was the short questionnaire presented to the participants in the first case study club four years after closure; the replies here (some firms no longer existed) would, of course have to be classified as assertions, but in practice were less to do with assessment than with memory and recall in the face of what Campbell and Stanley (1966) would refer to as significant history and maturation effects.

### Methods of data reduction and analysis

In qualitative research, and using participant observation in particular, analysis forms an integral part of the whole process of inquiry, so that it is expected to emerge concurrently as observations proceed and awareness grows of patterns and relationships amongst matters recorded (Jorgensen:107-8). Cresswell (1994:154) quotes Marshall and Rossman (1989:114) and Tesch (1990) as to the process whereby a voluminous amount of information is reduced to patterns,

categories or themes and then reinterpreted, in what Tesch calls 'de-contextualisation' followed by 're-contextualisation', so as to facilitate "the emergence of a larger, consolidated picture (Tesch 1990:97). Whether this has in fact emerged here must be judged by the reader. For this research, developing categories began to be apparent as the secondary evidence was studied, and were reformed several times during the writing-up (and re-listening) to the accumulated interview recordings. In several cases the initial categories failed to resonate in the evidence and it had to be re-explored; repeated listening to fairly long sections of interviews was used as a method which enabled the tone and underlying assumptions of interviewees to be clarified, as this was an attempt to understand their life-worlds and not merely their observations. In the case studies where identical protocols were used for asking questions, the answers were set out beneath one another on computer, coded into different colours, so that elements of interest could be sifted, sorted and re-sorted. The evidence collected direct from the intermediaries was organized in two ways - in regard to the type of intermediary and in regard to specific aspects, and these categories, too, were subject to revision and deletion. Inevitably, too much material was collected and to reduce wordage, a whole section of evidence was omitted (which did not conflict with that retained). The evidence from the various intermediaries was also reduced considerably by discarding sections of material which would have been repetitive.

#### **Ethical issues in relation to the research**

All interviewees were told that if any part of their interview was quoted in the final draft of the thesis, they would be sent a copy of the relevant sections and given the opportunity to check that they had in fact made those statements; if they disagreed the statement would be modified or withdrawn; they were not offered the opportunity to change the argument. A difficulty arose when it proved impossible to contact some informants, resulting in some sensitive allegations being omitted altogether. Where it was judged that no-one's interests could be harmed and that the statements provided the best succinct summary of the same point expressed by several informants, a few such statements were anonymised and a footnote appended about their provenance.

There was a related issue here, which concerns the attempts of the qualitative researcher (normatively) to appear to present the views of a variety of interviewees: some interviewees were far more socially aware than others, reflected back far more and were able to express their understandings aptly. In some interviews the people might not say very much that was succinct or striking - in others the epithets flew thick and fast and the account given was riveting. In choosing short quotations to display the flavour of what was experienced (in this primarily ethnographical approach) it was very difficult not to deploy more from the first group - yet the task was to express the pertinent assertions of all those interviewed, or at least strong currents of opinion within them. It was easy to assume that the 'star performers' interpretations encompassed a more widely held view, whereas it was just as likely that the duller<sup>6</sup> accounts reflected people who did not in fact hold such worked-out views (or might have almost no views on the matter, or, indeed, might have

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<sup>6</sup>Dullness can, of course, (in qualitative research) connote that one has interviewed sufficient of a sample and signifies re-hearing a widely held view.

chosen to conceal their views when asked what they might have perceived as inapposite questions). The practical solution to this dilemma was slow and laborious checking and re-listening - laborious because some assertions and comments about a particular matter might appear at very different locations in the different recordings. It is acknowledged that the quotations chosen do err on the side of being the most interesting [not least because of the attempt here to write a readable narrative as urged by Tilly (8.9.05)] but in most cases careful checks have been made to try to ensure this was not very unrepresentative of the collections of views of those in a similar position<sup>7</sup>.

Various ethical issues regarding the research<sup>8</sup> arose from counter claims made by some interviewees and other informants who regarded (at least some of) the clubs as a scam and challenged the validity of some results quoted from them. First was the issue of how to treat some of these claims, which had not been gathered methodically. Second, whilst they were plausible claims, they could not be verified, nor was there any way of gauging the proportion of the initiatives which might have been subject to such approaches. This was a particular problem because, as the earlier section in Chapter 2 on the previous evaluations has shown, many of the overall conclusions about the initiatives were drawn from the relatively small sample of clubs for which there were detailed reports, nor were the total number known. Thus verification for the positive view taken of the initiatives was also impossible (and hence the focus here on claims and claims-making rather than on the truthfulness of the claims). The 'counter claims' came within the definition of sensitive research, where there were "potential consequences or implications, either directly for the participants in the research or for the class of individuals represented by the research." (Lee, 1993:3, quoting Sieber and Stanley, 1988:49)

There were particularly severe implications for two informants, who were working in the field and could have suffered if their actions in exposing what they believed to be scandals had been made public. But alongside this were potential implications for those who had participated in carefully assessed initiatives in good faith, whose work might be discounted if unsubstantiated claims, whether about the clubs they had been involved with or not, were used as the basis to discount their findings. In response to these issues, the material gained, which is not replicable as it was given in confidence, has been placed in a separate section which sets out the context and classifies the proffered information (following the constructs used by McAdam, Tarrow and Tilly) as evidence of covert contention, taking the form of counterclaims or counter-narratives. Also, the thesis has been written so that the informants and the subjects of their allegations remain as far as possible anonymous and care has been taken in the presentation of the two sets of approaches regarding the value of the initiatives to make qualified assessments of all allegations and claims so that a few reports of what might be a very small proportion of the initiatives do not necessarily tarnish - or gild - the work carried out elsewhere.

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<sup>7</sup> (this argument does not apply to people in unique positions for the purposes of this analysis, or where, as in the case of the section on academics, individual experiences and tactics were specifically chosen to personify trends.

<sup>8</sup> separate from those arising in relation to participant observation as a method, discussed above.

A third issue in relation to these counterclaims concerned whether I had an ethical responsibility to warn others of the allegations. When funding was withdrawn from one club I was given a copy of the confidential report that was written on the matter prior to this decision being made. Shortly afterwards I found out that the club was to be subject of an adulatory report from a different source and was sent a copy of the draft. I contacted the editor to warn of the potential embarrassment which might accrue to the publishing organization. In fact, the warning was ignored; given that, some of the details from the document are used here (to exemplify another matter). Similarly, I also mentioned to a colleague whose team were proposing to work with certain consultants, and to a contact who was proposing to provide funding for a particular club, of the allegations I had heard - neither took any notice.

### Conclusions to the chapter

Each research design has limitations and this is particularly the case here, where the research was shaped both by the lack of quantitative information, and by the 'insider' nature of the enquiry. Every effort, therefore, has been made to minimise bias, both by having a design which draws in many different sources of data, and by the approaches taken to analyse and weigh the data obtained. The research focuses on claims-making activity, not on the truth or otherwise of the claims, and on the role of those who made the claims and the effects of those claims in their varied institutional settings.

The empirical section of the thesis follows, beginning with a chapter on the case studies. The subsequent two chapters focus directly on the intermediaries, examining four different types and their institutional contexts: the national organization awarded the main contract to promote waste minimisation; the Business Link staff working on environmental advice at local level; staff from three universities which undertook work with the clubs; and the regulatory body which also ran clubs.

## **Chapter 5. Results from case studies of two clubs**

This chapter explores the roles, settings and manner of working of the intermediaries by setting out evidence from case studies of two waste minimisation clubs which were each run in deprived areas of London but with different modes of organisation and funding arrangements. To assist understanding of the outcomes of the intermediaries' work, the final part of the chapter considers the longer term effects of such clubs, with an examination of evidence from interviews with participants in the first case study club made four years after it closed. It was not possible to follow up the second club because no definitive list of members was available.

### **Evidence regarding the first case study**

The first case study club, the North East London Waste Minimisation and Management Project (NELWMMP) ran from 1 April 1997 until 1 April 2000; the researcher was a participant observer, acting as a member of the steering group from July 1998 onwards. In many ways the evidence gained from the club showed it to be fairly typical of a partnership-led, grant-based waste minimisation club, as presented by the secondary literature on the subject. It was run by a university consultancy backed by a partnership steering group, with 15 participating companies. The approach used - individual advice and audits from a major, specialist consultancy, mixed with training and discussion - was typical of how a number of clubs were reported as working, for example, the 'Sabina' based on the Severn Estuary and 'Medway and Swale'. The logic of ecological modernisation was very apparent and all involved expected the project to produce good results in terms of cost savings for the participating firms, which was the case. The discussion here focuses not so much on the achievements of the club as on governance and institutional factors.

The club, whilst ostensibly formal in its arrangements, presented and championed a simplistic view of how change might be expected in firms. Its workings were dominated by financial logics and mechanisms to incorporate specialist training. Much of the evidence from the club, with its messages of "win win" and of financial savings for firms, is easy to present and explain in terms of the ideas and concepts used in public choice approaches. Yet it had other aspects, such as the shaping of the organisational framework to fit the pre-existing accepted mould of what a waste minimisation club should be, and to provide evidence to fit the needs and expectations of the grant giving body, reflecting institutional aspects of what occurred.

The club was an SRB-funded project spanning three inner London Boroughs, Hackney, Tower Hamlets and Newham. As part of its policy to promote equality of opportunity and reduce social exclusion (for example, of ethnic minority communities), the UK government had launched the

Single Regeneration Budget in 1994. Particularly after its revamping in 1998, the programme targeted the most deprived local authority districts in England (Smith 1999), supporting such matters as comprehensive regeneration schemes, measures to improve job prospects for local people, and, (often as a minor part of a main bid), measures relating to environmental sustainability. As part of its ethos of supporting local initiatives, alliances and co-operation, SRB funding favoured mixed schemes which linked to other local programmes<sup>1</sup>. It was administered regionally - in this case by the Government Office for London. Typically, bids, including a whole mix of projects, were for several million pounds to be spent over a period of up to seven years. These funds went, not to single recipients, but to partnerships of local organizations (the rationale being that encouragement of inclusive and effective local partnerships would assist local people's ability to develop their own regeneration initiatives) yet via an 'Accountable Body', a reputable (and usually prominent) intermediary organization such as a local authority, which formally entered into the funding agreement with the Government<sup>2</sup>. The system was therefore particularly interesting for a thesis focusing on intermediaries, as the intermediaries acting within a club operating with such funding would themselves typify the 'partnership running via intermediaries' model of a nationwide funding system.

The three Boroughs in which the project was located were described in the Bid Document for grant as having many 'pockets of urban deprivation' and an unemployment rate of 19 per cent. Whilst there was significant employment by the public sector, the 20,000 or so businesses in the combined area were predominantly in the service industries - 82 per cent of them employing less than 25 employees, with significant skill gaps in the workforce and a high rate of small business failure. There was a large proportion of ethnic minorities, who traditionally filled many unskilled and semi-skilled jobs and who were also disproportionately affected when there were layoffs. (all, Bid document) The area was later depicted as (NELWMMP Delivery Plan document for 98-99 dated 4.21.98, at page 1)<sup>3</sup>

'the poorest in Europe with above average unemployment and large areas of industrial dereliction. The local economies of these areas have been in steep decline over the past 20-30 years, with high levels of poverty and poor quality of life for the vast majority of the population'

At the time it was unusual for several local authorities to collaborate in order to run a greening of business initiative. (interview with local authority representative 8.6.04). It was notoriously difficult for local authorities to work together, not least because of their distinct, slow and formal approval mechanisms. Another distinctive feature of the club was that whilst most waste minimisation clubs focused on manufacturing firms, the participants included an unusual range of service-based organisations: two local authority leisure centres, a local college, a community centre,

<sup>1</sup> London Development Partnership and Government Office for London 1999, Single Regeneration Budget Round 6 Bidding Guidance, London, Government Office for London

<sup>2</sup> Environment Agency Business Efficiency Team 1999, 'Overview of Funding Sources' June, Bristol, Environment Agency

<sup>3</sup> All documents cited relating to the case study clubs are held by the author

a centre dedicated to finding work for local unemployed people, an innovative property management company running Spitalfields market, an ethnic minority-led small business association, a timber importer, a builder and an award-winning ethnic restaurant as well as the local branch of McDonalds. The manufacturing firms were also very varied and included a local unit of Britvic Soft Drinks (which mixed and packed Pepsi and Tango in plastic bottles) besides manufacturers of packaging, furniture and chemicals.

The composition of the steering group, or Project Board, was typical of several club projects nationally as was the choice of consultant. Whilst the university provided the vice chair, the chair was taken by a senior person hailing from a major oil company. There were representatives from the three local authorities involved, from the university and from the Environment Agency; the SRB bid document confirming (page 19) that,

“The Agency regards waste minimisation as an important part of its functions.”

Business advisory organizations in the area also helped to form the core of the partnership: the local Business Link office and two local Training and Enterprise Councils. ETBPP was formally represented, but rarely attended. Local environmental activism was represented by The Environment Trust, a long-standing and successful local community environment organization and by Ann Link of the Women’s Environmental Network (who was the driving-force behind the Waste Minimisation Act); the Network was based nearby and had instigated the waste minimisation work that went on at Spitalfields Market. Over the three years of the project, whilst several of the representatives of the organizations changed, good working relationships were built up and some later worked together on subsequent initiatives. The project consultants, March Consulting Group, were involved very early and some members of the Board reported that they had actually assisted in the Project Bid. March had already run several waste minimisation clubs since 1992 and by 1997 was certainly the market-leader in the field. It had worked on the Aire and Calder project, Catalyst, Humber, Merseyside, and was working on the Don, Rother Dearne, and this, of itself, helped to ensure that NELWMP was run in the same mould as previous clubs. March received a retainer monthly, and also received expenses on production of time sheets.

Reporting to the Board was a full-time Project Manager based at the London Environment Centre, a consultancy formed when the Environment Department of London Guildhall University had closed down. The involvement of such university-based consultancies in setting up and running initiatives, especially training, was not unusual, and the University of Hertfordshire, the University of Lincoln and the University of Northumbria at Newcastle, for example, had also been involved in running clubs.

#### (i) Funding and and its influence on the project and its governance

In institutional theory regulation is regarded as taking many forms, not merely formal regulation set out in statute. The normative shapings and systems of control operating on organizations and individuals can be self-imposed or imposed by an external entity which is for some reason particularly influential for a given organization or endeavour (Morgan and Engwall 1999:1-6).

Regulatory issues impinging on the clubs during the period of this study occurred at several levels - the government departments' contract influenced ETBPP/Envirowise; their understandings of what the projects were and should be, shaped club activities, formal regulations limited actions too, as did the fact that they were run as distinct projects, with grant funding, by intermediaries of various kinds, each with their own professional stance, but with many common constraints, drivers and opportunities. For NELWMMP, it is argued here, the need to comply with the requirements of the source of funding was the dominant system of control, so the two matters, financial arrangements and governance are considered together in this section.

#### (a) The mode of obtaining funding

The SRB Bid document, which was drawn up to secure funding for the club, set out the main aim of the project, which was to recruit 15 companies in North and East London to work over 3 years to establish 'environmental, cost-effective and skills improvements', using a 'proven successful project concept, the club waste minimisation scheme', as well as training and 'continuing professional development' 'to prove to local businesses that environmental management has tangible economic, environmental and employment benefits.' Thus the club format, at that time, was seen as self-evidently successful and a suitable way to justify a further club project. During the time of observation for this research, all those on the Project Board were confident of success in this respect, that all the companies, if they participated and were committed, would save significant amounts of money. It was claimed in the Bid document that, collectively, the participating companies would, after a capital spend of £150,000 over the 3-year period of the project, have savings from waste minimisation worth at least £300,000 per annum, reducing their operational costs and enhancing their efficiency and environmental performance. The skills of the project partners were described as 'crucial' (pages 1 and 9) in assisting with recruitment, and in the dissemination and replication phase. The total project costs were stated as £805,000, with £420,000 of this coming from the SRB Challenge Fund, £50,000 from other public sector contributors and the rest from cash or "in kind" contributions from the private sector including participants who contributed of the order of £5,000 each.<sup>4</sup>

It is clear that the Bid Document was sculpted to fit the expectations of the grant-conferring body, and to be isomorphous with its view of what constituted a worthwhile project on which funds could be legitimately allocated. It carefully set out all the government policies and programmes with which the project fitted, such as the policy document *Making Waste Work* and the aims of local Agenda 21 initiatives. The project was also given, by the bid author, Monica Hale, then of the LEC, many laudable but exorbitant conjoint aims. It was to create:

'a waste conscious business and industry base, one which is committed to sustainable resource use' (SRB Bid document, 23.9.96, p.1) with improved compliance in Health, Safety and Environmental Regulation' (Bid document, p.4).

<sup>4</sup> SRB Bid document , 23.9.96; the Challenge Fund monies were designed to be paid on receipt of evidence of satisfactory progress - £128,500 in the first year; £175,000 in the second and £116,500 in the final year.

The project would, it was said

‘consolidate the existing employment base’ so that

‘Growth can be expected from within participant businesses and by new businesses, attracted by the availability of appropriately trained staff’ (p.2).

The lily was gilded further by suggestions that

‘the increased employment opportunities and enhanced environmental concern may indirectly reduce crime and increase community safety.’

The reduced resource usage and better management of the remaining waste from the project, would

‘improve local environmental quality... Local infrastructure and aesthetic enhancements are dependent upon inward investment and the growth of existing business and industry, both of which will be enhanced by the proposed project.’ (p. 2).

Each of the above statements could possibly be defended, yet their linking in this way, ignoring the scale of the improvements which might be offered by a project assisting 15 companies, and their likely tiny influence in relation to the problems of these poorer areas of London, amounts to a preposterous untruth. At least the bid honestly stated that there would be

‘no (at least direct) cultural or sports benefits, other than those that will accrue indirectly from increased wealth generation’ (SRB Bid document, p.3)

The overstretching of its aims in order to get grant monies was to have some untoward consequences for the Project.

The Bid also tried to align the project with other ongoing environmental initiatives, and this underlines the context in which the clubs ran, for there were a multitude of small initiatives targeting businesses at this time. There were claims in the Bid document that the project would link to the championing of the European Eco-Management and Audit Scheme by the Department of the Environment. It would link to the ‘*Making a Corporate Commitment Campaign*’ which called on directors of firms to commit to responsible energy management; to the “*Teaching Company Scheme*” (to give graduates experience by subsidising their salaries for a time and with which Guildhall University was already involved), to the National Education and Training Targets and an initiative to encourage employers to help young people to achieve Foundation and Lifetime Learning Targets. Specific claims were made that at least 3 of the 15 firms would achieve certification to a recognised environmental management system, such as BS7750, EMAS or ISO 14001 and that there would be created 2 full-time permanent jobs directly and several more indirectly “associated with the capital spend necessary to achieve the savings” (i.e. implying that local suppliers would be used for capital equipment) and that further jobs would be safeguarded because of the savings made by the 15 companies. Special efforts were to be made to “target and engage businesses run by and/or employing a significant proportion of ethnic minority staff” (SRB Bid document, 23.9.96, p.2). Thus the project was conceived, with every appealing institutional attribute which its originator, the London Environment Centre of Guildhall University, could provide. The Government Office for London, (GOL), later conferred the wished-for grant. The monies were designed to be provided in three tranches, on confirmation that targets had been met and satisfactory progress was being made, and from the first this mode of financing, despite its

generosity, had a profound influence on the way that the club operated and financial matters dominated its internal proceedings.

The 'accountable body' for the project, London Guildhall University, a new university part-based in the old Sir John Cass College, received the SRB Challenge Fund Grant and was charged with the responsibility for realising the Delivery Plan. Responsibility for monitoring progress against an agreed time-scale and key indicators, as well as responsibility for prioritisation and running the project rested with the Partnership Board. (Delivery Plan for 98-99 dated 4.21.98 at pages 6 and 8) The Board received reports at their quarterly meetings to judge "the progress of the project by means of the key indicators and project outputs, offset against expenditure, to ensure value for money verification" and to scrutinise performance "as a basis for payments claimed [from GOL], or require their modification or further justification."

#### **(b) financial management systems and evidence of symbolic regulation**

Financial management was via the existing systems in place in London Guildhall University - all transactions going through their Finance Department where the Project Director and Finance Officer were based. Under these systems, which it was explained had been important in succeeding in the grant bid, every payment on a specific budget was required to go through a budget-holder who was responsible for that budget, and there were additional system checks besides, with an annual audit by independent auditors. For the projects, records were required for all expenditure claimed, thus the consultants, March, were required to provide records of both invoices to participant companies, and to produce time sheets of time spent by participant companies, in order to monitor both the financial and the in-kind investments secured. (all this from the Delivery Plan 1998-9, 4.21.98 at p.8). The Finance Officer was represented on the Partnership Board. These controls were set up to ensure that there was no financial impropriety, good records were kept and good relations were enjoyed with GOL.

Despite this exhaustive setting out of roles, responsibilities and procedures, financial control was in many senses a matter of institutional appearances and goodwill. This was not because anything improper was done, to my knowledge, but because a kind of group stultification and unwillingness to press for more precision and concision took over. For example, carefully produced updates were prepared for each Project Board meeting as Quarterly Reports; these commonly ran to 25 pages or more, and as they were based on a *pro forma* produced on computer, much of the information was always identical, with updated figures and achievements changed at appropriate points, each of the new developments being explained at meetings, taking up considerable time. All the Quarterly Reports for a year were combined in a Monitoring Returns Report for the Government Office for London. However, GOL required Quarterly Reports to be completed *before* the end of the relevant quarter, so 'best estimates' might be submitted and used in the Monitoring Returns Report (Minutes of Partnership Board meeting of 21.5.98). Despite the careful procedures and production of thick documents, the Board had only arms length information about what occurred; no real details of money spent were given to the Board in the first year and it was only on 21.5.98 that members

asked that a summary of monies spent to date be provided at all meetings (minutes of that meeting).

Similarly, much of the 'expenditure' of the project was 'in kind' - it was in the form of the time of participants. There was a widespread practice at the time, which was accepted without challenge, for the figures cited for the value of the time of a particular project board member to be treated generously, thus increasing 'in kind' expenditure, for it was a stipulation of many grants that this funding should total a certain proportion of the grant money donated. Accepting estimates which exaggerated salaries was seen as one way of responsibly assisting in the process of obtaining funding for worthwhile initiatives. Again, there was a problematic element to the amounts which the participant organizations claimed to have saved. There were careful systems to monitor and assess the financial savings made, (point made by Project Manager at the final Board meeting in May 2000) and the Project Champions from the participant firms met on a quarterly basis to consider developments. The value of good housekeeping changes can be very difficult to establish and in many cases the estimates of sums saved came from a (difficult) process of continuing negotiation and liaison with the firms concerned, to ascertain and agree their estimates, rather than replicable measures. The participation of the organizations was entirely voluntary and the survival of the project depended upon them persevering with an often tough series of changes; if their statements about savings were challenged too rigorously or demands were made for more precision than they were prepared to provide [for all measurement has a cost, (Barzel:1982)], they might withdraw from the project. This was a situation where, as it were, implicit trust in their probity was demanded by those who had instigated changes and yet the integrity - and perceived level of success - of the project rested on a supposition that the claims represented verifiable quantities. The amounts of the savings were scrutinised carefully by the Project Manager; there is no record of any calls by the Board to scrutinise claims directly. As a participant observer, it seemed clear to me that the role of the project staff and consultancy was perceived to be to obtain reportable figures of savings - challenges would have been destructive of this central task.

Reactions to the publication of an article about the club in *Environment Business* in April 2000 indicate some of the attitudes to the claims-making. The article appeared shortly after the end of the project period, but before the last board meeting, and was reported on at that meeting. The reporter had misrepresented the savings, suggesting they would eventually save the firms £3 million, rather than £300,000. No correction had been sent to the magazine, nor was there any suggestion made at the meeting that this was unreasonable. In the article the Chief Engineer at Britvic, (which was reported as having made the largest savings of any of the firms - £160,000) was reported as saying that that figure should be viewed with caution as Britvic had new equipment installed during the project which was more energy efficient and less wasteful but which had been ordered before the company joined the programme, and as it might be the cause of some of the savings he was waiting for a full breakdown of the claims before he could be certain of the position. There were similarities in the circumstances of claims made about job-creation - it was difficult to verify them. A full-time yardsman was taken on by the building firm as a result of the project; another of the firms, McDonalds, had expanded and taken on more staff but it could not be claimed with certainty that

the project was the root cause of this change<sup>5</sup> and there was discussion about whether it should be counted.

“It’s just worth pointing out that in the last year of the project we were asked (by GOL) to create 2 jobs and safeguard 15. The best evidence yet is that we have actually created 7 jobs and safeguarded 12. A lot of those jobs have actually come from McDonalds and it’s difficult to work out what full-time equivalents those jobs are, so it might be 6 or it might be 7; we’ve got to get some more information. One of those jobs is mine and the last one .. comes from Finlays; because of the need to keep their yard tidy, they have appointed a full-time stockman.”

(Project Manager recorded at the last meeting of the Project Board in May 2000.)

Whilst the records kept of the project with regard to the paper evidence of money transactions were very carefully reviewed, some of the scrutiny of the nature of the claims was in fact rather lenient. The Year One Review, for example, (Project Delivery Plan 1998-9, 04.21.98 at page 11) alongside significant milestones such as recruitment of the 15 SME’s to the project, recruitment of volunteers, and holding of training sessions, were listed the ‘achievements’ of “establishment of the Partnership Board and scheduling of regular meeting of the Board”; “Year 2 Delivery Plan drafted” and “project monitoring system established”. In part, these were probably allowed to go through because the style of the project documents was verbose and rather pompous, but a more searching overview of what was happening would have demanded that these irrelevancies and non-achievements were pruned out. Whilst they remained in, the extent of the true benefits of the project was disguised. Linked to this, and perhaps to mask the poor attendance at training events, (reported, e.g. in the 6th Quarter report) the project reports provided extensive tables of the duration of seminars and the number of ‘training hours’ provided for the participating companies. These matters are instances of seeing qualifiers to the facts as expendable in the effort of making the right impression. They are small matters of smoothings-over and imprecise claims-making. Evidence from other sources suggests that these were relatively common practice at the time (see, for example, the discussion in Fineman, 2001); it seems churlish to make an issue of them, but cumulatively they shift expectations, so that success in and from the clubs for the participants appears both inevitable and commonplace, and this expected concomitance may have further added to the tendency for some intermediaries to be less demanding of precision for what they reported.

Major concerns at meetings of the Board were that there might be underspends in using the grant monies. This was important, for it is one of the prime responsibilities of grant recipients to be seen to use the monies, (for not doing so creates serious inconvenience to grant givers at year end) and further grants might not be forthcoming for subsequent projects, if the money was not all spent as promised. Discussions of what to do about underspends or looming underspends, and whether the funds could be transferred to, say, the dissemination activity budget, or further companies added to the project, or companies which had already received capital grants be allowed to receive more, etc.,

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<sup>5</sup> “the feasibility of counting McDonalds franchise expansion and subsequent jobs creation is still being examined” (LEC London Guildhall University and March consulting Group, NELWMMP Quarterly Report No. 12, January - March 2000, p.12)

took up considerable time for the Board. (e.g. July 1998 meeting and at the meeting of 18.01.00)

**(c) means of increasing recruitment: the administration of capital grants**

As an inducement to firms to become involved, small capital awards had been offered to participant organizations. These in essence ensured that the cost of belonging to the club for the smaller participating firms should be neutral. A maximum of £5,000 (the typical cost for firms to join the project) could be spent on capital projects which assisted the firm with improved efficiency in the use of resources; the firms, however, were required to provide 50 per cent of the costs and this was a considerable stumbling block for small organisations, always short of capital. Further, there was a mesh of rules about the capital awards and the necessary evidence to show that the monies had been used for this purpose [their complexity made them unclear even to the Board - (Board discussions in February and May 98)] which included the proviso that the Government Office for London would have 'call on 50 per cent of the depreciated value of the equipment funded' in the event of bankruptcy or other company problems.' It became difficult to spend this money.

Discussion of progress on this and possible ways out took up considerable time in the steering group. (e.g. at the February and July 98 meetings) Some of the applications revealed that the participating companies did not share the understanding of the essentially environmentally beneficial nature of waste minimisation voiced in the Project Board. For example, McDonalds asked to spend their capital grant on 'remotely operated locks on toilet doors'. The Board, mindful of the key social role of McDonalds in this respect, rejected the application. In other cases there were fears that even were the grants awarded, the recipient would be unable to find the remaining capital: Tower Hamlets College wanted equipment to improve zoning of heating, ventilation and air conditioning but the total price was some £29,000 and there were concerns that if they were unable to raise the rest of the price, there would be an adverse effect on grant forecasts if the £5,000 went unspent (meeting of 18.1.00). Thus measures which on paper appeared to nullify any financial risk from participation, were doubly ill-conceived.

Enormous amounts of effort went into spending this money in ways that would be and could be deemed appropriate by the Board and by GOL. Those firms which in fact did so, were the larger firms. Britvic Soft Drinks, for example, was one of the most efficient for processing the applications and actually exceeded the limit per organization that had been allotted; this was accepted as the Project Board found it so difficult to use up this money (minutes of 18 February 1998). It used the money for installing water hose nozzles, improving boiler controls, increasing insulation on steam pipework, and also buying and installing software (to assist in monitoring and targeting energy usage and waste) developed by the project consultants, March (which they sold to participants in a number of clubs). In contrast to this, a great deal of work was done by WEN, the Project Manager and a student from Middlesex University, Leya Kawamba, to provide a commercial dishwasher for the use of the stalls at Spitalfields market, which would have revolutionised the service from the food businesses there and enabled them to avoid disposable

cutlery, cups and plates. At an estimated cost of £300 per stall-holder, it could have provided a significant practical example of waste minimisation for the many thousands of customers visiting the market. Owing to matters including failure to obtain permission from the Planning Department in Tower Hamlets (the site was a listed building) this was never installed, and monies which might have been spent directly on this were used on far less significant projects which met the requirements stipulated by the funding body.

#### **(ii)The dominant logics and mode of operation of the Project Board**

It is argued in this section of the chapter that the aspects of the scrutiny role of the Project Board noted above were associated with its context, its composition, and the manner of the proceedings. It might be thought that a partnership mode of operation, bringing together a wide variety of points of view, would, through the clash of discussion, lead to the emergence of a new and beneficial understandings<sup>6</sup>. This was not the case here, for a number of reasons, the first related to the mode of funding.

#### **(a) context: the influence of short-term grant funding**

The club was one of numerous environmental initiatives aimed at the business community in London at that time, nearly all of them dependent on grant aid, and because of the hiatus in government policy on the best course to take with regard to waste, there were a plethora of proffered projects and schemes to fill perceived gaps and failings in what the organisers considered to be available for firms. Many such initiatives involved consultancies or environment groups, and in London the competition was heightened because several such organizations had their head offices there. There was competition between providers of initiatives, so that in some areas there might be considerable over-provision and in others none. The different schemes on offer - some of them free, and some charging fees - were often confusing to business and this was to be a feature of some of the empirical results gained direct from targeted firms.<sup>7</sup>

The funding regimes were crucial for organizations engaged in this 'greening' of industry; many of the projects were literally creatures of the particular funding regime, for few funders would assist projects in the longer term. Each project must appear new and necessary, and while there was considerable wheel reinvention, this was disguised. For example, Steve Waring, who had held a senior position in ETBPP, commented that the seemingly inexorable flow of curious and quaint names for environmental projects was that there was "Innovation in titles and presentation in order to get the funding"<sup>8</sup> The funders tended to favour projects where there was evidence of other sources of funds, whether these were financial or in kind. This incentivised organisers to get together consortia, and in this situation it was important to have good relations with potential partners so that grant bids could be prepared quickly if necessary. It was not surprising, therefore,

<sup>6</sup> See discussions in Greer (2001) and Tomlinson (2005) on the partnership approach more generally.

<sup>7</sup> See Hines (2002:178-9) who discusses an analogous situation in South Wales.

<sup>8</sup> Telephone conversation with Steve Waring 9.1.04

that there was little overt contestation or challenge of views between partners in a project.

This dependence on short term grants, and the concentration on securing money for the next grant as an old one closed, meant that there was little continuity, and often very little support for firms which had been engaged with an earlier project. The best chance for further support was for the firms previously engaged to join one of the new projects, as this gave them further assistance and made the stumbling block of recruitment one firm less difficult. Once the grant funding had been used there was commonly little left for dissemination of results or evaluation, nor would evaluation be wise if results had been less than expected, for this would have been to advertise that previous grant monies were not well spent. At the Partnership Board meeting of 10.10.98, there was a general discussion about clubs and the grants for them; the March representative, surprisingly, began to speak of a certain malaise and distaste for projects he had found elsewhere. He remarked that in his experience firms in the North West were increasingly 'turned off' by projects with consultancies which were trying, not to sell a service, but to spend a particular grant; this resulted in lack of subscription to schemes where firms in fact stood to gain considerably. He also cited the experience of the Humber Resource Efficiency Programme, an earlier waste minimisation club, which could not spend its grant money and had to give some of it back; whilst the exit plan had been to continue in the same kind of work and the project had been reported as successful, it had, in fact, not really made a difference. He remarked that this was not a singular experience. Whilst there is no evidence other than his assertions that this was the case, it is evidence that staff of the major consultancies involved were already, in 1998, aware of the 'window dressing' of projects to ensure that they appeared successful. In such a regime, whilst a reported success was vital, it should not be too good. There was, in fact, little benefit from successfully establishing a state of affairs which appeared viable, for if so, the organizations involved might be expected to continue to run the matter without grant support, and few had sufficient funds for this. If the project did not go too well, plans could be made to reshape it and a new grant applied for to cover the costs of the remedy but in the guise of a new initiative. This, as was commented by one of the senior consultants interviewed, was tantamount to a tax on success.

#### (b) composition

The composition of the Project Board at NELWMP also reflected the constraints presented by the predominant funding regime. If funds were to be obtained, it was helpful to have evidence that the project was supported, symbolically, if not practically, by influential organizations. This mode of legitimization, of which there was visual proof by the appearance of a logo, was commonly termed 'badging'.

The grant regime therefore led to partnerships comprising members not specifically chosen for a particular initiative, but rather a rolling selection of choices from similar groups of organizations. Partnerships were likely to consist of representatives from organizations who might well have worked together on particular projects in the past and who might share involvement in others in their current portfolios of projects. Further, people moved posts, so that a person who had been

involved in one initiative when working for one organization might be involved in a different guise for a new organization in another. Some people on the Project Board worked with the researcher before, or subsequently, on different projects or on attempts to set up new projects. Several of the Project Board members of NELWMMP had worked in Environment Departments in local government and most were used to the consensual, orderly (and slightly slow) approach, with ready acceptance of compromise, which was typical of local government. This 'small world' meant that, whereas representatives might be considered as emissaries carrying the culture of their organization, resulting in a potentially beneficial interplay between the different cultural norms, in fact, the common characteristics and job opportunities meant that for some participants, the partnership meetings were 'as comfortable as being on one's own cushion at home.' They were also good locations for networking on a variety of matters.

Staff working on liaison might attend several partnerships in the course of a week, which might mean involvement with a number of projects concurrently. It is argued that this type of arrangement influenced the approach of Board members in two ways. If one has, say, that morning sat on a technical board regarding waste disposal planning, again with a partnership format, or on a committee to organise a conference for construction businesses, the demands of such roles merge. The clearly perceived task in such meetings would be to represent the parent organisation in a responsible manner, to bring back matters of concern to an appropriate person, (having said calming words to anyone who might be angry, for example, and to promise to find out more and get back to them) and to act as a responsible member of the partnership, by being helpful and facilitative. This apprehension of the task was not expected to include formal oversight. On the other hand, where one approached a new type of partnership which one had not sat on before, one was concerned at not knowing precisely what the need was, and what should be done, thus one went 'with the flow', fitting in to the situations as others did. These two combined factors, of not knowing precisely what was needed, and having apparently comparable experience elsewhere which could be transferred over, acted I would argue, in a classic way as regards institutional expectations, and led to concerns about the regulation of the project or of the project firms, being very low.

In fact, some of the attitudes of the NELWMMP Project Board reflected their arms length involvement. It was difficult for steering group members to gain first hand knowledge of what went on in the participating firms; they were kept at arms length by the way the projects were run. For example, even as someone who was carrying out research on clubs, I found some difficulty in gaining direct access to the firms and their project champions. This was partly because the time I was allowed away from my job was limited, but also because of the way that the projects were set up. The links with the firms were directly with the consultants and the project managers from the university - not with steering group members. At the May 2000 meeting the consultant from March commented that there had been very little involvement of the boroughs in anything other than recruitment and at the steering committee meetings. Other steering group members also had little contact with the events and changes at the firms and this led to the Board receiving little evidence,

[in the sense described by Majone, (1989:46-52)], but merely argument from the managers and consultants:

"I haven't seen too much actually... I have been into a couple of the companies, just by myself but the only thing I have really seen in terms of output is the records that they produce and what they are actually saying is going on..." (board member, November 99)

The Board were also, in the main, busy people with full-time jobs elsewhere and this lack of time to give to the project reflected badly when it came to the dissemination of the achievements to local firms. Whilst the involvement of the local authorities and other local intermediaries had been seen from the first as vital for the effective dissemination of the results - the most vital aspect of the project if other firms were to take on the resource efficiency agenda - the Board, used to relying on the university consultancy and subject to time constraints, was not able to give the matter the attention and resources necessary. At a meeting on this topic (18.1.2000), the consultant from March explained carefully how other clubs had carried out the dissemination phases of their projects, but in the event the matter was left more or less to the LEC to set up seminars and a newsletter, *The Connector*, for businesses 'who want to save money through environmental improvement'. Attendance at the seminars was poor, despite hard work by the manager, with 73 attendees from 44 businesses. The initial hope was to get 20 businesses to each event but in February 2000 this was reduced and 10 became the target for the event to be considered a 'success'. The cultural distance from some of the target audience was shown by the fact that a dissemination event for the restaurant trade, which is vibrant around Brick Lane, had to be cancelled and it was learned later that some restaurateurs, for whom English was not their first language, had seen the official letterhead and the word 'Environment' and thought that the matter was related to Environmental Health inspections. A nice point for environmentalists is that it was reported that they assumed that the word 'Environment' meant regulator (discussion at last Project Board meeting, May 2000).

#### (c) manner of proceedings

The Project Board met monthly for the first three months, then quarterly. It was given information on matters such as Performance against key indicators, achievement of project milestones, summary of quantifiable outputs, project expenditure and supporting documentation. There were formal Performance Reviews every 9 months. Each member of the Board had a vote, though there was very rarely voting. The predominant attitude within the Board was that the neither the partnership nor the method promulgated by the club was problematic - the problem was perceived as that of 'getting the message across to businesses' and getting them to respond. In this, combining with others to support a well-managed project by agents known to their organizations was seen by most as self-evidently a good idea, as a Board member remarked:

"This is one of those issues where you are still having to push businesses into, so if you can do it with other agencies, all well and good." (Peter Holmes of Focus TEC, 13.10.99)

These attitudes were not true of all participants. Ann Link of WEN rejected the dominant financial

logics:

"The expectations of the consultants and particularly the LEC were of it being extremely difficult to get companies to do anything and they would be motivated by all the commercial motives possible. Some of that is true, but we did recruit people who were enthusiastic."

The cumulative evidence that I gained from the case study with NELWMMP was that most of the Board were comfortable in the partnership; most came from similar backgrounds and expected it to operate under norms that they knew. The expectations of consensus and of a good outcome were partly due to the excellent and warm chairing of Dr. Peter Scupholme of BP, who facilitated easy relations and a careful, but not overlong review of the reports that were to be considered. It was patent that the project manager, Jez Cutler, was a very conscientious and hardworking person<sup>9</sup>, and I found no evidence that partners had any concerns over the integrity of what was occurring or what was presented to them; the presumption was that the attitudes shown around the table were 'normal' and those of people with good sense.

### (iii) Contention, green idealism and the predominant culture of the project

The common background and interests of many on the Board may have made them comfortable, but contributed to a situation where alternate voices and particular kinds of questions were seen as inappropriate. There was not an atmosphere of intelligent and demanding argument to draw out the best way forward, instead, as was to be found, those who did not agree tended to keep their reservations quiet, or to leave. I was aware, as a person whose main role was as a regulator and who was expected to distrust, that to be suspicious or challenging was slightly out of kilter with the mode of operation of the group. On one occasion, near the start of my involvement with NELWMMP, (meeting of 10.10.98) I, with Ann Link from WEN, became engaged in an argument with the representative from March about its advice to one of the companies which was producing its product in non-returnable plastic packaging. This seemed a nonsense for a waste minimisation project and as the products were sold to consumers, the costs of plastic recycling or disposal fell as a cost on the local authority where the consumer lived: this was far beyond the resources of the hard-pressed local authorities in the project. We suggested that a letter was sent to the Board of the company pointing out the situation and asking them to consider returnables. There was support for this from Hackney, but the response of March was to the effect that it was inappropriate, and such matters should be referred for use in a future project, or in the exit strategy. The reactions of the others there led me to believe that they considered such intervention inappropriate too. I believe these exchanges exemplified aspects of the attitudes within, and the character of Board meetings towards, contention and the bifurcated attitudes towards what is termed here 'green idealism'.

#### (a) the crucial part played by green idealists in different roles

The logic of cost saving, so important to the project, was, in the ways things were spoken about,

<sup>9</sup> Indeed, the project manager's reports to the Board show that he deliberately chose to underestimate claims of savings from firms where there were doubts.

both kept at a careful remove from matters of principle, and treated as consonant with them. Yet amongst the participant organizations, the Board, the management and the consultancy were people who from their own statements, were, personally, dedicated 'greens'<sup>10</sup>. (One of the standard interview questions asked whether people had an ethical stance on the environment and to what extent this drove their decisions and actions: overwhelmingly, the responses suggested considerable idealism<sup>11</sup>.) It is argued here that the club operation actually relied on such idealism and was, to varying degrees, able to exploit it. As the quotation from Ann Link, above, indicates, not all participant organizations by any means, had joined the club because of the inducement of cost saving: evidence of this is presented later in the chapter. Many of the long hours put in, and sheer patience in accumulating evidence of cost savings, can be best explained by the personal commitment to green issues of the university staff employed. The club was also able to benefit, for example, from work done by Manda Helal of WEN in setting up (and actually carrying out the hard work of) composting of waste fruit and vegetables and cardboard from Spittalfields market and enthusing stall-holders there. The exploitation was not entirely one-way, for some gained free (hard-to-find) training in waste minimisation techniques from the project (this was to be a feature in other clubs) and involvement in a successful project was beneficial in terms of job prospects. This independent work led from WEN was more able to exploit *ad hoc* 'institutional spaces' for change than attempts to prevail against the dominant culture and organizational arrangements in which matters were approved at Board level.

#### **(b) conflict of values with community sector representatives**

A clear instance of the willingness of the Board to exploit wider social principles yet their relative unwillingness to confront their contentious implications came with an issue relating to ethnic minorities. The Project Bid had stated that special efforts were to be made to 'target and engage businesses run by and/or employing a significant proportion of ethnic minority staff.' This led to the creation of a category of participating firms as 'ethnic minority' employers. McDonalds was included in this category because of the large proportion of ethnic minority staff which it employed, and this made it eligible for extra financial help. This was too much for the representative from the *Environment Trust*,<sup>12</sup> who was already concerned at features of the project. He explained his reaction when interviewed:

"I thought it was an absolute outrage. I thought, well, this is typical. Well, GOL<sup>13</sup> will go along with this, what collusion! Because the Government Office need outputs, right? And one of the outputs was Ethnic Minority Businesses, and they needed ones that they could put in their tick-box. And if McDonalds is an Ethnic Minority Business I am going to eat this desk. I am not saying that there aren't some franchise holders who are

<sup>10</sup> Differences of degree and character in these professed attitudes are not drawn out here as they are largely irrelevant to this point.

<sup>11</sup> The use of the term 'idealist' carries no connotation of philosophical idealism and is used merely as a shorthand for a person who professes to including environmental considerations as major factors in their decisions and actions. Of course, the responses to the questions registered what people said about their ethics and not necessarily what they did.

<sup>12</sup> a well-established local community organization

<sup>13</sup> the Government Office for London, which administered the SRB grant.

ethnic minority owners, but it wouldn't be what I, you know .. but I mean, this is, there is a whole sort of culture of fiddling the outputs. Well ... I didn't want to sabotage it or say, well, just a minute this is an outrage and you are duping the government because the way they are duping the government is minor to the ways that the government dupes the government, so it seemed to me it wasn't a great deal of harm but .... the *Trust* didn't have to be associated with it." (John Aldenton interview, 9.11.99).

The *Environment Trust* resigned, their letter noting:

"The *Trust* is interested in activities that empower local people to improve their environment. When most of this programme's resources are devoted to consultants' time in advising businesses, and the project's methodology is not a matter for discussion by the steering group, this is unlikely to be an outcome. Under these circumstances, there appears to be little point in our continuing as members of the steering group."<sup>14</sup>

Interestingly, a similar contestation of values was also to cause the resignation of the representative of the community recycling sector in the second case study. The Project Board discussed the resignation; I was not present at the meeting but the Minutes state that they had concluded

"there might be an ideological difference between the *Environment Trust* (concentrating on Community Empowerment) and the purpose of NELWMMP (facilitating waste reduction and savings in local businesses)."<sup>15</sup>

To my knowledge this was not discussed again. The Project Board was thus an arena in which many green activists might feel uncomfortable but where, surprisingly given avowed allegiances of the parties, such concerns were not overt. Ann Link of WEN commented four years after the club's closure:

"It was a bit of a thankless task, really, in the long run... There were some other benefits at the time; we could take advantage of the training which was beneficial as we didn't have many resources at all. We did probably gain in contacts and Manda<sup>16</sup> [gained] from the training, but it was only marginally what we were at because we are not so much concerned with business going green as helping to start up greener kinds of business."

### **Evidence regarding the second case study**

The second case study, given here the fictitious name 'Semplice', had many similarities with the previous club, yet here evidence was gained only from semi-structured interviews with some of those involved in running the club and from some participants; the files were not available and the picture is less complete. Discrepancies in some of the evidence gathered suggested again that aspects of its governance were not as smooth and straightforward as the formal ordering of the club, with a steering group headed by local authorities and the Environment Agency, might suggest.

<sup>14</sup> Letter from John Aldenton of the Environment Trust to the Director of the LEC, 6.1.99

<sup>15</sup> Minutes of meeting of 13.1.99

<sup>16</sup> Manda Helal, a local green activist, see previous page.

The Club was also sponsored by a consortium of 3 Local Authorities in a relatively deprived area and again focused on small firms. A further similarity was the apparent lack of any competitive tendering process for the consultancy. As before, the steering group consisted of representatives from the local authorities, the Environment Agency, the ETBPP, a major company, a local community organisation specialising in environmental issues (this time a non-profit operating a community scrap store for children amongst other initiatives) and local higher educational establishment. Yet there were significant differences, not least in organization and funding. The club was run and operated entirely by a single consultancy (called here Semplis); the university played no part in the management of the project other than having a representative on the steering group. The consultants themselves were on the steering group, recording meetings, setting the agenda and often chairing meetings too.<sup>17</sup> In the first year there were no measurable targets for the club, other than to expand membership nor were there stipulated methods of monitoring and reviewing progress.

Reflecting the consultancy's skills in marketing, leaflets about the club were lively and the settings for some of its meetings novel. The project was widely regarded as a very successful example of a waste minimisation club; it eventually closed when landfill tax funding systems changed. Prior to the club there had been a number of community organizations working in the locality on environmental issues but there were significant gaps in provision, with many smaller firms not knowing where to go for information. Realising this, staff within the three local authorities worked together collaboratively to set up the club. The consultants were already known and experienced in the field, having previously produced publications on the topic for the local authorities and done waste audits in prestigious locations in the area.<sup>18</sup>

There was a formal launch in the spring of 1998, but in effect the club was active in the area before this. Initially meetings of the steering panel were held every 2 months but as attendance was rather poor the meetings became quarterly (without real improvement in attendance). Participating firms received a newsletter which included a club waste exchange feature, and could use a telephone advice line (which was highly-regarded by some small firms). There were also seminars and workshops which gave firms the opportunity to network and to share and gain new ideas, but not all attended these. There was an admirably wide span of participation in the partnership, instigation by a consortium of local authorities, attractive marketing and innovative ways of assisting firms. Waste minimisation was offered to firms as a solution to problems which they faced.

#### **(i) Funding and its influence on the project and its governance**

Whilst the first case study helped 15 firms with a budget of hundreds of thousands of pounds, this club was meant to recruit significant numbers of firms in each borough and was run on a shoestring: the evidence gained suggests that total support from the local authorities amounted to only £15,000

<sup>17</sup> Information from an ex-manager of the club.

<sup>18</sup> Information from an ex-manager of the club

in the first year and £22,500 in the second year. In contrast to the first case, the aims of the club, other than to bring in members, were not clearly specified at first.

#### (a) financial oversight systems

Financial oversight was very different from the complex controls in the first case study. The day-to-day running of the accounts for the project rested with the consultancy. The local authority representatives sometimes met separately to oversee the financial aspects of the club. The core funding from the local authorities was supplemented by further sums from sponsors and from membership fees; it was not possible to obtain either precise figures of costs or memberships lists.

The character of the financial control systems of the local authorities over the consultancies are demonstrated by this exchange in my interview with one of the local authority members of the steering group.

AG: So who is in charge of the accounts for the project?

X: mmm Semplis ..

AG: Semplis themselves? ...

X: ...the actual day to day running is Semplis ..

AG: but who has ultimate responsibility for the accounts?

X: For the actual accounts?

AG: Yes, to say it's done in a proper way... duh, duh, duh, duh, duh?

X: That's Semplis.

AG: But its their project - you are paying them. Who has got to check on what they are doing?

Who in the local authorities, the sponsors, whatever?

X: .. Well, I mean, again, this links back into the steering group, the steering group has .. as you say, if you want to put it like that .. has the total, overall responsibility hands on the chequebook, as it were...

AG: But you don't see the Accounts?

X: Yes, we do .... we see copies of the Accounts...

AG: right... but does that ... does that concern you?

X: It has been a concern, it is something we are looking at addressing at the moment... the ownership of the club .. its been quite difficult .. they way it's developed... as I say, from this fairly simple production of a guide to this club, it has been something that does concern us and we do need to look at at the moment, we have got to try to disentangle Semplis as consultants delivering this service and the local authorities and other steering groups actually funding the club .. We are trying to disentangle that relationship a little, and as you say, it has been a concern.

There was some confusion as to responsibilities; one of the consultancy team reported that the auditing of what occurred was the responsibility of the local authority. Another local authority representative expressed the apparent lack of care in oversight as typical of the 'audit' culture of the time:

"There is an outline of projects and events we need to achieve to justify that we have

attempted to engage with Agenda 21 and this was one of those that ones that you just tick off. You are not bothered whether it works or not; you are not bothered with actually following through, and even at the end of the day analysing why it was successful or failed .. you are just driven, driven by the output... which is tick, tick tick tick .. you ignore that .. whether or not it works you don't give a monkeys about."

#### **(b) means of increasing recruitment**

Much of the governance of the club was concerned with achieving the numerical targets for the recruitment of more members. Whilst the first case study club had had difficulties in recruiting and then worked in depth over 3 years with the same 15 company volunteers, the consultants here were faced with a perpetual task of bringing in new members. The scheme was that members would pay each year to renew their membership (at a very low fee of about £1 per employee per year) and the intention was that the club would become as self-sustaining as possible. Despite the low prices, the brilliant publicity, and a very friendly and open approach by the consultancy staff, it was hard work to attract local firms to join.

Initially those setting up the club had had an expectation of 100 or 150 members but this soon proved to be wildly optimistic. Use was made of a pre-existing local authority database of suppliers, and these firms received a letter and then a phone call. Around a quarter of the original members had already attended waste minimisation events run by the council, and were known by the council members of staff involved. A system was developed where firms could receive advisory visits before paying to join (the fee was in most cases, derisory) and yet some still did not join after receiving free advice:

"...visits were made to them and advice was given about how they could reduce their waste... but they still decided not to join the club... so they got a bit of a freeby... which was something which was quite concerning to all the steering group, on how we can provide enough for people to want to join the Club but not to give everything away, so that they don't say, well, I have got my needs, and they don't actually join the Club."

(interview with local authority representative X on steering group)

(This last remark also reveals the primacy of the project in the thinking of those involved - the concern expressed was that the firm might not join the project and yet was using up project funds, not that the firm may or may not have received useful waste minimisation advice).

By the beginning of the second financial year there were considerably fewer members than had been anticipated and concerns were raised about this. (The figures are hard to establish but were probably for the respective boroughs, 7-8; 18 and 2.) There were also a few members from outside the 3 boroughs which, of course benefited from the funding of hard-pressed councils. After a confidential, and somewhat critical report on how the club was operating, the local authorities increased their supervision. One authority, for example, set a target, requiring them to find 50 members within the Borough and to focus on particular areas. By November 99 there were 91 members but recruitment still occupied the few staff for much of their time. As elsewhere in

London, the waste disposal costs of many small firms were negligible, and Semplis was focusing on solid waste rather than on other environmental savings. Another manager for Semplis suggested another reason: uncertainty as to outcomes.

“... they don’t really know what they are getting aside from what we tell them... and in some cases, they are getting that all the time .. not this particular issue but they are getting sales calls... although we don’t consider ourselves sales persons, we have to sell them an idea... I find that the ones that have a bit of forward thinking are the ones that have thought, in the past, seriously about their waste issues and they are the ones that are most likely to join up because they see right away that they have something that could be reused by someone else or could be recycled... they know that for £20 or £40 it is worth them taking the chance...” (interview 3.11.99)

#### **(c) means of supplementing funding and securing funds for the future**

Both consultancies prioritised actions to secure their current funding and to maximise chances of future funding. In the first case study, actions centred around the need to fulfil the promises made in the Bid Document, and, for the future, to secure good relations with potential future partners and to improve their skills base. For the second club, a pressing need was to secure new members so as to fulfil the requirements of the local authorities, and this could be done by direct selling to firms and by good publicity. Gaining members was a main preoccupation of staff:

“I can remember panicking, every month having to do the totals, and how many businesses had been signed up .. and they had targets for every month and of course it was very hard because some months you didn’t get any and then .. and you would end up trying to call businesses to sign up just to hit your targets .. it was very much like that.” (interview , 1.1.04)

Attempts were made to increase core funding by securing further sponsorship from companies, by seeking out extra sources of funds associated with the club work and by expansion to new sources of grant (using existing skills and reproducing aspects of the format of the existing projects), for the continuity strategy here was replication. This tactic was the subject of some contention: in one of the earliest interviews about this club a senior member of the environmental community organizations in the area spoke scathingly of a system which allowed consultants to ‘come in’ and be paid ‘up front’, in advance of the work for which they received payment, this gave them every incentive to spend time and effort not on the current project but in securing the next source of finance. Further evidence of such contention is discussed in the next section of the chapter.

The consultancy secured some extra sponsorship from household name companies. With the club members it adopted an informal approach - understandably considering the paucity of funding. All firms received the magazines and also telephone assistance should they need it, yet not every firm received a waste audit or training in waste minimisation, which was almost a standard feature of waste minimisation clubs at the time. Instead, the system was that each was offered a half day’s visit if they wished - not all did. At least some of these visits were undertaken under the banner of a separate ETBPP initiative which provided free consultancy to small firms. In this case the free

visits provided advice on waste management and minimisation, and were undertaken in nearly all cases by members of the consultancy running the South London club, so that the very inadequate funding provided by the three boroughs, was extended by 'double financing' in this way.

#### **(ii) Contention, green idealism and the dominant culture of the project**

This section of the chapter considers first, the importance of the work of 'green idealists' for the operation of the club, and second, the development of contention - as in the first case study there was an incompatibility between the values operative in decision-making on the steering committee and those of the local community environmental organization representative.

##### **(a) the crucial part played by green idealists in different roles**

As with the first club, there were several people involved who, from their answers or actions could be considered 'committed greens'. Some of them assisted with the work of the club in various ways, such as speaking at meetings on their behalf. The consultancy also employed a number of enthusiastic environmentalists, some recently graduated, to recruit and advise companies. Their work was often both difficult and trying:

"It was a baptism of fire: you were very green and they weren't interested."

With the club operating on a shoestring, all the employees interviewed gave the impression of having worked very hard to maintain numbers whilst providing a service. A local authority representative on the steering group explained that the low fees had reflected an original intention that the main work of recruitment and enthusing firms would have been done by local authority staff; this had not happened. This thesis is concerned, in part, with the 'Accounts' given by intermediaries of their activities. With both case study clubs the promulgated 'Account' emphasised cost savings for firms; yet the private 'Accounts' given of reasons for involvement in the club stressed much more their personal environmental commitment.

##### **(b) conflict of values with community sector representatives**

Of several issues giving rise to potential friction, funding was central. This was a time when there were rashes of environmental initiatives across some areas of the country, some privately run and some publicly-run, and so often ill-coordinated. Nearly all received only short-term funding with no security of continuity and many were given funds under an expectation that after a given period (often three years) of support they would be able to be self-sufficient. As many grant-givers preferred to be seen to assist new initiatives, those involved with schemes which did not succeed in becoming self-financing would be likely to 'dress them in new clothes' or to abandon them and diversify slightly to gain a new grant. This led to a confusing complexity of schemes on offer to the communities and businesses in certain areas. This competitive context sometimes led to resentments when funding was diverted to newer initiatives. Some interviewees represented the waste minimisation clubs as having displaced earlier recycling and re-use initiatives and voiced concerns regarding value for money of the new choices. (There is no evidence that this dissatisfaction was voiced within the club.)

Another cause for concern arose when, needing new members, the club recruited the nearby incinerator, (the bain of many enthusiastic recyclers), as a member. It was not clear how the incineration firm could or would reduce waste<sup>19</sup>, although of course it might do so in its own offices and administrative procedures. It might diversify wastes higher up the waste hierarchy but as the materials at the incinerator were already wastes - waste minimisation did not apply. To have such a new member was seen by some as an issue of credibility for the club and as counter to its fundamental rationale (although it was defended by some of the local authority representatives). This verbatim account of their reasoning given in interview perhaps exemplifies a more general approach to argument in such partnership milieux:

“... there was a discussion that took place whether we should be... whether [the incineration firm] should become members and a decision was basically made that this is a waste exchange, waste club, offering advice ..[and] if at any point in screening the members should you be saying you are a polluter we don't want you.... although they have looked and are continuing to look to opportunities for adding on a materials recycling service to the actual operation... you see, that's their problem... right from when they first started they have been looking at ways they can, not necessarily move away from incineration but diversify to a certain extent .. yes, .. and obviously .. obligation .. they can't guarantee .. incineration is sort of .. continue the way it is...”

(local authority steering group member, 5.11.99)

Another local authority representative provided an explanation in terms of committed resources: the councils were already committed to providing sufficient combustible material for the incinerator and had difficulty maintaining the supply:

“Essentially the local authority saw it as a peripheral activity, and I believe this was the same in X and Y, secondary to their need to feed [the incinerator] with waste. It was marginal; non-effective, tokenistic. The reason for that being that decisions had already been made previously, as a commitment to [the incinerator]. When the Labour government came in they couldn't adapt that quickly and were still locked in to sending it up the chimney ... , anything else was dangerous to the financial commitment they had made and no-one wants to go for something radically different.” (steering group member).

There was other clear evidence of contention and again it concerned a representative from the community sector. Q, an ex-fashion designer, was running a local Children's Scrap Scheme and was very knowledgeable about waste exchange and re-use, having, on his own initiative, visited exchanges in New York. He was invited to join the steering committee and initially was one of the most enthusiastic participants. He contributed research findings about waste exchange matters which were used by the consultancy, and at least in some editions of the club newsletter the impression was given that his work was linked to, and an extension of, the consultancy's own enterprises. Things soured. There were various issues around the differing ways of operating of the

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<sup>19</sup> Incineration does, of course, reduce the volume of solid wasted materials remaining as a residue

community sector, the consultancy and those based in slow-moving bureaucracies with assured salaries:

“ I was somewhat naive in coming to an organization .. a collaboration .. a partnership between various organizations I am from a small business background and used to thinking from a self-employed, ‘Well, this is what we are going to do, let’s do it’.. I wasn’t used to the talking shop..... so that was very interesting seeing that, but I became increasingly frustrated in the inability to make decisions compared to the way I am used to making them...”

The language in which matters were discussed and presented was also foreign:

“I am used to more down to earth appraisal, not flowering stuff up”

The consultancy did not attend a national Re-use Conference which Q set up, and there were disputes as to whether or not they had been invited. Q began to believe that his enthusiastic voluntary work on the project - intended to benefit the core community he saw himself as serving - had been used instead by the consultancy - which had employed several of his examples in publicity - to develop new branches in other places. He had further concerns at apparent discrepancies in evidence and of inaccurate accounts of ‘win win’ stories. Q’s complaints centred on his powerlessness to get matters either on the Agenda of the steering group, to get answers to his questions about how savings were calculated<sup>20</sup> or to ensure that disputes were formally recorded in the minutes. He was also concerned at the tendency to use projected figures rather than exact figures in making claims. Like the community organisation representative in the other case study club, he complained that he had little influence on decisions, and was unimpressed at the controls exerted by the Councils.

“My concern is that the Councils don’t know what the line is between running a non-profit or.. just running a business for your own gain, and this time I hope there will be some guidelines. Obviously there are factors like recycling officers being very busy, but the winners from that seem to be the people running the waste club because they can use it for their own devices because there is no-one challenging them” (Q, 23.10.99)

Eventually matters rose to a head and he was asked to leave by the consultancy. Thus at neither of the case study clubs did the concerns and the scruples of the community representatives match those espoused by the consultants and steering committees.

### (iii) Symbolic displays of the dominant logic of cost saving:

Evidence has already been set out suggesting that the local authorities were using the initiative as a symbolic display which could assist in its mandated requirements to show activity under Agenda 21. The final remarks about the second case study club concern other symbolic displays of what were espoused dominant logics concerning cost saving. Further recruits were a priority for this club, thus their marketing - their claims-making about what was possible for firms if they joined - was very important to them. To take one example, its early publicity leaflet featured results from 6 organizations which had benefited markedly as members from simple but innovative ideas for

<sup>20</sup> He claimed to have asked 5 times how the published savings for the club overall in the first year were calculated, without receiving an answer.

saving waste. I was to find, by chance, from my interviews, that there was good reason to question the detail for three of these. (I did not explore, and had no involvement with the other three).

1. A local cultural facility with large gardens was recorded as having saved £12,000 per annum by diverting 75 tonnes of green wastes from landfill, and composting it, making further savings by not having to buy peat-based composts as a result. This was a committed environmental organization and the garden manager, a very experienced horticulturist as well as a 'keen green', was enthusiastic in his praise of the project. The club had held a seminar at the facility on his first day in post in October 97 and his organization had joined three or four months after that. He felt that being involved in the club had somehow reinforced his own views and given him permission to pursue a range of environmental initiatives; he retailed how the long-serving staff had been sceptical at first, there had been a need to put in an immense effort into education and to demonstrate a system that both worked practically and assisted the environment before their opinions changed; they were now really committed.

"The recycling is now something that I couldn't withdraw because the staff ... heads would go down .. it is a part of the way that they do things ... it is a part of their awareness to the environment .. part of what they do in horticulture .. so ..so now they are really pleased .. they are really pleased."

The following statement shows his perception of saving waste as an ethical issue:

"What it did do is that it confirmed what I had started, you know... there is a fine balance between doing something for money and doing something for the moral things ... you know... If you want to say moral, well, it is a moral issue ."

The third day after his arrival he had started the compost heap.

"I came here in October 97; in fact, it was the third day, I think, we started the compost heap."

He had not had training on this from the club, he had relied on his own professional experience:

"One of the reasons why I didn't was that it has always been a long-standing thing within horticulture anyway."

When asked about the savings, he said he had not been given any guidance on measurement of savings or waste from the club:

"We produce 200 cubic metres a year... .. and if I had to buy this .. it works out about £7,000.. And I just equated this amount with the figure of £7,000, so it is not .. . so that's how I worked it out .. you could call it a saving, whatever .. it is just that I have got this large amount at the end of the year..."

Towards the end of the interview he had showed me a draft paper about the composting at the facility being produced as a case study about the successes of the club by ETBPP (CH214) which described the savings on skips as worth £4,000 and the product as being worth around £7,000. He was described as having commented about his experience of the changes but the publishers had in fact *changed his words* and he explained this to me:

"They have changed the quote... but it's not environmental .. I am talking about recycling ... I have always talked recycling... so that's why I had to rewrite the quote..."

At the end of the interview he was called away, and I was taken around the composting area by one of his staff instead, who was, as described, both pleased and very proud of what the gardeners had achieved. He confirmed that changes had been made almost as soon as the new manager arrived, and recalled years before how they used to compost all their green wastes, but this had had to cease when the council, (one of the three supporting the project), had sold off the land which the museum had used for this purpose, making composting under the old system impossible. Thus whilst the restitution of composting was very creditable, helped reduce the production of harmful effluents, saved the gardens money and the club supported the change, it could not be said to have been caused by the club, nor could the savings be said to have been carefully measured, nor the best practice descriptive leaflet about them to have been accurate.

2. The stores of a major British art gallery were reported in the leaflet as having saved 50 large packing cases (7.5 tonnes) from landfill as they were being re-used by artists locally. This would reduce 'overall consumption and reduce [the] potential threat of air pollution from incineration.' By chance, one of my interviewees had taken the packing cases from the gallery, where one of the then managers ran re-use projects with different artists and craftspeople. The gallery's picture transport cases were of plywood and very heavy and thus potentially quite valuable; they used around 200 tonnes of crates each year. They were very bulky and in order to move them the interviewee had had to get in special equipment, eventually, with great difficulty, shifting about 2.5 tonnes. He recalled telling the consultants that "It was a nightmare"; he had lost money as it had taken so long. He had been unable to find new homes for some of the crate materials but this had not been acknowledged in the leaflet and instead the exchange was recorded as a success. There had been no more loads after the first one.

3. One company was listed as having saved £2,000 by not sending 6 tonnes of bicycles and parts to landfill. The consultants had arranged for a charity to export them to Haiti and claimed commendably that this would 'improve the lives of Haitians, giving them a cheap and environmentally sound form of transport.' Yet it was difficult to see how the figures had been arrived at (the disposal cost implied was over £300 a tonne, and the bikes, would, in any case, have had reasonable scrap metal value at that time). Again, the detail of my interview with the owner of the firm responsible presented a more complex story than that of the leaflet. He was also a committed environmentalist who disliked waste and this had prompted his membership of the club, about which he was very enthusiastic:

"I don't like seeing usable things being wasted... if it's practical to continue to be used, then carry on. "

He had acquired, as part of a purchase, a load of around 600 old-fashioned racing-type bicycle frames made from heavy gauge steel. These, he explained, were unmarketable. The consultancy had arranged for them to be exported by a charity and had arranged photographs of this.

"The reason I was prepared to give them was I could see there being publicity through doing it ... there was a feel good factor that our customers want to see, us being good and helping other people and being environmentally friendly at the same time... and we

had a lot of publicity through that .. if I had got 4 or 5 listings in the paper, or publications going out in [the] Council's brochures, and 1 or 2 clippings .. then if I had got £600.. a £1 a frame, or so, then I couldn't have afforded that publicity."

Thus he had been mindful, not only of the potential benefits of the cycles for very poor people but of the publicity value of the gift. His willingness to forego payments in order to help the environment and those in need is praiseworthy, however this does not provide a straightforward example of 'win win' cost savings achieved for firms by diverting materials from the waste stream. In fact it was diversion of materials from recycling to reuse at a cost, creating benefits in terms of publicity gained. The firm was not unusual in doing this. An employee of the consultants later commented:

"I don't think the cost thing is the right issue for most people.... you have got a few that do it for the cost, but the costs are so small, the savings are so small for the effort you have to go to, so most of them do it for PR and I think that's excellent really... [This] is such a competitive environment; you are not going to make your business successful just because you reduce waste - you are going to make it more successful through a marketing campaign or whatever... it is going to be such a small proportion of businesses that really can make significant savings and if they are operating so inefficiently anyway, they probably wouldn't be .. able to survive [here]."

As with the first case study, in many ways it seems churlish to make an issue of discrepancies about such small sums given the size of the government investment in greening initiatives for industry. Yet these differences are matters which would not, for example, have been seen as insignificant in the normal run of affairs in local government. Such organizations, regularly held to account by the courts and central government, operated in ways that required evidence to be checked diligently (for example when serving notices or preparing for a court case). Thus the ways in which the consultancies were prepared to work reflected their different traditions and expectations of what was acceptable. Also, (as will be argued later with reference to the construct of 'Accounts') this willingness to ignore qualifiers to the success story about the club in the effort to make the right impression of success, which would confirm the 'win win' expectations and hype around the clubs, cumulatively, shifted expectations. If all the reports about the clubs, the Accounts of them, were of entrancing success stories, without qualifying detail, then this would have ratcheted up so that success in and from the clubs began to seem inevitable and commonplace, and this expected concomitance may have further reinforced the tendency for some intermediaries to be less than precise with what they reported in an effort to conform to expectations, which itself would have been reinforced by the grant regimes on which most clubs were dependent. Some claims were recorded which suggested that this occurred elsewhere, (and are discussed in the penultimate chapter) but there is no evidence that such approaches were widespread; later Envirowise was to instigate a system of audits which provided a means of checking on claims.

There were further institutional reasons for the poor controls. The constitutive rules concerning the steering committees were vague; for many of those concerned, this was the first time they had sat on

such a body and they were unclear of their exact role. They took their cue from the behaviour of others. Personally, as a steering group member, it never crossed my mind that a proportion of the 'win win' stories might be hyped until I was given direct negative evidence from several parties; nor did I insist on audits of claims. The relationship of many of the member firms with the clubs was tenuous; they might leave if what they claimed was disputed; in any case, the evidence from my second case study suggests that it was not the firms which created such neat narratives of success, but their production arose from a combination of circumstances in operation in the absence of clear guidelines as to how assessments should be made. Further, within the steering group the mode of operation was a comfortable and relaxed one, I and some other members challenged the consultants from time to time, but this was only for periods of some 10 or 15 minutes within an occasional meeting at most; the attitude of a scrutineer was counter to the whole tenor of the meetings, and destructive of the good relations with other partners which my organization expected me to develop. Beyond the steering groups, there was also, at the time, a strong culture preferencing 'good' stories and glossy leaflets over older-style and more pedantic retailing of details where matters were, as is the way of the world, only partly successful.

### **Discussion and ensuing questions**

This section considers first, the evidence presented about modes of governance and the importance of grants; then the role of idealism in the projects and the consequences of having disparate ways of thinking about what was being provided, setting up questions to be considered in the final two empirical chapters; finally it considers the influence of the project form of organization and the longevity of the effects of the interventions.

It has been argued in this chapter that the predominant mode of governance for each project was to ensure compliance with the stipulations of its funding organization, and the 'Account' presented was constructed to meet this need. In each case resources were diverted to meet specific demands of funders: in the first case study disproportionate effort went into demonstrating the spending of capital allowances and creation of new jobs; in the second case study exorbitant efforts went into enrolling new participants. The clubs were overtly about pollution prevention; in many respects they were 'about' the business of those running projects receiving grants.

These findings are largely in accord with research by Newell et al. (2001) in respect of their findings concerning grants promoting diffusion of 'best practice' techniques<sup>21</sup>. The funding practices presumed that a process of awareness raising and dissemination could and would result, in a straightforward way, in widespread dissemination of an (assumed) 'best practice' approach. To facilitate this and ensure good use of funds, funders fostered grant applications which would promise them 'certainty' of outcomes - via specified 'deliverables', a precise project plan and stated benefits. In effect successful bidders were expected to provide firms with a package of

<sup>21</sup> In fact, they critique grant-giving practices for academic research on management techniques.

“simplified, portable and therefore, necessarily decontextualised ‘best practice’ management techniques and approaches”(2001:103). The dissemination process was then driven by the specified deliverables with much effort being put in by those involved to “create the appearance that ‘things were going to plan’” (p.114). Newell et al. point out that such an approach ignored the variability in firms’ needs and cultures, the fact that the outcomes of any such intervention must necessarily be uncertain, and the necessity, if assistance was to be beneficial in the longer term, for careful transfer and translation of ideas and practices into pre-existing contexts. Instead, the focus became the carrying forward of the grant ‘packages’. In fact it was difficult for firms’ managers to evaluate whether what was proffered would be relevant to their particular set of problems and would constitute the best return on time and resources, yet the expectation was that one ‘package’ would suit all and that prospective users would find implementation simple. The approach diverted attention from discussion of ideas and the necessarily complex details of adaptation processes. This has resonance with the clubs .

In addition to these factors, there was a strong expectation that the projects would be a success - and this, in turn, influenced management practices. Project staff were busy complying with the requirements of grant, and most steering group members, each engaged with a project for a very short timespan in otherwise busy lives, would have had little expertise or access to the firms attempting changes and to their detailed concerns, and in any case probably perceived their roles rather differently. The involvement of many parties from many different organizations might ensure careful oversight of the spending of grant monies, but from this evidence there was no ‘institutional space’ or role prescribed for consideration of outcomes more widely. The evidence from both case studies suggests that the systems of governance were intimately linked to the organizational form used and the intermediaries were influenced by the need to secure a continuity of further projects for the future. (Signs of this motivation and attitudes around it were labelled here the ‘string of pearls’.)

The formal ‘Account’ of the work of the clubs implied that the process was simple and straightforward, if rather wonderful: membership of the project would create beneficial results in terms of savings for participant organizations. The researches and participant involvement here revealed that the clubs involved a great deal of hard work, long hours and commitment in difficult situations by many, including managers, assistants and project managers. Exploit is perhaps too hard a word, but the projects benefited hugely from the labour, persistence and enthusiasm of people (numbers of them from participant organizations) who were committed, in one form or other, to long term sustainability of the planet. Little was heard in gathering evidence about these higher ideals; they were only revealed in the final questions of the interviews and [confirmed] in what people did. The strong impression gained was that the standard ways of speaking and talking in the projects were much more along ecological modernist lines that the projects were beneficial in terms of cost savings for firms. This way of speaking and thinking was reinforced in the first case study by a reluctance to voice overt disagreements (This accords with findings of Poncelet (2001) on practices of conflict minimisation in environmental partnerships, associated in part with use of

predominant discourses of ecological modernisation). It was not possible to observe the partnership in the second case study at first hand but the evidence suggests that in both cases only the representatives of the environmental community sector, used to operating under different conceptions of identity and purpose, violated this practice to any extent. And even here, the London Environment Centre representative 'left quietly'; for those not present at the subsequent meeting it was as if his going had caused barely a ripple. In both case studies, the community sector participant left on grounds relating to the making of preposterous claims, and from a perception that they were powerless to influence the course of the project or to get explanations of how decisions had been made. Alongside this real anger there were possible further causes for contention in the case of the second case study. The suggestion was made by a local authority representative that the local authorities' aims for the project reflected their own needs to display successful engagement with the business community to fulfil numerical quotas of Agenda 21 activities and to protect their prior contractual arrangements regarding routes of waste disposal. This may not have been the case but even one counter discourse - what Tilly, (8.9.05) citing Goffman, has called 'Rim Talk': the whisperings where there are discrepancies in framing of accounts - was enough to weaken the real legitimacy (Stinchcombe 1997) of such a project whilst perhaps not impinging initially on its *legitimate appearances* to those others in the intermediary and grant-giving community who had been influenced by the received 'knowledge' of the club and whose 'scripts for action' comprised their expectations about relationships appertaining in this type of organizational entity (Clemens 1996: 210-211).

These considerations link to the perceived powerlessness of the community sector representatives, even when they felt so passionately that things were not right, to modify the predominant ways of operating of the project boards, and emphasise the fact that it was those intermediaries who set up and managed the projects who had most influence on what happened. It underlines the need to understand how this influence operated, what motivated them, and the constraints and opportunities which shaped their actions. These are matters which will be pursued in the next two chapters after the final section here which concerns the longer term efficacy of the use of projects. The evidence presented suggests that the organizational form used - that of the short-term partnerships 'best practice' project - did indeed act as a frame for opportunities, repertoires (especially repertoires of what kinds of views were expressed) and collective orientation, bolstering some adopted identities, setting up modes of regulation and forms of action for the [temporary engagement of the] intermediaries involved, (Clemens 1996:210, citing Bourdieu 1977) and went some way towards creating a normative model of action for them. But was this way of organising and acting, which might be longer term for them but was a mere temporary intervention for participant organizations, capable of effecting lasting change? There was busy claims-making to demonstrate legitimacy to further intermediaries and to the grant-givers and potential grant-givers. Yet despite the simplification of the overt Account, there appear to have been considerable differences of culture and understandings between those running the projects and the general small business community as shown clearly in the remark of Q about 'flowery' talk, (and to be discussed in the next chapter). The project teams did have some status but some interviewees suggested that this was far from sufficient

to influence opinion in the communities or to manage large-scale debate. In both cases, the transient organizational form of the project provided very little allotted time for convincing and counselling, and this was heightened by the short duration of many in their posts, in the conditions pertaining at the time. Perhaps this mode of action was not one which had the capacity to translate over ideas and practices to those large numbers of firms not already drawn in towards concerns over ecology. It is possible, however, that it was effective in reinforcing ideas and practices in those organizations which were already sufficiently committed or open-minded to participate. This question is addressed in the final section of this chapter which returns to the first case study club to examine evidence concerning the lasting effects on the participant firms.

### The longer term influence of the first case study club

The North East London Waste Minimisation Minimisation and Management Project had been very successful in achieving its aims during the period for which it had funding: what difference had the Club made to the participant organizations three years after its closure?

NELWMMP began with fifteen members; by the end there were thirteen. One of these was very exceptional - the Women's Environmental Network (WEN), a national, fiercely green, campaigning organization - which might have been assumed to have been producing little pollution in any case. Others were also unusual members for waste minimisation clubs - a company managing the local market (at which a member of WEN worked), a local college and the Bromley-by-Bow Centre, a pioneering centre which provided arts, health, educational and environmental resources for the community. Other members were Spitalfields Small Business Association, a largely Asian group which ran several self-help initiatives including a micro-credit scheme, and Bootstrap Services, an innovative centre which helped to find work and training for people who were without jobs. A leisure centre and a furniture maker dropped out during the course of the Club. There were 4 other manufacturing firms: Britvic Soft Drinks, Pigments Ltd., P. A. Finlay, and Kendons Packaging, and two restaurants - the local McDonalds and Café Spice, which was owned by the redoubtable Cyrus Todiwala, a deeply committed environmentalist who had grown up in an area of water shortage in India and then witnessed serious environmental harms when working in Goa. The final member was a timber importer, James Latham.

All the organisations were telephoned. The first question, asked before the waste minimisation initiative was mentioned, asked what kinds of things the organisation was currently doing to protect the environment. This response, from a member of staff at Pigments Limited, was not unusual.

“At the moment, not a lot. There has been a big turnaround with a lot of redundancies, and I don't know... We haven't got anyone who does that anymore; the person who did that got made redundant.”

The Bromley-by-Bow centre initial telephone response was a variant on this:

“err.... off the top of my head... we have got a Furniture Group that makes furniture out

of recycled wood... we do a bit of recycling of waste... I will ask a colleague.[PAUSE]... She is struggling as much as I am. We have a Parks Project with some recycling aspects but nothing in a major way."

In the majority of organizations contacted there was a difficulty in tracing the person responsible for environmental issues. As at Pigments, there was no legacy of environmental activity at Kendons Packaging, which had been one of the firms most committed to the project; the two women who had come to the club meetings had left. None of the organizations for which the question was appropriate stated that they had ever been approached by other firms as to how they achieved their savings (one of the reasonable presuppositions of dissemination about the clubs).

For some, the reason that waste minimisation issues had not been pursued was a lack of congruence in the organizational culture with the suggested practices from the project. At the Bromley-by-Bow Centre, whilst recycling of toner, paper, etc. continued, Elaine Hamling, who had for a short while been the Project Champion at the Club, admitted,

"The truth is that the waste minimisation programme that I went on all those years ago was not geared to the kinds of things we do."

She explained that they were focused on issues like health, not manufacturing, and referred to the initiative as having been much more applicable to manufacturing firms. Bootstrap Enterprises also implied that the 'curriculum' of the Club had been rather inappropriate for their help for the unemployed, and rather modestly played down the extent of their current environmental agenda - they were engaged in creating recycling initiatives for old computers and had helped to set up firms to further this work.

In complete contrast to this, some organizations which had been peripheral to the activities at the Club reported that they were now very committed environmentally - yet it is difficult to attribute this to the originating cause of the Club. Tower Hamlets College had targets to meet concerning energy and water consumption, tracked usage patterns, linked its contracting and ordering to its environmental targets and had employed a private consultant to help set up its recycling scheme. The person responsible, Mrinnoy Borooah of its Estates and Contracts Department, had been appointed after the club so had never had feedback about it - and showed a positive and wonderfully resilient attitude to the task of greening:

"It's going and we're getting stronger.... it's slow going at times and sometimes you don't have many people listening to you, but if you give up you have wasted all the effort you have put into it."

Some companies which had been members were pursuing vigorous environmental agendas, but again it was difficult to attribute this to the experience of the Club. At the local McDonalds, Peter Iles, who had been the Club Project Champion there, had left, and on telephoning I was told that no-one at the local restaurant knew anything about it, and, rather sadly, that the speaker remembered a picture of Peter getting an award, but that was all. I was asked to telephone the national

environmental manager for McDonalds UK. The manager had been appointed two and a half years before and was most positive:

“Waste minimisation has moved to Head Office and is something we are always looking at, as it makes good economic sense as well.”

McDonalds Head Office had now set management procedures for a range of environmental issues, including how waste should be handled; all cardboard was recycled; they were carrying out further waste initiatives on a voluntary basis at some local outlets. Their focus was particularly on the supply chain and not on gaining any form of certification:

“A formal EMS is not that useful for our business; it takes an enormous amount of time and administration without necessarily gaining anything important by it - we need to get the changes happening on the ground, rather than on a piece of paper.”

Britvic Soft Drinks had experienced major successes with the club and was still very active in improving its environmental performance. Their Environmental Officer was in the process of trying to gain ISO14001. They had achieved a major target, which was to ensure that no liquid effluent was sent to landfill with solid waste, and they now shredded all waste plastic bottles and treated the effluent on site; this had resulted in their being a national runner up in the *Green Apple* award. Britvic prioritised work to change attitudes, which they felt was one of the hardest things to achieve. However, the Environmental Officer could not comment about the Club - having been appointed only a year previously, and didn't know of its existence until my call.

Similarly at P.A. Finlay; representatives from the firm had recently attended two seminars run by Business Link and the London Environment Centre and were taking vigorous measures to minimise paper and power usage. The motivations for this, however, were difficult to link to the Club, for the person most centrally concerned with environmental issues did not know of its existence; she had been aware that the firm had achieved some sort of award in 1998, but did not think that had been a club. They had moved premises and their new neighbour had “passed the Greenmark award, and we wanted to.” They were also prompted by the level of dumping in their area and because

“For people who do work for lots of the local authorities, it's very good to say you have attended seminars and you are monitoring things.”

James Latham, the timber importer, was still heavily committed to environmental issues and was the only ex-member of the Club for which this was true which also gave the Club considerable - but not sole - credit for assisting in the process. They had found the Club very valuable and had shared Best Practice co-operatively with a small group of the members - Kendons Packaging and Pigments. Andy Duffin, who had been the Club Project Champion was still in post but at a new base in Bristol, for the site in East London had been sold. He commented:

“At the time it was fine; it gave us some time out of the office to think about things we would normally not think about.”

A number of drivers had operated on environmental issues; a major one had been the role of the Worldwide Fund for Nature, which had impacted right across the timber industry. The timber

industry generally had shifted from overwhelmingly importing tropical to less than 20 per cent; there had been a shift in consumer demand to temperate timber, too. Traceability was very important and could be “a nightmare because of the way that some of the borders are policed;” they were working with some companies that focused on traceability. All their departments already had the certifications expected in the UK; there was more work to do, however, because the compliance schemes in the U.S. were based on a different system and gaining certifications was an ongoing process.

The person who had acted as Project Champion for the Spitalfields Small Business Association, Edith Okuth-Awuor, still worked there and reported that their approach was just as before, and rested on good habits. They recycled and re-used everything possible. Whilst the Club had been responsible for helping them to reduce their rubbish collections from 7 to 3, and people from the Club had come to talk to their clients as well, adding to their membership role;

“It was brilliant; it was really good for us as well.”

yet when asked what were the lasting effects of the Club for them, she replied that

“We would have been doing it anyway.”

The final three organizations were refreshingly and uncompromisingly green - but might have been expected to be so in any case. To cite Cyrus Todiwala of Cafe Spice,

“Waste minimisation is something we take very seriously, so club or no club, that continues. But not necessarily from the club. The commitment was inborn.”

The club had helped them “to put a few things in place and helped us to understand what help is available.” They had been able to take advantage of the grant offered to install a grease separation system from which the oil went for recycling but he stressed that waste minimisation in fact cost small companies money:

“There’s a lot more awareness, but I don’t know what is happening, what commitment there is, because any form of waste minimisation in the UK costs you money. I don’t think it is happening. We spend a lot of money on waste minimisation; of course there are [matters] on which you can make savings, but other aspects, if you take it seriously, cost you money.”

Ann Link, the promoter of the Waste Minimisation Bill, which became the Waste Minimisation Act, had sat on the steering group of NELWMMP, of which WEN was a member. She had regarded it as a learning experience but had found it

“very frustrating; I was very new to all this.”

The free training in waste minimisation techniques given to participants had been very beneficial as they had been short of funds. The contacts had also been useful as had a study carried out on the potential for using a communal dishwasher by the food stalls at Spitalfields market. Yet, like other organizations, it had not fitted their own mission and style of work.

“It was only marginally where we were at because we are not so much about business going green as about greener kinds of business.”

Manda Helal, the representative for Spitalfields Space Management, who also worked for WEN,

had set up an innovative composting scheme for the market based at a local city farm. She had found the club worthwhile, and had greatly valued the training from March consultants. (The market was currently closed for redevelopment.) For her the main effect had been to realise that to prevent waste she had to put out “clearer and clearer messages ... to prevent it in the first place.”

To summarise, of fifteen member organisations, two had left before the end of the project. Two further manufacturers had ceased to have any environmental programme. Two more were carrying out recycling initiatives, if not doing more, but considered that the club had been inappropriate for their type of organization. Spitalfields market was no longer running, but its Project Champion, like other committed environmentalists, accounted for 4 further respondents who would have been taking action, serious action, on resource efficiency issues in any case. Four organizations were taking forward responsible environmental programmes, some of them with great tenacity and initiative, yet none of those responsible within these organizations was aware of the previous club membership. James Latham, the timber importer continued with its environmental programme but was conscious of other drivers, not least the sea change there has been on tropical timber as an environmental issue.

As part of the steering group for this club, I witnessed the seriousness, care and commitment of the team working with the member companies. The general perception by those involved was that good work had been done. These results are very disappointing. They raise questions of whether, in a work environment where people and firms are so changeable, a short-term project basis for securing environmental change is an appropriate one. The perceptions of some ex-members that the club was not appropriate for them also suggests that if such projects are to run, either the approach is customised to suit the cultures of the various member organizations or membership confined to organizations which do fit the assumptions of the assistance provided. If the effects were so short-lived amongst the member companies, there are further questions concerning its wider value as a spur to other firms to take such actions without the benefit of grant-aided outside assistance. As Cyrus Todiwala pointed out, many waste minimisation initiatives are costly to firms, despite the ‘Accounts’ emphasising cost saving. If these interviews provide a fair analysis of the activities within the firms at the start of 2004, then it has to be concluded that the project failed. I conclude this section with an observation, again from Cyrus Todiwala, which underlines this point, and draws a distinction between taking action for one’s own self-interest and the need for wider change:

“The wider environment has to be the key issue, not people’s own mission. The Project might support 8 or 10 different salaries, but it has to be wider - the important thing is community awareness, public awareness is the key, in the schools and in the homes.”

The project failed to provide this.

## Chapter 6. Intermediaries at Local and National levels

"Whom shall I send, and who will go for me?" (*Isaiah vi.8*)

Having considered evidence from the case studies, this chapter and the next examine four different types of intermediaries involved with the clubs. These are the organization contracted to promote waste minimisation nationally; the Business Link Environmental Advisers; academics from three of the universities which undertook work with the clubs; and the regulatory body, which also ran clubs in some areas. In each case the club initiatives were only one small part of the main organization's portfolios of work and in some cases the individual intermediaries were working at the edges of the official strategy of their organization. The chapters present ways in which the institutional circumstances of each organization-type, especially their pre-existing relationships and concurrent routes for obtaining resources, and those of the individuals who acted as intermediaries within them, influenced the operation of, and presentation of, the projects. The evidence presented is drawn from interviews, secondary documentary evidence and, in regard to Chapter 7, in part from participant observation.

This composite chapter is ordered in the following way. It begins with a brief overview of the positioning of the intermediaries, practically and theoretically. The empirical evidence begins at national level with the intermediary body ETBPP/Envirowise, viewing the outsourcing contract which created this organization<sup>1</sup> as one of a type increasingly modish for Government Departments at the time. Then intermediaries operating at local level are considered - first Business Link Advisers and second, intermediaries from universities and colleges. These examples are taken from three Envirowise Regions - London, East Anglia, and the East Midlands. To draw out different aspects, the section on ETBPP/Envirowise focuses on the institutional aspects of the outsourcing contracts, the processes which instigated, then developed, and then structured, strong involvement with further intermediaries at local level in the clubs, and how this linked, or rather did not link appropriately to provision of power and modes of oversight. The section on Business Links describes the jumbled jurisdictions operating at local level, the constraints this presented and the centrality of certain forms of networking in what occurred. Institutional analysis often overlooks the individual agent; the section on universities focuses on three academics in very different circumstances. It is not argued that they are representative, but that each exemplifies particular responses occurring more widely, regarding approaches characterised as 'relative freedom to

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<sup>1</sup> Neither ETBPP nor Envirowise was the name of a pre-existing company but merely the contractual name to be used by the successfully tendering intermediary in running the national contract to encourage waste minimisation, (which included promotion of waste minimisation clubs).

operate', 'entrepreneurship' and 'consciousness of second-best by green idealists'. The last section of this chapter briefly summarises the findings before the subsequent chapter turns to the final intermediary type explored, the official environmental regulator and some regulatory issues posed by this excursion into voluntarism. The penultimate, discussion chapter draws together these findings, considering how the activities of these contracting and associating parties might be construed in relation to constructs of institutional theory.

### The intermediaries and their positioning

This thesis contends that voluntary regulatory initiatives are accompanied by an opening out of opportunities (in the terms of McAdam, Tarrow and Tilly) for categories of people often working at, or outside, the 'curtilages' of well-bounded organizations. They move into arenas where change is sought and engage in short-term tasks, interlinking, encouraging, setting up new systems, and evaluating progress, then making claims about what occurs - sometimes mixed with encouragement for burgeoning ethical orientations for participants and would-be participants. It is further argued that such a system, predicated as it is by the resource needs of this mixture of parties, and hampered by institutional constraints acting upon them, presents consequential difficulties in the regulation of voluntary regulation and the conclusions which should be drawn about it - in particular its ability to effect lasting changes.

It is important to emphasise that the notion of intermediary is a relational, dynamic one and not a static category and this may be why they escape our notice. One group may specialise in a small range of tasks, or its position within a given nexus may make certain tasks easier for it to perform. Some occupational groupings, and they are of particular interest here, perform work in this range serially, taking on, as it were, 'piece work', in the form of a string of contracts (here, in the form of grants) in each of which they gain resources. There is a potential fluidity of roles about such activities, a certain lack of clarity, even for those enmeshed in the arrangements, about what they may do and what they may not - there is no notion of accustomedness here - and this makes the idea of constitutive roles in such patently short-lived circumstances uncertain. Legitimacy, too, has a different cast: the temporary, fringe and marginal nature of the activities, means that for those people with a deep-rooted intellectual framing which sees "the organization" as the central interest, the tasks, and those who do them<sup>2</sup>, are *ipso facto* peripheral, never quite reaching the same levels of clarity and focus of the enduring organizations for which they act or which they assist. We 'see' the government departments and the targeted firms, they are categories and constructs we are used to being interested in and we have many concepts and ideas to link to whatever is said about them. The disparate groups of intermediaries, perhaps assumed to act rather as servants in relation to the organizations where things are to be achieved, are not such interesting and resonant constructs in our thoughts.<sup>3</sup>

<sup>2</sup> Generally only a handful of individuals from any particular organization worked directly on any one initiative.

<sup>3</sup> And this is, of course, related to our own institutionally-derived cognitive practices. In the same vein, Amy R. Poteete writes of institutions influencing the attentiveness there is to ideas (2003:527).

This disjuncture, linking both to the dynamic and relative lack of constraints on what was being done, and to our perceptions of them as different systems (which may be defined in terms of different normative worlds), goes to the heart of what is to be explored in the next two chapters.

### The ETBPP/Envirowise Programme

As explained in the Policy Chapter, ETBPP, the precursor of Envirowise, was introduced as a technology transfer programme focused on introducing waste minimisation and cost-effective cleaner technology by voluntary means. There was no access to the contracts or to minutes of the body managing either contract, (thus precluding analysis using Agency theory), and this section uses evidence from interviewees, observations at events and secondary evidence, much of it published by ETBPP or Envirowise, often referred to here as the 'Programme'.

This section discusses the close institutional relationships between the parties to the original outsourcing contract, the centrality of intermediaries from the first, and the way that their engagement was sought, secured and developed in an increasingly structured way, and the successful use of marketing to create expected ways of thinking about waste minimisation issues amongst the local intermediaries. The consequences and concomitants of this success and institutional background are then explored: first, Envirowise' role as a respected pivot between government and its (slightly distrusting ) targeted audiences; then the reliance on established modes of governance for the club parts of the Programme (despite the new conditions brought about by deployment of intermediaries). The final paragraphs of the section introduce ideas of how these activities and engagements might be construed in theoretical terms, especially in regard to the regulatory aspects of ideas-spreading by use of heterogeneous projects run by 'folk'.

### The contract establishing the Programme and its presuppositions

The original ETBPP contract was won by a company well within the government 'stable'. On privatisation, some years before, the old Atomic Energy Authority had been split into UKAEA, which remained a government organization, and AEA Technology plc. This new consultancy took in some staff from the old Warren Spring Technical Laboratory (which had included the government's think-tank on waste). AEA Technology subsequently won several Government contracts, including the contract to run the Government's Energy Efficiency Best Practice Programme, the Air Quality Information Service, the UK Hydrocarbon Monitoring Network and, in 1994, ETBPP<sup>4</sup>. This produced a situation where the privatised agency was, indeed, close in understanding to the ways of operating of its clients, for all had their roots in the same institution. Some activities within AEA Technology, took place using the name of the Energy Technology Support Unit, (ETSU). ETSU had been the principal source of scientific advice to the old Department of Energy.

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<sup>4</sup> In both cases, the successful tenderer took the project name for the duration of the contract.

“ETSU... is a brand name; it doesn’t exist as an entity within AEA Technology; nor does the National Environmental Technology Centre, so it is a fluid group of people whose activities are branded.” (interview with Mike Walker of ETBPP, 23.4.99)

Environmental services were sold to the government by AEA Technology by another part of its organization, the National Environmental Technology Centre (NETCEN); again, this was originally the name used for a national body providing independent advice. In 1996 its Director explained its three roles:

“to help the public sector ... develop policy; to help the public sector develop programmes, and the development and implementation of networks” (Environment Business Magazine, July/August 1996, at p. 9)

ETSU, which ran the ETBPP contract, was separated from the rest of the organization by ‘Chinese Wall’ arrangements, with separate computers and administrative arrangements. Financial monitoring could thus be handled at the main building in Harwell, (which was let, incidentally, from UKAEA). This use of previous government-body names signifies the position and assurance of the newly privatised company vis-a-vis government. It also conveys a certain style of operations, a certain promise, that even if outsourced, things were designated with the hope of continuing in established and familiar ways. Mike Walker, then head of Marketing for ETBPP, summarised the arrangements:

“We are like a government department, effectively commissioning research rather than DETR or DEFRA doing it themselves.”

His use of language suggests the comfortable quality of organizations which cohabit easily.

This mode of outsourcing was not unusual. Rhodes (2000:255-265) suggests that by this time government departments were often contracting out implementation tasks to the private sector, frequently to special-purpose bodies.<sup>5</sup> Evidence from interviews also confirms this: Robert Lowson, then Environment Strategy Director of DEFRA, remarked (interview 18.5.05) that

“ .. for a very long time it was the first instinct of the old DETR when faced with new requirements to say, ‘Who do we get to do this?’ ”

He explained that outsourcing was seen as a way of benefiting from specific expertise held by an organization, as the contractor could concentrate on a single issue; he emphasised that such benefits depended upon clarity of objectives and means of effective measurement. Rhodes comments that such outsourcing led to replacement of single hierarchies with a fragmented but interdependent system where the distinction between public and private was obscured and the central departments had diminished control over what was done (Rhodes, 1997:100-1). That contracts should be let to ex-associates is in line with remarks by Jerry Mashaw (25.5.04), that such contracts may either go to a firm with a close institutional background to that of the government department concerned, or, conversely, be deliberately managed so as to attempt to provide a sustainable pool of bidders.

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<sup>5</sup> Rhodes notes (1997:51) that by the second half of the 1990s there were official calls for different departments of government to work together, especially on policy delivery ‘across Institutional boundaries’ suggesting that DEFRA and the DTI were in the vanguard of joint-working.

The Programme was expected to operate much as previous government research programmes had done, providing industry with information on new developments by producing authoritative reports and by involvement with professional and trade associations. The contract required more money be spent on consultants (who carried out the research with industry and wrote the Good Practice Guides which were its hallmark) than on in-house facilitation. It created around 80 documents a year, of which around 25 were Good Practice Guides. Programme staff had to identify suitable topics for such case studies, get them approved and manage their production, ensuring the language used was not too technical. Knowledgeable advisers were also engaged to answer technical queries and make site visits to companies. Various schemes provided cheap or free advice to firms. There was no provision for direct funding of waste minimisation clubs (only one part of the Programme), for it was not seen as appropriate to provide such a subsidy to firms - the task was to provide lacking information and encouragement. A very small number of firms were paid small sums for information and assistance in drawing up case studies for publication regarding work on clubs.

#### Engagement with intermediaries at the local level

The working arrangements for ETBPP were thus that a relatively few staff were faced with producing numerous technical documents and with the hard task of getting industry to listen to what they had to say. Faced with this problem, with an underlying expectation that supplying clear information of a high standard was a sensible way to bring about change, they turned increasingly to engagement with organizations which already liaised with business as a route to influencing firms. The technology transfer programme began to link to a new audience - the intermediary organizations such as business liaison staff from local authorities, greening of business consultancies, local Business Links and the Environment Agency, all of which had their own reasons to engage the business community with environmental issues. Thus the team, in a classic way, pragmatically shifted the targeting of their message to a new audience which might become their allies in the task of persuasion, using the organizational form of partnership projects focused on waste minimisation clubs, in preference to more traditional contacts, such as trade associations and chambers of commerce. The attention given to these intermediary groups was later heartily encouraged by the Departments concerned (interview with Douglas Robertson of DTI 7.6.02). By May 1998 the Programme was launching guides to stimulate interest in clubs by such intermediaries (for example, "*Waste Minimisation Clubs: Setting Them up for Success*", (GG122) and *Cutting Costs by Reducing Waste: Running a Workshop to Stimulate Action*", (GG106). The new tactic paid dividends: in 1996 the Programme had predicted possibly 22 such clubs; by mid-1999, the ETBPP could claim around 60 (interview with Mike Walker, 23.4.99).

Once begun, this approach of attempting to convince intermediaries to run clubs, alongside the established practices of addressing firms and targeted fields directly, proved to be very successful indeed. Programme staff enthusiastically liaised, persuaded, provided expert advice and, the evidence from case studies shows, also helped to boost morale when the occasion called. The clubs came to be perceived as a significant part of overall results: in the November 2000 issue of

“*Update*”, Martin Gibson, by then its head, could claim the Programme had helped save British companies over £100 million, another article in the same issue reported that club membership had resulted in more than 1100 companies saving over £45 million per annum (at pages 1 and 3).

The ETBPP/Envirowise provision of publications and events both facilitated work on the clubs by other intermediaries and produced a consistent and standardised way for them to approach the issue of waste minimisation, and to use language about it. This ‘Account’ stressed the market advantages of such changes, thus imbuing the new proffered norms with attributes perceived as giving them legitimacy for targeted groups. Envirowise went further, running workshops both to draw in further intermediaries and to explain how to succeed in waste minimisation work, thus extending its influence and increasing its ties with these groups. Later they were to develop a “*Business Supporters’ Club*” open to ‘anyone who has a remit to help companies,’ such as environmental consultancies, Business Links, local offices of the Environment Agency, local authorities, government offices, utility companies, etc. It notified members of new developments in waste minimisation and offered help with setting up waste minimisation clubs, mail-outs, training, publications, marketing events and networking facilitation, even providing speakers for events, though not necessarily on specified topics.<sup>6</sup> This work can be seen as increasing the structuration of these relationships and calls to mind the processes DiMaggio (1983) described in the development of the art museums organizational field. In that case the introduction of government grants led to the provision of advice in the form of conferences and workshops, on the ways to claim successfully. The increased interactions between the intermediaries there assisted in their seeing themselves as constituting a recognised community with common aims, its own ways of operating as professionals, its own techniques and technical terms.

Yet the arrangements resulting from this concerted encouragement were not ideal for ETBPP/Envirowise. Because the newly enthused intermediaries engaging with clubs gained funding for this from a heterogeneous collection of grant-funders (in contrast to the state-funded art museum managers), the Programme had very little influence on what was done. It had no remit to demand information on what occurred in the clubs or even to require those running clubs to inform it of their existence or details. In the early years of the Programme there was no recommended system of oversight for checking on claims of savings on costs, effluents, etc. made either by firms or by intermediaries, and participant firms were frequently reluctant to do baseline audits, or to openly share findings. Envirowise could offer the inducement that good results would create good reputations with funding agencies, but little more.

“Actually getting the baseline data and getting people to measure is a huge issue. We have always had it but it’s becoming a bit more; it’s an enormous problem... (interview with Eleanor Morris of Envirowise 11.5.04)

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<sup>6</sup> [As time went on, Envirowise proceduralised its arrangements for employing intermediary consultancies directly for its main range of initiatives and set up a sub-department to manage and encourage involvement of intermediaries generally, later establishing regional representatives to assist in this task.]

Whilst systems were developed for companies to sign off successful results, and for the information to be checked by consultants, for use in Envirowise publications, the Programme had no regulatory powers over this process during the years of this study, and firms often reneged on previous commitments to allow publication. Yet there were strong drivers for intermediaries with defined targets to set up systems which provided argument, in the terms of Majone (1989:46-9), that those targets were being met.

#### The reception of the Programme and the second contract

The Programme, with its strong base in the government 'family' of outsourcing organizations, was, nevertheless, treated somewhat guardedly outside. Partly this was the wariness evident in the business culture, of any part of the government machine, which was not dispelled by their being a private organization. They were also critiqued in some quarters in terms of their engagement with intermediaries, which was seen as hampering. Leach (2000:329) who studied the waste minimisation clubs as an example of a type of policy instrument of 'persuasive communications' remarked that "ETBPP seems to be regarded as a useful source of impartial information to be used by intermediaries, but a poor mechanism for persuading companies directly to minimise waste." Several interviewees expressed concerns both about the value for money of the services provided by the Programme in its early days and the effectiveness of the links between the national programme and local activities. There was also criticism by some experts in the field, of the reliance on numerous technical publications drawn up (a term used was 'regurgitated') by outside consultants without, necessarily, adequate peer review.

The Programme was, however, endorsed in government circles both for its reported results and for engagement with intermediary groups. There was an evaluation of the Programme in 2000 and it was decided to renew the contract until 2007; such a long-term commitment was unusual at that time as ministers were reluctant to make long term financial commitments. This had boosted morale considerably in the Environment Section of DTI (interview with Douglas Robinson of the DTI, 7.6.02). Under the new contract all responsibility for the external face of the organization - the website, national events and national PR - was given to 'Technology Transfer and Innovation', a part of the National Physical Laboratory (NPL) which already carried out numerous projects for the DTI. The remainder of the work was given to Momenta, another wing of AEA Technology. Its specialised role was, despite its privatised classification, well in keeping with its ministerial lineage:

"Momenta only works with government clients, so we don't have any private clients at all. Our strap line is 'Policy into practice' so we work with government where there is a need to translate something from government strategy and actually make it happen on the ground." (interview with Eleanor Morris of Envirowise, 11.5.04)

Under the new contract, each year, AEA and NPL create an annual plan for the Programme, setting out proposed strategies, targets and target dates. Once this is approved the partners merely send monthly invoices to the sponsoring departments which make payments once satisfied that the

partners are meeting their own designated objectives. Whilst the departments retain the right occasionally to send in auditors, etc., AEA and NPL are thus given extensive self-regulatory roles, being required to carry out impact assessments of the Programme and to evaluate what occurs, using DTI guidelines on programme evaluation (information from interview with Bernie Walsh of DEFRA, 17.6.04). Douglas Robinson of DTI commented (7.6.02),

“The whole idea is for us actually to hand the management to AEA themselves, not to do it ourselves.”

As part of the mid-term review of the second contract, further administrative changes took place, including the reorganization of the management and oversight of the contract and the replacement of the Management Advisory Committee arrangements with a Stakeholder Group.

These patterns of relationships, some close, some imbued with slight distrust, alongside the processual dynamics resulting from increasing, and increasingly formalised, engagement with intermediaries at the local level, set the scene in which Programme, and club, activities were themselves regulated.

#### Regulatory aspects concerning the Programme and the clubs

The governance of the Programme, whilst it had shifted, still conformed very much to established patterns with which the departments concerned were comfortable. For some years they had stipulated carefully time-tabled impact assessments and mid-term reviews, generally done by major consultancies or universities listed by the DTI's evaluation department; for Envirowise, in fact, use was also made of an ex-DETR consultancy, now in a different department. It was explained that this team was

“hired to do these sort of management reviews where they are slightly better informed about certain government practices on overseeing programmes of this kind, so that they can give a better feel for what is best practice.” (interview with Bernie Walsh of DEFRA 17.6.04).

A singularly important form of governance for the Programme, was the stipulated metric that for every pound spent offering advice it must save the companies advised (“UK plc”), £10 in efficiency gains. That this was satisfied was demonstrated on the basis of reporting from the organizations advised (interview with Robert Lowson, 18.5.05). These modes of oversight were treated as very straightforward by the civil servants and members of the Programme interviewed. Envirowise did not appear to go beyond the strictly necessary in its own auditing of its effectiveness over the years of this study. There seemed a tendency to shy away from the possibility that the evidence might show that the Programme was having little effect. It was, of course, beneficial if the market research appeared positive.

This confident, if bland approach of not peering unnecessarily might have been reasonable as regards the Programme, run by people with an established track-record with government. It extended, however, to a lack of provision to take in the special oversight problems posed by the success of the clubs, which did not nestle in the departmental cultures in quite the same way, and where there was

not even a contractual commitment with a government agency. This, too, proved a difficult issue to probe. More than once, when senior people were asked questions about issues relating to the reliability of the claims made concerning the clubs, it was as if they hadn't heard, and their answers were answers to slightly different questions. For example, this exchange:

Q. "What system was there to ensure that the website information was accurate and regularly updated?"

A. "Well, we rather leave that to the Programmes (*sic*) to organise themselves and we measure that by how many hits they get over time. We obviously make use of it ourselves and people who use it around the department will clearly have views on it as well. The information that they put on there, will clearly be .. if it's best practice, then some of these best practices are independently audited<sup>7</sup> so the verification of some of that stuff is handled separately. The overall impacts of the Programme are verified by impact assessments. So the verification is a process we think is well catered for."

If members of the relevant departments had concerns that firms within clubs, or intermediaries collating information about clubs, might produce evidence which was not completely reliable, this was not acknowledged in the interviews carried out. The ministries were aware of great variability in the level of performance across the clubs. There could have been little or no criticism of ETBPP/Envirowise for not providing such audits, etc., when they were not given the necessary powers or funding to require them to be done. There seemed to be a general view that the clubs were beyond the remit of the departments' oversight machinery and that this was reasonable. There appeared to be reliance on three factors - the controls from the various grant providers, the 'discipline' introduced by making such claims public and the quality of the guidance produced by Envirowise (where the consultants and firms involved attested to the matters claimed).

There was another potential difficulty concerning regulation, but this time concerning Envirowise's own regulatory role. Envirowise' services included giving advice to firms which might be breaking the law. This might have been seen as an encroachment of the regulatory space and roles occupied by the formal regulator, the Environment Agency, which had a clear legislative remit to carry out surveillance and take formal prosecutions where necessary, and was paid by DEFRA specifically to do this. There was a consciousness by senior civil-servants that Programme staff were advising on compliance issues, in effect acting as a proxy for the teaching role of the regulator, yet in most interviews there were virtually no problems acknowledged regarding the potential ambivalence which might have been apparent had there been a more formal structure of designated roles, and it was emphasised that Envirowise worked closely with the Environment Agency at both national and regional levels, each promoting the other's work, and adopting complementary 'carrot' and 'stick' roles with business. Yet business logics were to the fore:

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<sup>7</sup> (The best practice case studies comprised a small proportion of the material on the website and so talking about them did not address the main import of the question.)

“...one of the key areas that we are conscious that the Programme can provide useful service is to help raise awareness of the obligations befalling businesses... It is not there only to explain legislation to them, because its role is basically to see what ways the business can minimise its waste and save costs. If in the course of giving that advice, local advisers hired by the Programme can see difficulties as regards legal compliance they will certainly draw that to the attention of the manager and say that a. they are running a risk and probably b. that they are wasting money. But that's all confidential to the management.” (interview with Bernie Walsh of DEFRA, 17.6.04)

Relations were kept cordial and very gentlemanly. As Eleanor Morris of Envirowise noted of practice with businesses:

“All Envirowise on-site advice is completely confidential to the business and any non-compliance issues are highlighted in the report given to the company. The EA, DTI and DEFRA do not have access to individual company's information and only see collective data.”

In the same mode there was often a tacit arrangement that Environment Agency staff would not enforce against firms engaged with the Programme:

“I can only answer that ... through my experience of running workshops where we have had Environment Agency people in the audience, say, it has always been overtly that they are there to help and that they are .. if they hear anything, then it is off the record .. and that's the only way that companies... on that basis companies have accepted their presence.” (Mike Walker interview 23.4.99)

The normative roles were a little more complicated than this suggests, however, because as noted earlier, Envirowise had a formal role in informing government about the activities of other organizations on waste reduction and advising them, so that it could be seen as acting not only in a quasi-regulatory fashion concerning such groups, but also as a legitimator - and this increasingly so, as it employed numbers of consultants directly to advise companies on waste minimisation.

The chapter now goes on to consider why certain organizations at the local level were so ready to engage with such initiatives (predicated as they were on a business logic) when they, in fact, were offered no payment by Envirowise for this.

### **The Business Link Advisers**

Whilst a great variety of business support organizations worked on waste minimisation clubs at local level, Business Links were chosen to explore because, as a nation-wide organization with a government basis, the organization can be assumed to reflect government policy on business support, so setting any differences in what occurred with clubs in relief; they also represented a common situation, where the Advisers working on the clubs were employed by a major organization, but where engagement with projects was crucial to their role.

During 1997-2001 the Business Links had very few staff working on environmental issues - in 1997, for example, there was only one in the whole of London. Five people of an estimated seven who worked on the clubs from the Business Link offices in East Anglia, London, or the East Midlands were interviewed for this research. As a group they were very skilled and knowledgeable about waste minimisation; as their job titles varied they are referred to here as 'Environmental Advisers'. (The East Midlands area included Northampton, which was exceptional in being the focus for some of the most successful clubs nationally; in fact the views from the Adviser there did not significantly shift the balance of information derived from other interviewees on the matters discussed here.) This Business Link group gave some of the shrewdest and most perceptive comments of any of the interviewees about the situations they faced.

The Business Link Environmental Advisers operated in a difficult context where new projects were continually set in train to draw in funds, within a culture stymied by repetitions of cost-cutting exercises. In some ways the evidence from the Business Links has similar aspects to that found in the regulatory body, but here it has been possible to interview nearly all of those involved and it can be presented rather more at the level of the individual agent. The next paragraphs briefly describe the remit of the organization, its institutional setting and the changing government strategies and local variability in conditions in which it operated. The importance of sources of grant funding to the local offices is explained, as is the influence this had on encouraging networking to ensure new partnerships could be formed or maintained. There is then a consideration of the lack of legitimization within the organization for the roles of the Environmental Advisers, and how this influenced activities and attitudes to the projects being run. Evidence is then set out about how the business advisers acted as intermediaries for Envirowise with the clubs and the skills in mediation and tact which they displayed. The final part of this section draws interim conclusions from this evidence.

#### The local context for business advice organizations

The Business Links were created to counter the "welter of advice and information of variable quality from a confusing maze of local agencies" in the business advice market. (Michael Heseltine, 1992, cited in *Institute of Directors*, 1996:3). They were established over 1993-1996 as partnerships between local, previously-existing providers of business advice such as Training and Enterprise Councils, Chambers of Commerce, Local Authorities, Enterprise Agencies and private sector organizations, and were intended to provide a single point of access for businesses to receive those core services stipulated by the DTI, focusing on advice and local initiatives. (Bryson and Daniels, 1998:275-7) The early form of operation was for a Personal Business Adviser to talk to firms, help them identify their priorities and refer them to (generally local) specialist advisers as appropriate. The original intention was that the offices would be financially self-sufficient within 3 years, but this was modified within a year to raising 25 per cent of income by their fifth year. (Financial Times, 8th April 1997, cited in Gavron et al., 1998:63).

This combination of changing stipulations from the centre meeting local variability continued. Their

original role as the standard delivery mechanism for all the DTI's business services from April 1996 was rapidly shifted to a focus on the provision of new services for firms of 10-200 employees, as these were believed to have most potential for substantial growth (*Institute of Directors*, 1996:4-6). By 1997 some offices had already modified this guideline yet again, and were assisting firms with as few as 5 employees. There were enormous numbers of initiatives: Gavron et al (1998:59) found<sup>8</sup> nearly 200 central government business support initiatives, sponsored by five departments and delivered locally in different ways through diverse organizations. This heterogeneity and lack of consistency at the local level is demonstrated, in terms of the greening of business, by the *Environmental Business Club Directory* (DTI, 1998). This lists 118 such organizations; whilst 60 are waste minimisation clubs (themselves variable) the rest are dubbed variously Business and Environment Clubs, Environmental Business Fora, Action Groups, Challenges, Trusts, Environment Centres, and Foundations. They are run by organizations as diverse as local authorities, TECs, charities, not for profit companies, professional bodies, trade associations, university departments and private businesses and consultancies. No isomorphism here!

#### The importance of grant funding and partnerships

Alongside the Business Links there was still a bewildering mêlée of organizations providing business advice; with some of them the Business Links competed for the same funds. Layered upon the confused strategy of allowing a market in business advice yet supplementing it at intervals with new organizations designed by government departments (see Vyakarnam and Adams 2000), were two important further constraints concerning funding. First, there were repeated calls for reductions in public expenditure on such services; this meant that the Business Link offices could not operate as serene single points of access to experts but were competitors with other service-providers, all anxious to draw in income and find client firms willing to deploy their services. Second, grants might provide needed supplementary funding. There was a great variety of sources of grant, which those seeking funds had to scrutinise. The requirements tended (given the general stress on saving or 'stretching' money), to preference novelty in bids, for there was a great belief that a new (subsidised) project might show the way to others who would then set a course for similar objectives without funding. They also preferred allocations spread across a range of organizations, so that more might be seen to benefit. Partnerships became seen as essential components for the success of many funding bids (Ross and Osborne 1999:51). The Business Links and other parties were pushed towards a pattern of work where projects for which grants could be found might provide relief from financial constraint. Yet their receipt was uneven across offices and regions, exacerbating the already variable provision of services offered to firms. Success depended on a certain entrepreneurial flair in recognising the potential benefits from a grant-giver, skill, and often speed in preparing and submitting the bids [which not infrequently entailed negotiation and partnership arrangements between a number of organizations (Gavron et al., 1998:25 and 65) and so maintenance of good relations with potential project partners over a significant period]. A good 'track record' of complying with the requirements of past grant-givers was significant in obtaining

<sup>8</sup> from figures supplied in conversation with staff at the Cabinet Office

the next. Receipt of a major grant, such as from the European Single Regeneration Budget could imply continued co-working, typically over a three-year period for several parties. Thus the local Business Link offices were both creatures of partnerships and depended on yet more partnerships for significant sources of funding and legitimation.

For many intermediaries grant projects followed one another in a stream. Partnership projects often revolved around providing benefits for specified types of businesses, and businesses which had benefited from one grant might become known to local organisers and so be involved in more than one project<sup>9</sup>. It was often necessary to rename initiatives, either because some funders would only give to novel projects or because, as political administrations changed, so did requirements and terminology, so endeavours would be 'rechristened' and refashioned to suit. Roy McKinney, who worked on the Lincoln Food Sector Club for some years, described how his Business Link team<sup>10</sup> had been working with essentially the same group of firms since October 1993, carrying out projects such as water recycling. Then in about 1995, he recalled,

"They took 'Productivity' and said, 'These are Environmental Projects'."

Thus there was regrouping and recategorisation of what was already occurring.

For these shifting and changing initiatives, oversight was variable; often there was no mechanism (for funds and time were generally insufficient) to ensure that information on outcomes came from disinterested observers. Many individual organizations operated their own systems of management and commonly grant-givers would have their own systems to ratify that monies had been spent as promised. Gavron et al, speaking of business advice initiatives generally, noted in their executive summary that there was no coherent evaluation of the effectiveness of programmes (1998:vi). They reported (1998:26) a "dearth of rigorous longitudinal studies of the effectiveness of government schemes on growth and survival" which rendered policy analysis "extremely difficult." Nor did they find formal mechanisms to disseminate information about initiatives, so that if one was very successful or unsuccessful "no other TECs, Business Links or other interested public or private sector agencies would know, except by accident." Significantly, however, they reported that numbers of informal networks had emerged and that "the co-ordinators of some of the more innovative and successful initiatives are more than willing to promote their schemes to interested parties."

### The peripheral role of the Environmental Advisers

Within the Business Link offices, the core activities were advising on major local industries (for example in East Anglia, on the Food and Drink sector) or on key, generic business skills such as

<sup>9</sup> I am grateful to Andy Friedman of the University of Bristol, who confirmed a remark made in a presentation about his work (Friedman and Miles, 2002) that the firms involved in the initiatives he studied 'tended to be companies that were already doing something'. There were instances here, in contacting firms about initiatives, when the person sometimes did not at first understand which initiative was being spoken of, and recalled the club only in a mix of others. That the efforts and grants may be being used to assist the same companies several times is an interesting aspect of voluntary initiatives, beyond the scope of this thesis, which may repay further investigation. (telephone conversation 24.5.04).

<sup>10</sup> (He had been a local business adviser prior to the creation of Business Link.)

marketing, design or innovation. The expansion of the waste minimisation clubs came at a time when the greening of business was not one of the stated aims of Business Link nationally. This had considerable ramifications, for pollution prevention advice was seen as peripheral and not as legitimate an area of work as the major specialisms. A very significant framing issue, reported by interviewees, was that new approaches which improved environmental performance were not defined as innovation; they thus at an (unthinking?) stroke lost all the benefits of identification with a vital core activity of the organization. (Northampton was an exception and this may have been one reason for the stronger support for greening issues in that office.)

Most interviewees reported their specialist knowledge of pollution prevention, etc., as being considered peripheral or even inappropriate to the main activities of the organization, although a couple had been appointed by far-sighted senior managers prepared to buck such trends. In the main, however, the message was the converse of that found in the Environment Agency: there was no funding for 'greening' issues in an organization focused on business. Given the importance of funding in the Business Link culture, however, an awareness that there were grants available led to pragmatic shifts. Interviewees recalled how some Business Links would gain grants for projects which had an environmental element and to fulfil that part of the work, either take on staff - sometimes on a freelance basis - or engage specialists such as universities or Groundwork Trusts. Some of the interviewees owed their posts to such manoeuvres. Their terms of work were invariably that outside funding must be brought in to fund any work done on environmental issues, so staff working on innovative 'greening' projects had to secure funding with the knowledge that if they were not successful there was the very real possibility that their contracts would be at an end.

"Frankly they were so bottom-line oriented that as soon as there were perceived difficulties in funding, there was little residual support. It's the old question of having to deliver against a project at the same time as having to prospect for other areas of work, and clearly that was difficult." (interview with Myles Greenhalgh, 23.6.04)

The skill and knowledge of the freelance Environmental Advisers was appreciated by ETBPP/Envirowise, especially in its first years, when it made good use of them as further intermediaries in the chain from their national, centralised organisation to firms at local level. Yet there was evidence suggesting that even civil servants pushing forward the pollution prevention agenda displayed ambivalence over the necessity for Environmental Advisers in Business Links, preferring that ETBPP should carry out their role.

The views of the Business Link Environmental Advisers clearly straddled the line between a focus on small businesses - the declared core remit of Business Link - and commitment to greening. The evidence from the interviews reveals them all as very committed to furthering the cause of, and assisting, their small businesses clients (echoing the findings of Lean, Down and Sadler-Smith 1999). It was as if they had taken on this aspect of the organization's culture very deeply and during the interviews some spontaneously raised problems for small businesses such as their time constraints

or lack of capital and how the club projects had not made allowance for these, although there were not questions put about these problems. Alongside this, in interview most Advisers identified themselves as operating from a strong environmental ethic, acknowledging by their slightly bashful or jokey style that this was hardly the 'done thing' to acknowledge.

### The need for networking and its inefficiency

For the Environmental Advisers, the need to succeed in bids for grant, and to make contacts both with the business community and with potential partners for these grant bids, made networking crucial, yet it was demanding in terms of time and effort, for each might work on several initiatives and bids at a time. Myles Greenhalgh recalled:

"One had a series of parallel streams; one was in the Green Business Club, one was in the Bedfordshire Energy Management Club, the Bedfordshire Responsible Care Cell. I was in a whole series of parallel type organisations."

Efficient participation in key networks was a prerequisite for achieving change on the ground via such initiatives. Some Advisers were very skilful at this and contrasted their approaches with the paucity of contacts of some university consultancies. Both types of intermediary were, in effect, adopting, in this world of projects, a work pattern described by Powell (2001:19) as "gigging" - the style of work of freelance musicians moving from engagement to engagement, often in different bands. The constant rejigging of partnerships with 'suitable' partners had, for some Advisers, a frantic quality, taking up time which might have been spent on existing initiatives. Others enjoyed the cosiness of some of the longer term club partnerships, the "nice meeting every quarter, and nice cup of tea, and seeing everything was going to plan" (Environmental Adviser, 15.11.99).

The need of these intermediaries to engage with potential partners and participants in future projects explained, in part, a quirk in the original empirical results from the case studies (which in fact led to the investigation of the benefits of the clubs to intermediaries). Both case studies used a standard interview schedule for all interviewees. A question on networking was included, which it was anticipated would reveal the extent of the benefits for participating firms in that respect. Surprisingly, the participant firms reported no, or fairly negligible improvements, and few opportunities to meet and talk other than at training sessions. (Some interviewees complained that the projects should not be called 'clubs'). In contrast, for the intermediaries, contacts formed were not only useful in organizing further projects and gaining future funding but could counter their isolation, providing needed technical information, or assist their gaining better posts with other organizations. Some Business Link Advisers were jubilant at the way the Clubs helped them to make useful contacts: For example, one adviser<sup>11</sup> responded when asked whether there had been improved networking:

"As a result of the club? Actually, with all of them! I didn't know much about the Women's Environmental Network and they refer people to me now; I didn't know much

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<sup>11</sup> Note it has been impossible to contact those quoted in the examples on this page to send them these quotations for verification.

about London Environment Centre but I am working on several projects with them now; I had never met the contact from Focus [a TEC important for her core funding] but I have now; I have got to meet the recycling and waste officers from the three different councils ... which is really good; I have met most of the March consultants, she (sic) has come to my networking events..."

Question - So you are networking well beyond the remit of the club now, with these other people?

Answer - "Oh, absolutely..."

As there was no overall co-ordination of projects, there could be duplication and competition for participant companies and consultancy work. Yet it would have been unwise to have expressed contention overtly: Business Links, based as they were around partnerships, were dependent on cooperative working relations with others for significant sources of funding and legitimization. The extent of their exasperation at aspects of the competition is shown in these remarks from an Environmental Adviser, recorded just after the main interview ended, (and with names anonymised):

"the other thing that has been concerning me a fair bit .. not just in relation to (the club) but in relation to the ones in A, B, and the C project... is there is so much duplication..... I am watching the C project coming through... they are getting and collecting funds for something we offer anyway.... and not only that... X [ the consultant running the project] has drawn business out of local consultancies and Business Links and is bringing in the Environmental Helpline to come and do the visits... and has got a bit of clout with them .... it concerns me when I see projects duplicating and duplicating .. like G are doing training in exactly the same area... and so are the D. And E are trying to do it... and we are plugging away here too... there's going to have to be some kind of coordinated approach to the way environmental funds are given out .. simply because it is not doing anyone any favours."

This pattern of uncertain funding streams and jumbled service provision sometimes public, sometimes private had created a situation where service providers chased both grant monies and, in some areas, client firms willing to deploy their services.

Despite the efforts made to create and sustain them, these networks were cumbersome and also short-lived and fragile. They might disappear or become much less effective once key people moved jobs (not a rare occurrence) or key support organizations were closed or funding ended. They thus represented very great transaction costs to those engaged in promoting voluntary greening of business. It is notable that whilst many of the problems associated with the running of the Clubs were not rectified by the end of 2001 - among them the need to have consistent and secure forms of auditing - there were several *ad hoc* solutions to the problems presented by networking, reflecting its importance to the intermediaries. Several interviewees had been involved in setting up umbrella networks, such as the Lincoln Energy and Environment Group, and The East Midlands Regional Waste Minimisation Business Network, or knew of the appointment of network

co-ordinators. The Bedfordshire and Luton Sustainable Development Partnership was particularly innovative in that it acted to provide a common oversight committee for each of the separate environmental projects running in its area, thus reducing the need for meetings, and, once in existence, became influential first in guiding the kinds of projects pursued, and then in making bids on its own behalf for wider projects, such as the influential "Envirolink" initiative. They were thus active in 'dealmaking' in the terms of Suchman (2000), however the field of activity actually strengthened by this was that of projects involving intermediaries, rather than the giving of advice on greening for which private businesses would pay.

#### The 'translation' skills of the Business Link Environmental Advisers

Notwithstanding the ambivalent attitudes shown about the appropriateness of their role and stance, the Advisers clearly acted as intermediaries in the terms of Cudahy - speaking at and running conferences and seminars, and producing material in a variety of media about the initiatives and the possibilities they offered. For example, Dr. Paul Barker, then a freelance with a part-time contract at the Business Link office in Lincoln, ran a highly-praised club, was the author of some ETBPP *Best Practice Guides* on Waste Minimisation for Business Advisers, acted as technical consultant on a CD Rom called *WasteWise*, toured the UK to advise on the setting up of Green Business Clubs and appeared at conferences and on a video for Envirowise. The evidence suggests that, true to the mission of Business Link, the key messages the Advisers gave about the clubs were in terms of saving money. They also introduced, less prominently, ideas that it was important to minimise the pollution produced, whether voluntarily or in compliance with legislation and encouraged businesses to approach the material resources that they used in a new, conservative way, raising their awareness of the harms that might be caused from less careful use. Thus they were, despite their less than clear position, engaged in showing those in target organizational fields how they might operate in a new fashion and coupled this with demonstrating how the new modes of operation were consistent with the requirements of formal legislation and the various burgeoning self-regulatory environmental management systems that were coming on stream.

There is no evidence from these interviews suggesting that the Environmental Advisers could be considered as acting as entrepreneurs. They were people who were employed, albeit at a distance from their employing organization, and the language they used and statements they made at interview concurred with those heard as a participant observer: they were faithful both to the practices, norms and expectations of the project world as well as to the values of Business Link and at the same time committed to encouraging practices associated with greening. To do so demanded great skill - intermediation and translation was primary for their functioning - their 'bricolage' was in linking and ensuring understanding between three fairly inconsistent approaches to assessing value. They had neither significant social power, nor legitimacy within their own organization, and were concerned with ensuring continued resources: this skilled display of the potential compatibility of the discourses was consistent with people who could not risk open contention or radical argument. They were faced with modes of operation which required that they 'translate'

and 'edit', making coherent sets of norms from different fields to deal with local problems (Czarniawska and Joerges, 1996; Sahlin-Andersson, 1996:70-1)<sup>12</sup>. Three aspects of this mediation are presented: first, how they acted to make the projects valuable and advantageous for Business Link; second how they 'translated' relationships with regulators (rather than compliance with regulation) as key to successful pursuit of project participants' aims, and third how they presented the clubs and their methods as of value to firms, repeating the state-encouraged view.

As implied above, involvement in successful initiatives such as the waste minimisation clubs could potentially be beneficial for Business Link offices, for most clubs had broad aims consonant with those of numerous organizations with which the Business Link regularly liaised - for example utility companies, local universities, and the economic development and Agenda 21 priorities of local authorities. If quantified results were made available, they could be quoted, and were then useful both as a symbol of success for their target market of local businesses, and, as emblematic of the Business Link concern with productivity, assisted the advisers in presenting themselves as legitimate members of the organization .

The Environmental Advisers were aware of the difficulties of providing the kinds of evidence necessary to achieve greater legitimisation within Business Link; there was a general recognition that auditing of results was difficult and delicate, especially where participant firms refused to release data about any savings they had made. One referred to the problem as "a nonsense for a Best Practice Initiative." One Environmental Adviser recalled that ETBPP/Envirowise had audited results in some detail for one year, but had ceased to do so; however, this is the only reference to this..

"After that, that was the weakness of it, because the results weren't certainly recorded, you see. The companies held on to a lot of information; they'd tell us anecdotally how much they were saving but it was difficult to get them to put it into writing." (Paul Barker, 23.6.04)

The issue, which might threaten the legitimacy of other work, was handled variously. Some made use of the expertise of university staff which they felt was unchallengeable:

"Cranfield is not inexperienced in producing parameters and yardsticks and they created a set of yardsticks that we agreed with and those yardsticks were not massaged - that means you fiddle the figures - what they did do is they looked at the generality of results and said well, OK, if this is a vehicle to persuade businesses that waste minimisation is a good idea, then these are the outputs that will most interest them... and so consequently that's the way they approached it." (Myles Greenhalgh, 22.6.04)

In other words, the whole issue of the validation of the claims had been solved by passing the matter to the respected local university experts to solve. Derek Pedley from Northampton, in concurring with the difficulties of collecting good numerical evidence, pointed to an alternative way in which

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<sup>12</sup> This can also be seen as a circumstance where several institutional logics coexist, providing a range of different ways of understanding behaviour, which they were able to utilise in translating to different groups (Kjaer and Pedersen, 2001:244)

academics were able to provide services and so legitimisation:

“No, it wasn’t straightforward. Collecting information like this from companies is not as easy as you’d think. But we did have good relationships because one of the things we tried to do was, for instance we were doing, not only doing audits but through the college, helping to train the employees as well.” (24.6.04)

The Business Link Environmental Advisers deployed a variety of approaches towards regulation in their promotion of voluntary pollution prevention by firms. They already, themselves, carried out advisory inspections of firms and there was an almost breathtaking recognition by some of the widespread non-compliance to be found across industry. The most striking inducement used to get firms to engage with clubs was their potential need to avoid regulatory action.

“I wouldn’t say strong arm people, but tell them that the [Environment] Agency would look more favourably on companies that actively participated in a waste minimisation programme...” (Paul Barker, interviewed 23.6.04)

Their awareness of long-standing and widespread illegal practices included practical knowledge of circumstances which meant that that few small firms actually paid for their waste disposal<sup>13</sup>. (And of course such states of affairs would certainly render null and void all arguments for benefits from changing behaviour based on savings of these costs.) Waste costs might be low or non-existent because of specific features in certain sectors, because of the prevailing price structures or practices, or because of bricolage (such as discreet dealmaking). For small businesses,

“Costs for wastes are so low, you have got nothing to offer them. In London costs are higher and waste costs are a low part of that figure, and often they don’t pay for it or do a deal with the next door neighbour to use their skip... The average company in London works at such a rate, it’s so frenetic, and there are so many service sectors, and many are in service accommodation where they don’t pay for their wastes, so their waste costs are very low.” (Emma Burlow, interview 9.6.04)

With this understanding of practices, regulation is not advice or guidance, but firefighting and the notion of ‘going beyond compliance’ becomes, if not meaningless, certainly bizarre. In a third, and somewhat canny approach to encourage participation, Advisers would present the club initiatives as linked to an expectation that informal contacts with regulators would reveal an ‘inside track’. Paul Barker explained:

“We used to say here’s an opportunity for you to access people like the Environment Agency... without falling foul of them... getting them to be able to cosy up to them, getting to be able to pick their brains and get the inside information without them formally coming round and investigating you, you see, which is what companies didn’t want.”

These intermediaries, whilst carrying out inspections themselves, recognised the formal environmental regulatory rules as foreign to the governance systems within very many firms, and their tactics could vary from inducing fear of sudden imposition to ascribing benefits to friendly

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<sup>13</sup> Several intermediaries besides Business Link staff acknowledged this to be the case; their observations echo those of Viscusi and Zeckhauser (1999:438) on low levels of compliance with OSHA regulations.

association. Yet despite their realisation that few firms paid waste costs, the predominant messages from Advisers about the clubs remained claims, in line with the Account from Envirowise, emphasising ease of success and expected cost savings. Their mode of funding (which meant they must continually focus on obtaining the next grant) and their considerable sympathy for the plight of SME companies (part of the ethos of the organization) may have encouraged forbearance regarding potential difficulties and a reiteration of encouraging messages rather than exploring areas of doubt or lack of effectiveness. Messages about the importance of changes that would reduce pollution (which their answers at interview revealed them to hold dear) were sub-voices relative to claims about financial advantages.

Quantification of savings from waste was useful both as a symbol of success and as a reflection of concern with productivity - a core focus for Business Link. Their additional use of new categorisations foreign to the target fields, (as regards the link to waste auditing and environmental benefits), was not, however, the branching out into unforeseen ways shown in the literature on institutional entrepreneurship. It was rather a skilful adaptation of material, a mode of speaking to established expectations, which was carried out with an acute awareness of nuances:

“You have to find out what button it is to press. you have to keep your ears open and find out what it is that they are afraid of, really. It might be that they have costs, it might be that they have a specific nasty material that they are looking to get rid of... it may be that they are being pressurised from the Environment Agency...” (Paul Barker interview 23.6.04)

The Advisers were thus engaged in a complex process of translation and interplay, wending between conflicting norms and expectations while their own position was insecure, and not only as regards their parent body. This was not direct, top-down implementation of a government policy, nor was there a defined government policy to achieve change. Whilst Envirowise, as a formal agent of government departments, had encouraged involvement by intermediaries such as Business Links (as a measure which reflected its own initial paucity of resources) and they were recognised by the departments concerned as playing a worthwhile role, in practice these intermediaries did not receive the necessary resources (including security and certainty of role) to attack the problem with vigour. (Hearsay evidence gathered suggests that the departments' own expenditure commitments meant that, having created a niche role for Envirowise as providing expertise, they did not want to commit further funds to support expert environmental advisers within Business Links.) Even though the Advisers created new ways of viewing the problem of concern, and provided practical assistance to firms in dealing with it, the tenuous and temporary nature of the funding provision meant that they were not influential in changing practices in targeted organizational fields. They were seen as peripheral by their own parent organization and were restricted to only acting within the project form, and even this generally depended on having a (sometimes evanescent) partnership first. It is not surprising that their priorities lay in establishing and maintaining these mechanisms to run projects rather than in questioning the quality of some of the service provision.

## Intermediaries from universities and colleges

The final part of this chapter takes a different approach. Rather than listing characteristics found in university involvements with the clubs, explaining in each case the variability recorded, it sets out brief portraits of three academics, who, in their settings, provided the most marked examples of certain modes of engaging with the clubs. It is hoped that by reading about them as vivid examples - and institutional theory often neglects the level of the human actor in the institutional setting - the reader will retain a stronger idea of the particular range of tendencies and facets found. It is argued that to set out fine detail, *compressed* into categories of variables, about what were, in some instances, mere suggestions of patterns of behaviour, would not only be relatively unclear but might misrepresent. By showing 'strong' cases, using as far as possible the person's own words and expressions, and acknowledging that other cases fell between them, a more honest picture may be given of how individuals acted in response to the constraints and opportunities provided by their institutional settings.

It was not possible to state precisely which universities had had involvement in the clubs in the three regions; partly this was because of the lack of centralised record-keeping and also because involvement often stemmed from particular interests of individual academics, and when they left an institution no-one else remembered, or remembered where they had gone. Material was gathered about 9 universities which had engaged with the clubs in the three regions stated. Of these, it was possible to do formal interviews with 6 academics, and to have a meeting with one other; a postgraduate student who worked on the clubs was also interviewed about her experiences. The findings varied in distinct ways, dependent on the ways that the academics concerned were able to 'use' (or not) the institutional context provided by their universities in ways which produced matters which they deemed personally to have been worthwhile. They are characterised as 'relative freedom to operate', 'entrepreneurial' and 'consciousness of second-best by green idealists'. All three interviews featured here were by telephone.

### 'Relative freedom to operate'

Geoff Nelder of Cranfield is the subject of the first profile. Of the group of nine, there were two technological universities of considerable standing which had for many years done outreach work with firms. Geoff Nelder was very experienced in this, and was the Chief Executive of the Manufacturing Advisory Service for the East of England. Whilst his primary funding was for his work on technology transfer of environmental technologies, he was in receipt of several funding allocations from a variety of sources. This healthy portfolio meant that his time was fully funded, giving him some freedom to pursue other projects, provided they were consistent with his general remit of environmental technology transfer and he delivered on his contracted portfolio.

His team had been seeking a new approach to companies on matters such as waste reduction, and their involvement with the Bedivel club,

" fitted an area where the university has an interest, particularly on the technology level

but it also fitted the university's desire to be seen to be co-operating with local authorities and local communities in areas where particular skills can be seen to make a difference, so it was very much seen as a public good that we did this."

Involvement in the club had linked to his own personal consciousness of environmental issues, and, as with the rest of his work, involved networking as a process for spreading best practice with the added benefit that here he was learning from people with very different areas of expertise:

"There was a huge amount of learning from the networking that went on."

They had followed the usual 'Account' in communicating with firms:

"The line was always the same; the first argument was, 'This is going to save you money'; the second argument was 'And by the way it will have beneficial environmental impacts and therefore you can feel some satisfaction in being a good corporate citizen.' "

His experience showed that firms

"underestimate the motivation gained for the business in involving staff in these kinds of questions... people do, given the opportunity, people do prefer to choose an environmentally friendly approach to their work and I think that does come as a surprise to many of the managers out there, that their staff will actually consider turning off light bulbs if it's approached in the right way."

As partnerships were necessary for many grant bids, establishing and maintaining networking was a problem to many intermediaries. In Bedfordshire, he related, there was a set of people committed to networking on projects, each of whom had 'sold' this way of working to their employers as an efficiency gain; it had been recognised,

"... we would do much better to create an umbrella organization that represented all of us that could then be *de facto* the steering group for any individual project within that portfolio, so it was really very much to streamline the management of these projects and the way in which these projects referred to other organizations."

As rather more organised 'collective entrepreneurs' than was recognised by Wang and Swanson (2003), they had established an innovative umbrella network, the Bedfordshire and Luton Sustainable Business Partnership, which included the local councils, and which, by "trying to make sure there was real synergy and concerted benefits" acted as a facilitator and vetting system for many project ideas.

"Without the support ... from different organizations, it would have been more difficult to conceive and run the follow-on projects, simply because the changes in personnel would leave you short of key expertise but [by] networking we generally managed to find someone with the key expertise to step forward... [T]here have been a number of comments on how mature these networks are in Bedford compared to other parts of the UK and I think again this is a reflection of the effort and also the personalities we have got."

(The common facilitative approach observed in the partnership concurs to some extent with the

comments of Sydow and Staber (2002:218-9) that as project networks endure they may develop common rules, practices and norms.)

This then is a brief qualitative portrait of a person who used available working systems well, confidently running a portfolio of projects and contributing to networking systems in a way that enabled him 'to do worthwhile things'. The help provided to firms had been expert assistance with technological systems, linking to the university's established custom to provide outreach. The involvement had concurred with both university and personal priorities. There had been benefits to the department concerned by learning from environmental experts deployed on the projects, and effectively implemented innovation in the streamlined system for networking to facilitate future projects. The second portrait is of a very different academic in very different circumstances.

### **'Entrepreneurship'**

At the time of the interview, (9.6.04), Prof. Paul S. Phillips, Professor of Environmental and Waste Management at University College Northampton, had been directly involved with running 9 waste minimisation clubs in the UK, and worldwide had assisted or given advice on over 22, involving some 500 companies. He was not the only academic interviewed displaying entrepreneurial qualities, but was by far the most successful and thoroughgoing in this, full of Welsh charm, easiness, quickness and warmth.

From an early career researching into radon gas and its connection to lung cancer, he had branched into environmental subjects and had begun to develop a waste management degree at the University College in the mid-1990s. He had been intrigued by the reports of the few clubs that had run. Even at this time, "we were then, intrinsically, up and at 'em types..." Both his setting and his institution had supported this. There had been an active local Agenda 21 body in Northamptonshire, with a wide range of subgroups, giving him ample opportunity to network with businesses and discover their needs. The whole stance of the university college supported both entrepreneurialism, environmentalism (its mission statement included promoting prudent use of natural resources) and local economic development. This created, in contrast to the situation with the Business Links, a situation where engagement with initiatives such as clubs was consonant with the whole ethos of the institution. He explained how the institutional situation had fostered his links with local businesses:

"It has been recognised that universities are central to things like local and regional sustainable development... the university took that very seriously: they encouraged engagement, working with the local and regional communities and economies. The [benefits] are many and varied because I have a number of very big publishing groups where we would publish academic papers on something, so the spin-offs of this are huge, not just money coming into a project, but the PR was tremendous .. the academic spin-off of publishing in big national journals was wonderful, so in one sense it was a total win win .. in every way."

Its facilitative stance was partly because of the College's own position in terms of resources. Paul Phillips gave a clear, if not blunt, characterisation of the situation as he saw it and his response to the challenge, (in which it can be seen that he stepped out from expectations of academic separateness, and took a dynamic approach in response to the challenge):

"Oxford or Cambridge or Imperial, they have money coming in, hand over fist, just by asking for it. The other end of the agenda is the old lag in a bottom rung university who just wants to serve his time out... Now that's one end of the spectrum and the other end of the spectrum, now I don't fit into the old lag one because I firmly believe that if you are a university employee you follow a mission statement, it means that funding is important, so that we have performance indicators which we seek to achieve... once you have achieved something you go on to something else .. to keep the momentum."

Networking had been vital to his success: "If I couldn't have networked like I did, we would never have had the clubs; it was my networking beforehand that was the key thing, because I network extensively." He described his technique:

"[The clubs] were an open transparent book, on the importance of forming network partnerships before you need them. Because we had lots of partners, we glad-handed everybody, we'd give cards out, slap bang, we had a lot of networks existing, based on mutual interest, friendships, blah blah blah, OK, but where we had them, they would tick over, ... when you suddenly had ... new opportunities you could bring them back to life .. to deliver..."

"It showed that entrepreneurs aren't magicians .. the true nature of the entrepreneur is... you develop the pathways before you have a project to go down them, so when the time comes, you have everything in place, to do bids."

He also explained some of the reasons he was successful at recruiting companies:

"You actually tap the invisible networks of the companies first. We never just call cold. We find out in advance the networks in existence; it's often difficult. It could be golf clubs, masons, football clubs and we would devise the message that fitted that local agenda... We were very subtle, skilled people in terms of salesmanship; ... the message we gave them was based on a local message. In the end I would go up to discuss this. Because they like a slick professor turning up. Very important."

His staggering readiness to engage was shown by his immediate offer, when we had finished the interview, and without having read anything I had written, to act as my external examiner.

This was not, however, slapdash entrepreneurship without research. His approach had been chosen carefully, and he criticised what he saw as a mistaken, more business-oriented model by another, similar university. In this he followed a pattern shown in all but one of the interviews with academics, (and surprising in some cases considering the work priorities they were required to fulfil), a certainty that the real focus was teaching and a professional commitment to it:

"what we have chosen is a model which is based upon the provision for undergraduates

and postgraduates and the production of a large number of academic research papers ... therefore when we have gone for projects ... we have chosen the teaching research project. If there are projects to go for and we feel that there's a rational chance of getting them, then we go for them .. if we don't feel there's a rational chance, then we don't."

The team he had established had always run the projects themselves; he attributed the failure of a number of clubs to the fact that outside consultants had been employed.

Similarly, he had extensively studied funding possibilities and their requirements, reviewing the reports of the research assessment exercises carried out by the Higher Education Funding Council for England, and the opportunities offered by the Landfill Tax. He remarked, rather as a market leader surveying the scene, on how, as they became aware of this money other universities had become interested in waste issues, making increasingly large bids for funds regarding waste, and then, as funding from it dried up, most had withdrawn from the subject. Ahead of the pack, his team had already turned to considering new funders. He had realised early the advantages that the funding system gave to those who were considered to be at the forefront of an activity, and they had specialised. The team were extraordinarily successful in establishing themselves as a centre of excellence in waste management; the French waste management company, SITA, had paid for a new research centre at the College, prompting his ebullient comment:

"We got £350,000 in 1997 and you don't get that by having nice hair."

This offhand and funny aside, revealed an edge, an acknowledgement of weighted competition, found in several remarks from academics from less financially secure universities. There was a strong impression that they perceived themselves as being treated unfairly in the allocation of funds, or as more lowly because they specialised in matters relating to waste, with the expression of a corresponding joy when minor universities beat 'the system'. Prof. Phillips repeated a narrative I also heard elsewhere, with some glee. (It is reported here as a narrative reflecting attitudes held, and not as necessarily correct.) The story was that a 'major league' university in East Anglia, 'X', had turned down £350,000 in Capital Challenge Money; as a last resort the Government Office had approached Prof. Ann Smith of the University of Hertfordshire, and she had not only gained the money but run a very successful club, learning, from scratch, how to do future waste minimisation projects in the process. The punch line was "It was only after that that 'X' woke up to the fact that there may be money in waste management."

Alongside this relish at victories over perceived snobbery, was a very philosophic and resigned view about the transience of funding:

"We have raided lots of funds. The problem with funding is that people, after a number of years think you have exhausted the topic .. they say, 'Oh, the clubs are a bit dated now', and we say, 'Hang on, we have just about started, we are just beginning to catalyse and accelerate this'... they don't say, 'If it's working, let's continue', they say 'We have got to find something new'... there's a great knowledge gap at the centre of what's happening with funding."

As with classic stories of entrepreneurship, Prof. Phillips had been prepared to ignore the adverse values being placed on what he did:

“A number of people thought we were completely mad and beside ourselves and could not understand what on earth we were doing ... but it then showed people - we have become world famous for our waste min. clubs, but the momentum, the structure of diversion, looking for partnerships, ... was already in place several years before the clubs.”

Paul Phillips had huge energy for and pride in the waste minimisation clubs with which he had been associated, and what his team had demonstrated was achievable with them.

“When we galvanised groups of companies to reduce costs dramatically, we did see new thinking ... but more importantly, it was giving those people an awareness of what it means to be proactive. And it tied in with what we mean by workforce care. I felt that the majority of people we helped were really happy; they had some sort of positive new learning development ... for the companies.”

Having been successful with the clubs, he was prepared to move on:

“If you look at the form of the waste min. club, its rather like they have a certain variety of shelf, of ‘product life’. The argument is that a waste min. club is a product, that a product has a life, a life cycle. The point about all this is that we are constantly reinventing what is the central issue that can engage with large numbers of SMEs ... you are [constantly] reinventing and reinvigorating.”

It is hoped that this brief portrait of the entrepreneurial approaches of Professor Phillips both helps to explain the extraordinary and persistent development of clubs found in Northamptonshire compared to the experience elsewhere, and the dominance of the academic papers stemming from University College Northampton about the clubs. It also illuminates something of the atmosphere of working with those who must bring in more funds to academic institutions and who take on such tasks readily.

#### **‘Consciousness of second-best by green idealists’**

The final example reflects several cases found in interviews with ‘folk’ from different organizations where intermediaries were less happy with the options, or ‘repertoire’ open to them in their institutional circumstances. Comments, either given in explaining their answers or additional to their answers, indicated a certain thread of discontent, linked to a kind of idealism. This appeared not so much the discontent of resistance to new practices found in parts of the literature (for example, Bauer, 1995; Bruland, 1995) nor, in the main, the resignation that comes with cynicism (Fleming and Spicer, 2003) or the practised hypocrisy noted by Brunsson (1989). Rather it seemed to reflect a dissatisfaction with, as it were, the shoddiness of what was being done compared to their own views of what should be done, where normative practices did not meet their own judgement of what was

worthwhile to do.<sup>14</sup> Characteristically, there were references to matters such as great reliance on targets (seen as simplistic and over-numerous), over-use of numerical explanations, diversion of staff from their areas of professional expertise, superficiality of changes, in some cases concerns at smoothed-over, or misleading, accounts of results, etc. These were set against remarks about what might or should be done to further more effective or long-lasting changes, social or practical, to reduce polluting effluents or resource usage. This is a matter which I have not noted in the literature. It is not solely idealism, but a shrinking away from, and a reluctance to identify with, values and practices in the institutional context, (here on the grounds of green issues), and ending in this case, as with a number of 'folk' interviewed, with the person leaving that situation, and contributing to the phenomenon of 'shape shifting' noted among the intermediaries studied here. There was thus both green idealism and disengagement. The subject of this section, David Grantham, is presented as a striking example of this tendency in the interviewees from universities because he had already left his university post, which had had unsatisfactory aspects for him, to do work which he perceived as much more worthwhile. The 'portrait' is preceded by a brief examination of issues raised by the frequent job moves of the intermediaries studied.

Numerous 'folk' interviewed and encountered stayed only in post for a year or so and moved on, for example to major consultancies or self-employment; there were some instances where intermediaries moved to the civil service or to regulatory agencies. It was not possible to research this matter thoroughly, partly because of the speed with which people moved. Ringing an organization, it proved very common to find that the person who had been so involved two or three years before had left and no-one there had known them or remembered where they had gone. Some would later be found in a different guise, in a different initiative, and then be available for interview. In four instances which included the case studies, 'folk' recorded first as working on separate initiatives moved jobs and ended up working together in different roles. The poor traceability when people moved jobs restricted the potential pool of interviewees and the ability to check back on claims but also meant that to draw conclusions about movements between different roles from the situation observed at any given time, 't', would be unreliable, for those who had moved in known ways were, as it were, disproportionately visible, and this occurrence might not be statistically significant if studied carefully, from a vantage point of say, (t-3) years. It does remain, however, a potential topic for future research, because of its implications - much of institutional theory assumes that 'the organization' shapes actors, not that a chain of such organizations, with different roles in patterns of interactions (sometimes regulatory interactions), might shape actors, and that many engaged in a particular field, may have been acting in different roles in quite other fields, which influenced their ways of thinking and acting.

The answers in this interview were some of the most considered; often there would be a considerable pause before a plain, careful and modest setting out of his position. As a water engineer by training, David Grantham had been involved in one of the very early clubs before his

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<sup>14</sup> It has been dubbed here Idealism, not in a technical, platonic sense, nor as suggesting the interviewees claimed they were idealistic; the term merely reflects the aspirational aspects of what was recorded.

move to the University of Lincolnshire, where he had a dual role as “Senior Lecturer/Consultant” in Environmental Management.

“Initially when I was working for the University I was given *carte blanche* - well, within reason - to do what I thought was appropriate; and therefore I developed my own way of working, which included the development role with clubs. The university then changed its angle and I was put into a department dedicated to business development, working with businesses. They had an existing project that needed to be delivered, and it landed on my desk to deliver it, and as part of that there were various targets to be achieved.”

These had included drawing down the relevant funding, facilitating job creation, and advising the companies involved on waste reduction. He had found the project “quite badly put together.”

The work with waste minimisation clubs whilst at Lincolnshire had initially fitted well with his other work; generally it was neither complicated nor difficult and lent itself to student projects, also providing them with work experience. Yet because of the funding structure the emphasis was on engaging with many firms rather than looking at particular firms in depth. He commented,

“Initially it was fine, but gradually it was clear that, well, I felt that a lot of it was quite superficial. Time constraints were introduced and Envirowise-type audits, too. We didn’t really seem to do anything other than make suggestions without much in the way of evidence, where a more detailed study would have allowed you to come up with a more meaningful and regular basis for improvement.”

This perceived superficiality led him to question the value of the initiatives relative to the task of teaching, considering that the balance of activities was not correct.

“The university’s core business was teaching, or should be.”

(It was interesting that all but one of the university staff interviewed stressed, when they need not have done so, their commitment to teaching, and commented on how the circumstances had, or had not facilitated it. This was rather surprising for their engagement with outreach or projects was the reason for interviewing them.) David Grantham expressed a careful view of the circumstances under which he would have found it beneficial to have done outreach work on clubs as well as teaching, e.g. if the arrangements had linked to accredited courses, allowing students to gain professional qualifications concurrently. He, with other colleagues caught in a similar position, had tried to instigate certain forms of research and to set up new courses, but this was not possible; there had been a drop in student numbers and courses were closed.

“Without them, there was no need for involvement; the outreach hinged on them.”

When one of his colleagues left, all such outreach work ceased.

He was not surprised that the clubs had appeared to have only a small impact because of the short period for which they ran, and linked this to the mode of marketing:

“...once you have achieved their aim of working with a limited number of companies, that’s all you do... Most organizations involved were recruited by referral rather than

active marketing. For instance, if a local business adviser learns that a company on his patch is proactive, that is interested in trying out new ideas, then they would be the ones that would be suggested. They would select against the relationship marketing approach, not against widespread marketing. The downside of widespread marketing is that if you do get take up, you just can't deliver it, because you have a limited number of people on the ground. You have to temper recruitment with being able to deliver something. In practice none of the clubs that I've been involved with had more than about 3 people on the ground, and that means you do, perhaps, 3 or 4 companies each."

The 'Account' given in the projects was the standard one, stressing the productivity gains from environmental measures:

"In the reports, the first finding would be the savings, to try to make that link."

Commonly, however, firms were not prepared to invest money or time in the initiatives, and sometimes a failure by the club team to produce savings was construed as confirming current practices within the firm:

".. it would depend on the results, really. Sometimes lack of useful, constructive findings would seem to be evidence of good management, which it wasn't necessarily, but that was the inference."

He had found some things worthwhile:

"to the extent that the projects achieved their aims, then it was satisfactory. But the potential of them was far more, and that wasn't good enough."

He had moved to work for a non-profit, doing not only consultancy with the food industry and running waste minimisation, "with the ability to back [it] up with expanded pieces of work", but work assisting in community-led regeneration in areas of disadvantage. Whilst many problems remained the same, for example, the difficulty of persuading businesses that waste minimisation initiatives could be of value, he clearly found his new set of duties much more satisfactory:

"Now we are doing it for ourselves we are doing it quite differently."

Thus his mode of alleviating the pressures and unsatisfactoriness of trying to marry commercial demands and provide higher education in outreach situations largely dependent on grant, involved leaving academia. Dent and Whitehead (2002:5) talk of the tensions facing individuals trying to negotiate the 'complications and ambiguities' of current working lives where new configurations of arrangements juxtapose managerial practices with expectations of traditional professionalism. They write:

"We are not even certain what it now means to be professional in academia. Does it mean success in an entrepreneurial, performative-orientated work culture, or does it mean adherence to a personal/principle position as enlightened, critical, educationalists?"

and suggest that the erasure of boundaries in organizations is being matched by increasing uncertainty for individuals and their identities in unstable quasi-market cultures typified by

contestation between practices<sup>15</sup>. Lowndes, (1996:194-5) in a more straightforward mode of writing, distinguishes between writers who emphasise the strategic behaviour of actors and use this to explain institutional change, and those who stress that actors' behaviour is influenced by a sense of duty and obligation rather than an analysis of consequences (and are left with a difficulty in explaining change). This final example, with those of the other interviewees whom it also represents, suggests that here the sense of duty and obligation experienced did not coincide with the demands presented by the dominant institution in play, in this case the university as employer, and that the perceived remedy for some of the pressures was to seek release from those complex demands by leaving that employ. This 'twist' on institutional pressures, where there are individual responses to ambivalence of demands and uncertainty as to perceived duties can of course, if repeated over a larger scale, lead to change.

#### Theoretical issues raised by the evidence presented

These rather complex ongoing interrelationships, connections, and arrangements for governance, operating between a number of minor organizations and a very few major players which comprised both the main customers and strategists for the whole, are surprisingly familiar to those who have studied organizational fields. Is it possible that this collection of consultancies, agencies, outsourcing intermediaries and government departments can be fruitfully construed as a field, or representing an emerging field? This, of course, would depend on definition, but there have already been recent leaps in the literature towards unusual uses of the construct (for example, Fligstein, 2001). The discussion in the literature review has suggested that current institutional theory does not delineate the state particularly well vis-a-vis fields (and Fligstein himself complains of this and calls for more research on the topic). It was argued that there is, in much writing on fields, a presumption of state presence and influence, and yet that activity does not appear within the schemas being used for exploration. Organizational fields are presumed to have fundamental normative and regulative characteristics; it is acknowledged that most have multiple governance structures, public, quasi-public and private (Dacin et al 2001:51) yet, there seems to be an absence of enquiry into the means of influence of the state in this. There is a current focus on the (minor) regulatory roles of organizations such as professional associations within fields (for example Greenwood, Suddaby and Hinings, 2002), yet regulatory patterns stemming from state instigated programmes are presently neglected. The state and its regulators are simultaneously treated as exogenous to fields whilst being named as a crucial part of the systems being explored. Vermeulen, Büch and Greenwood (forthcoming), for example, have suggested that the state influencing role is in fact relatively weak in relation to entrenched practices in established and complex fields. This difficulty might be overcome to some extent if the state and its consultancy acolytes were regarded as comprising fields in their own right and explored as such, and this conceptualisation would accord with facets of the discourse exploring the fragmented nature of the state (Frissen, 1999; Ring, Bigley, D'Aunno and Khanna, 2005; Shearing and Wood, 2003). Here, such a conceptualisation

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<sup>15</sup> Here, this was particularly marked by the pressures introduced by the need for supplementary funds from grant projects, etc. and the decline in student numbers.

might see Envirowise and its contract as part of a field concerned, more generally, with the production of displays of policy on the voluntary greening of business. This is an idea put forward as a possibility, as consistent with this evidence, and is not pursued further. Other conceptualisations are possible. An approach focusing on the dynamics of change might see Envirowise' activities as helping, by its provision of literature, conferences and workshops, employment, etc., to facilitate the emergence of a potential field *of intermediaries providing services* in the form of advice on pollution prevention, recycling, greening of business etc. Its work could then be seen as provision of a nascent intraprofessional discourse to this new field, according with the government view of what was appropriate, and as helping to shape behaviour and self-perceptions as part of that new field. A third possibility might be to focus, not on perceived change, but on repetition (possibly needless repetition of the club endeavours) and to see this complex of actions as primarily relational and, as comprising part of 'the business of change', and thus as an essentially a steady state of affairs where approved ideas of business efficiency are conveyed from the state, translated into a given 'Account', and purveyed to one group of targeted firms after another. These potential ways of construing what occurred are pursued in the penultimate Chapter.

### Interim conclusions from the Chapter

Whilst the main conclusions from the empirical evidence are presented in the discussion chapter; at this point, a few remarks sum up the evidence about the various types of 'folk' described here. This has highlighted the often innovative work done to maximise benefits from the prevailing grant regime, and the importance for them of compliance with contractual demands of those grant arrangements, which included, in some cases, the use of bricolage in establishing new and innovative networks. It has also illustrated, beyond these portraits of individual efforts, the poor penetration of the 'greening' message within some government-sponsored organizations at the time. Instead of a mode of finding out, the institutional arrangements pushed most of those examined into a mode of working hard to fulfil expectations for which resources (in most cases, grants) had been promised. Again, the timescales and demands militated against careful self-regulation of what occurred, as did the pressures to continually create and recreate 'webs of relational ties' so that partnerships could be created. Some groups of intermediaries acted as brokers, but brokers of grants, more than brokers of ideas about how best to introduce radical waste reduction. Some, such as the Business Link Advisers, suffered from a disparity between their employers' values, their own green values and the practices in the firms they were trying to influence, and as a result carried out careful, sustained and creative translation, to suit the expectations of discourse found in different fields.

## **Chapter 7. The Regulator and the initiatives**

Regulatory agencies are intermediaries of a different type, standing between the government departments formulating policy and the targeted firms. This chapter examines the role of the regulatory agency in relation to the voluntary club initiatives to encourage pollution prevention and waste minimisation. It examines, processually, the attempts to accommodate and standardise engagement with this voluntary activity, which took place at a time of great cultural change, alongside other contentious developments and the contention to which this gave rise. Regulatory bodies have been presented as simple examples of bureaucratic, hierarchical organizations and little attention has been paid to the threat presented to their core regulatory cultures and styles, and to 'hard-science' based norms, by voluntary regulation. Similarly, the institutional problems and readjustments resulting from the merger of regulatory bodies have been neglected. So, somewhat surprisingly, this chapter is not a detailing of decisions and smooth relationships, but of confusion, and some contention, in regard to the normative aspects of mooted changes to regulatory practice.

The Environment Agencies were formed in the UK just as the international agenda was beginning to view voluntary regulation as a way forward for some intractable environmental problems. Thus, almost inevitably, concerns and reactions to new regulatory forms played themselves out against a backdrop of power plays and gambits both externally and internally: externally, as each new regulatory body established itself in a new, appropriate and wider organizational field in which it might have influence; internally with the development of new operational systems in which tussles over norms and constitutive roles were enacted, with their accompanying heightening or lessening of opportunity for individual departments and actors.

The chapter commences by describing some features of the regulatory remit of the Environment Agency for England and Wales and the basis of its financial constraints. It then relates, chronologically, the interplays which occurred: the attempts made to coordinate and proceduralise work on waste minimisation and the challenges to that work. It highlights the use of different institutional logics and power struggles over staff resources and - given its need to establish respect and thus legitimacy - the continuing contrasts between outward claims concerning voluntary initiatives and inner organizational practice and constraints, and the ways that bricolage occurred within the organization, linked to discourses of environmental ideals.

### **The legal requirements and resource base of the regulator**

The Environment Agency for England and Wales was founded on 1 April 1996. It was intended that the new organisation would deliver an improved regulatory service to industry, providing a

new, coordinated approach, in contrast with the previous regulatory systems. The intention was also that it would be much more business-friendly. The importance of waste minimisation at the time, as a bridging device between the 'old' regulatory advisory approach and the 'new' helpful style which would positively benefit business by bringing financial savings, was underlined by one of the Agency's first actions - a conference on its second day on waste minimisation and its benefits for 'senior decision makers', which featured John Humphrys of the Today Programme as Chair, the President of the Board of Trade, the Secretary of State for the Environment (then John Gummer), and Ed Gallagher, the new Chief Executive of the Agency, speaking on 'How the Environment Agency Encourages Waste Minimisation.'<sup>1</sup>

The principal aim of the Environment Agency as set out in its Enabling Act was to contribute to the achievement of Sustainable Development and alongside this ecological modernisation approach it was also required, by s.5(1) of the Environment Act 1995 to use its pollution control powers for the purpose of:

"preventing or minimising, or remedying or mitigating the effects of, pollution of the environment."

and by s.5(3)(b), if asked, to prepare and send to the Minister reports identifying the options which it considers to be available for

"preventing or minimising, or remedying or mitigating the effects of, pollution of the environment, whether generally or in cases or circumstances specified in the requirement;"

and also by s.5(4) to

"follow developments in technology and techniques for preventing or minimising, or remedying or mitigating the effects of, pollution of the environment."

Its remit to deal with or prevent pollution of the environment was therefore extraordinarily wide. This was a time of many proactive initiatives of all kinds, (for example on recycling, or to improve urban environments) some run by regulators and some not. In April 1996 an Envirowise report suggested there were 22 ongoing waste minimisation clubs in the UK, with 9 more scheduled to start during the year (Walker and Waring, 1996). A number of staff in the new agency had been engaged in proactive initiatives with business in predecessor bodies and expected this to continue, or be improved, with the new agency. Yet despite its stated remit, the new organization had no funding for this work<sup>2</sup> and the funds available for its more mainstream environmental protection activities were also in short supply.

#### Environmental values and the constraints presented by financial rules

From the first there was a tension about the appropriateness of proactive initiatives with business

<sup>1</sup> The conference, *Making Waste Work*, 2 April 1996, at the Gloucester Hotel, London.

<sup>2</sup> (Most work on pollution prevention and waste minimisation was voluntary, and so did not attract funding; with the IPPC Directive and the development of Producer Responsibility came some mandatory measures requiring that factors such as waste minimisation and raw materials usage were brought into the permitting process but they were to affect a limited number of firms.)

for the new organization, even though they were championed by the Board. That Ed Gallagher, the Chief Executive, had been committed throughout to proactive work despite the formal financial arrangements was clearly expressed in my interview with him in the summer of 1999:

“We have money from charging schemes or from grant-in-aid; it’s given on a cost recovery basis, which means that all the money that we receive in charging schemes or grant in aid [goes] on regulation.

“All the other work we have done - we have no strict legal remit to do that... we have no grant in aid to do that; we have no charging income to do that... . All that I’ve done on education is outside our remit.

“The reason that we spend money on these things is that on the front of our Act we are supposed to further the cause of sustainable development. We do not have a budget for waste minimisation or education from government... I am very surprised that people in this organization do not know that.”

He expressed the core problem in terms of the demands of the funding department which had a conception of the role of the regulator as solely concerned with enforcement:

“Their view is that when we complain that we don’t have enough, is that we should cut back on work which we shouldn’t be doing anyway...”

And defended the Agency’s apparent disobedience in terms of loyalty to its primary duty:

“Our job in the Agency is to improve the environment. It’s what we’re here for. We do it four ways, we enforce the law and prosecute where necessary, we prevent waste, and we try and influence new legislation, and we try and educate. Items 2, 3 and 4 are not strictly speaking what we are supposed to be doing.”

But to set out these details is to jump ahead of the narrative. In the new organization, work encouraging waste minimisation by business took place but staff involved increasingly found that there was a need to justify this use of their time. As with messages to industry, at the root of this ambivalent attitude, was an appeal to measures which would cause efficient usage of resources - those on one side arguing that there could be no ‘win win’ with regulatory time; those on the other that there could be, and that there was good evidence of this. Many internal documents were produced retailing the benefits of waste minimisation in improving communication and trust with industry, thus giving potential regulatory benefits in the future, and the cost efficiency of such measures in terms of environmental benefit. Thus the claims-making of the consultancies ‘selling’ the waste minimisation clubs to industry was mirrored by a similar process of advocacy within the regulatory body itself, each of them trying to gain a foothold for change in organisations geared to different priorities, by using new logics of ecological modernisation in justification.

### The organization and the waste minimisation clubs

#### The first attempts at co-ordination and proceduralisation of work on waste minimisation

One of the early tasks of the Agency was to get together those who had been involved in waste

minimisation in the predecessor authorities and to set up measures to co-ordinate the work to provide a unified and coherent service. Cyril McQuillan<sup>3</sup> took the lead in the "Waste Prevention and Minimisation Project" with Martyn Cheesbrough, also from the predecessor body *Her Majesty's Inspectorate of Pollution*, as Project Manager. The aim was to determine how and where waste prevention and minimisation activities might 'contribute to the aims and objectives of the Environment Agency and to co-ordinate and facilitate their implementation.' Cost Benefit Analysis was to be used to justify current and future involvement and to set out a policy with 'justification, correct resources and management information'. There was an appreciation that there was a necessary interaction with future government policy on waste minimisation.

By November 1996, initial meetings led to a note by Martyn Cheesbrough to the Director of Corporate Affairs, pointing out that whilst companies participating in past initiatives had very little to lose and that most had declared substantial gains,

"we and others appear to be constantly involved in promoting and 'kick starting' the programmes."

He suggested that marketing of waste minimisation and prevention might be an important factor and asked for help in developing a marketing strategy

"which would have the primary objective of establishing a demand for participation in waste prevention and minimisation, both from industry and the general public." (memo 25.11.96)<sup>4</sup>.

The vigour with which marketing was to be pursued was to exceed the coherence of the combined strategy.

Other actions in this first year included the production of a *Waste Minimisation Best Practice Guide for Industry* with the March Consulting Group as project consultants. Those involved were kept up to date with the Environmental Technology Best Practice Programme projects by regular summary sheets on that work, and a questionnaire was sent out to assess what other types of activity were taking place on the issue.

The mood during the first six months of the project was very optimistic. Cyril McQuillan considered that the degree of regulation needed could be reduced as operators became more aware of waste minimisation options. It was reported that the Head of Operations, was considering waste minimisation training for all Agency staff and the view was expressed that the Agency could act as Champions for waste minimisation in industry (meeting of the National Waste Minimisation Project Group of 8.1.97). Yet there was increasing realisation of a divorce from some other aspects of the Agency's work: it was pointed out at the January 1997 meeting that there were at that stage no Operational Performance Measures (the standard means of auditing work outputs used within the

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<sup>3</sup> Cyril McQuillan had been involved in an intensive, and more expensive approach to introducing cleaner technologies and practices to HMIP regulatees: the 3Es project - with the initials standing for 'Emissions, Efficiency and Economics' (HMIP 1996).

<sup>4</sup> Copies, or notes from copies, of all such documents cited are held by the author.

organization) for waste minimisation. Earlier, concern was expressed that:

“despite the efforts of Martyn Cheesbrough, there were many waste minimisation actions taking place that the R&D Needs Group were not aware of or only became aware of after the event.”

Key posts in several project teams bearing on the subject, which had been reserved for Head Office Waste Policy staff, remained unfilled.

In February 1997 Martyn Cheesbrough suggested an indicator measure of kg emission reduction per £ of industry saving, which could be later resolved into organic load and toxic load. This might have been significant in standardising measures and linking the voluntary actions taken by firms more closely with the scientific rationale which was routinely used by all in the new organisation, but it was never taken up.

#### The cultural tolerance of bricolage within the organization

The new Agency was very much dominated by the operational style of the previous largest regulator, the *National Rivers Authority*. This organization had been based on major river catchments, and as each had very different characteristics and needs, over time each of the Regional Directorates had come to have a fairly free rein in terms of their operations, priorities and initiatives<sup>5</sup>. There was a consciousness in the new organization that this pattern was continuing with a number of projects of various kinds - not only those relating to proactive measures with business - being instigated in different areas and regions without good consultation with other regions. For example, when I interviewed Ed Gallagher, who had been Chief Executive of the National Rivers Authority for this research, after the formal interview we turned to discuss waste exchange, in which I was then very interested. He advised, in a consolatory kind of way given my failure to make headway on policy on this, to create something in my own region, show it worked and let the others follow suit, as this was the way that many things were brought about “in this organization”.

#### Further attempts at proceduralisation

Sporadic surveys were sent out to try to learn of all the initiatives underway<sup>6</sup>; alongside this there were a number of attempts to introduce more effective proceduralisation, so as to ensure consistency in approach and expectations. One of the first of these was by Sue Kyle of Anglian Region, who produced a *pro forma* (of 29.4.97) which required those involved in a new initiative to set out justifications for it, details of the sufficiency of resources, the potential environmental gains, funding matters, and the review criteria for the scheme. It was largely ignored. In June 1997 a *Waste Minimisation Project Prioritisation Sheet* attempted much the same thing, but crucially was linked to a prioritisation decision matrix for all potential multifunctional projects. In this, given the history of most of those working in the new organization, aquatic matters dominated. The scoring system, with its concerns about meeting river water quality objectives, aesthetic qualities of watercourses,

<sup>5</sup> Even late in 1999 ex-NRA staff were still adhering to regional boundaries from NRA days in carrying out their work.

<sup>6</sup> the first in October 1996

provision of fish migration routes, improvements in hydraulic flows, etc., coupled with the backgrounds of many of those making the key decisions on ranking and expenditure, and the LEAPs system<sup>7</sup>, based as it was on catchments, meant that the balance, when funds were given for non-regulatory work, was very much in favour of the traditional work of improving rivers. Related to the separate institutional histories of waste and water regulation, the term 'waste minimisation' was used within the organisation to mean the reduction in solid waste, and this was conceived as a separate process from 'pollution prevention', the term used for the reduction of liquid wastes; this meant that it was difficult to argue that benefits of 'waste minimisation' projects would be wider and might accrue to water usage, effluent reduction, energy, etc.

#### External and internal approaches to waste minimisation work

In its first two years, the public statements of the new Agency continued to applaud and cite waste minimisation initiatives as one of its triumphs. One of the first publications, (Environment Agency, undated) in a series on sustainable development, was entirely on waste minimisation and its benefits, retailing Agency work to reduce waste at source, and outlining the successes of 10 waste minimisation projects which the organisation was supporting. Lists of benefits included the claims that:

"Waste minimisation can assist economic development" and

"Waste minimisation involves the Agency in advising businesses and spreading the good news of what it can achieve."

Yet things were not straightforward; whilst there was stated support at a high level, the remit of the waste function - part of the regulatory remit - was to *manage* waste that had already been produced. This was a large and important function, and so was the corresponding industry. The early publication, "*An Environmental Strategy for the Millennium and Beyond*" of September 1997, began by stating that sustainable development was at the heart of its role and outlining its business-friendly and inclusive new approaches - prosecuting only where necessary "in cases of gross, blatant or persistent infringements of the law," "preventing pollution and other abuses of the environment by taking action, where possible, well in advance," and "working with all relevant sectors of society in order to deliver sound and cost effective environmental management", but the emphasis in the document overall was on *managing* waste safely. Further, this traditional waste function was itself under pressure within the new agency. The arrangements for merging the earlier, separate organizations in a new management structure appeared neutral but tended to benefit the dominant groupings; at first this was the senior water regulators. For example, early appointment procedures used a measuring system which preferred those who had managed significant numbers of staff; this was bound to favour those from an NRA background (with several thousand employees) in contrast to managers from the numerous small Waste Regulatory Authorities where total staff was often less than 20. This rivalry for resources was to show itself repeatedly in the

<sup>7</sup> Local Environment Action Plans based on catchments were the main organizational links to local authorities; in such schemes items which would improve a significant part of a defined catchment were likely to score highly.

first years, as the waste function, relatively powerless at first, aligned itself with formal traditional regulatory modes, and increasingly eschewed preventative activity.

#### The creation of the Prevention and Minimisation Programme

In June 1998, the administration and lead function for preventative activity for firms was assigned to a section of a new national unit. Martyn Cheesbrough, (who was a member of the committee overseeing the work of the ETBPP), was made Prevention and Minimisation Programme Manager. Crucially, however, the tasks of waste minimisation and pollution prevention were kept separate, and referred to separately in nearly all discourse around projects. Such a distinction meant little to businesses and may have been a barrier to their involvement. Head Office work was defined by function - and water and waste formed two distinct directorates. The 'functional chimneys' of the policy-setting teams were also foreign to the work in the local offices where water and waste work was combined. The new unit, the Environment Protection National Service or EPNS, was part of a national service to advise on environmental protection. Significantly, for a study highlighting the use of intermediaries, alongside its small full-time staff the unit employed a variety of consultancies, including ENTEC UK, ETSU, Foster Wheeler, the Water Research Council and W. S. Atkins, to carry out many of its projects. The presumption was that regional waste minimisation co-ordinators would provide a focus for Waste Minimisation activities and link those working in the area offices with the requirements of the Head Office policy staff. Yet the character of the arrangements and the level of activity in different regions continued to vary (note of national meeting dated 9.6.98). As time went on, financial pressures and shortage of staff in some area offices, coupled with a rigid system requiring liaison meetings on topics defined as bridging disciplines by functional departments, and the long distances between offices, meant that there was sometimes more discussion about action than activity. In some regions concerns were voiced that EPNS may not have had a full understanding of the work being carried out in the Regions and Areas and the constraints they were under and this made their discourse promoting prevention much less powerful.

#### Criticisms of the waste regulatory function

During its third year the organization was criticised heavily, particularly in regard to its role in relation to waste and the poor performance of its traditional inspection-based approach. Whilst these criticisms were often linked with calls for more to be done on prevention, and there was continued support for preventative approaches voiced in official publications, the sharp and insistent nature of the critiques caused a reaction of reasserting and focusing on what were seen as core roles. Many of the older, skilled local inspectors had left the new Agency, associated with concerns about pay and career prospects; there was no effective system for training new staff at the time, but the system demanded a given number of inspections of waste facilities according to their categorisation. Great efforts were made to deliver these but they were often carried out by inexperienced staff. The standards regarding inspections had been set at a time when more staff were available and attempts were made to represent the percentages of the visits actually done as in line with policy. In any case, the organization, like many across the country at the time, was awash

with targets and performance measures, many of them set out by managers without great understanding of day-to-day processes and constraints. For example, not only were there 'aspirational targets' from the Government's Waste Strategy, *Making Waste Work*<sup>8</sup> (which had not been linked to any clear mechanism for implementation), but also large numbers of internal targets, on top of those for routine inspections. To give examples related to waste minimisation, Thames Region was charged with carrying out 3,594 National Waste Producer Survey visits (which had waste minimisation elements); they were also required to deliver "action plans" for 26 companies under the Top Ten Targets for Waste Minimisation<sup>9</sup>. Few staff understood what 'action plans' constituted and there was no guidance with the original documents setting out the targets. This plethora of demands contributed to a sense of confusion, and a tendency to focus on routine modes of deploying staff which could not be criticised, whilst waiting for further guidance before diverting staff to work on new matters.

Pressures on all waste regulators mounted in the face of the many and very diverse targets and because there were severe shortages of experienced staff in some Areas. In May the ENDS report published an exposé (1998:25-28) which began:

"Inspection targets have lately been chopped and changed seemingly at whim, with damaging effects on staff morale and enforcement work and allegations of fiddling of inspection records. Former local authority officers feel cheated by waste regulation's lowly status and the appointments process. Staff disaffection has been compounded by a recent reorganisation which left many with lower pay and gradings than expected..."

This article is particularly interesting because it highlights themes expected if one takes an institutionalist view of the changes occurring in the regulatory body and in the intermediaries around it. The criticisms appear to expose symbolic claims making, and to set out the conflicts which are felt when changes in constitutive roles and deontic powers affect professional roles, and appeals to older practices in line with established values. It went on to allege that the organization was

"more concerned with corporate image than environmental protection."

The report highlighted the lack of power of the waste function in the new combined organisation - it is described as having 'lowly status' from the outset because it was widely perceived as a 'low-grade activity' and with a policy team of only 10 staff compared to the 'sizeable central policy teams' in Bristol from the NRA.

The article also exposed falsification of visit records and so-called 'Drive By' inspections by inspectors trying to be seen to meet targets, under pressure from their new managers whose bonuses depended on their doing so. The problematic targets, the article claimed, were derived because of a need to preserve the grant-in-aid at a level sufficient to appoint further waste inspectors and to

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<sup>8</sup> These listed the objectives "to reduce the amount of waste that society produces; to make the best use of the waste that is produced; to minimise the risks of immediate and future environmental pollution and harm to human health; to increase the proportion of waste managed by options at the top of the hierarchy."

<sup>9</sup> In 1999/2000 the national target became, in the Corporate Plan, "encourage 100 organisations each year to develop and implement action plans for minimising and managing their wastes."

authorise a 20 per cent increase in the charging structure for regulatees (see also *The Waste Manager*, May, 1998:5). This tension from the strictures of inadequate funding, within a culture of audit, and the patterns of congratulatory claims contrasting with evidence of bricolage, was to be repeated in the next few years.

The month following the ENDS article, the Agency was severely criticised by the House of Commons Sustainable Waste Management Report (June 1998). As noted above, this criticised the quality of work carried out and called for more action on waste reduction, (para. 17) rather than mere talk. At para. 41 it stated:

“Waste reduction should always be considered as a precursor to the implementation of the BPEO (best practicable environmental option) in any specific instance.”

These criticisms were in line with opinion in the EU that governmental organizations should provide more proactive advice to businesses, especially small and medium-sized enterprises. Whilst these public acknowledgements of their difficulties were heartening to those calling for more proactive work by the Agency, they provided neither more power for them to take action on waste minimisation, nor more money to pay for it.

In November 1998 an ‘Interpretation Guide’ for Waste Minimisation Targets was produced, to counter the ‘general confusion regarding the status and interpretation of the different national targets’ which had been set out in the Corporate Plan, the Functional Action Plan and the Top Ten Targets, providing careful definition of the terms in these documents. The definition for the term “encourage” gives a flavour of the corporate language being used, and the expectations of understanding and conformity with careful terminology by local teams:

“means to *inspire, stimulate, influence, persuade, sway, advocate, invite, recommend, foster, further, promote*. This implies an active role which goes beyond the level of a simple phone call or the forwarding of guidance materials. Encouragement will generally involve one to one or group communication activity where the principles and relevant details of the approach can be explained in a way that achieves acceptance and action on the part of the industry concerned.”

The concern at the poor standards of waste regulation within the new body continued. ENDS noted in May 1999 “widespread industry concern that local Agency personnel lack the experience and training required.” (pp 39-40) There was a strong perception both by industry and within the organization that staff should be seen to adhere to the perceived values of the regulatory culture. The newly promulgated logics of ecological modernisation and of a ‘natural’ alignment and synchronicity between regulators and business regulatees, failed to impress many of the workforce. A survey of staff reported in ENDS (May 1999:7-8) found that

“enforcement staff relate poorly to the concept of industry as their ‘customer’ and have been left unsure whether their job is to police compliance with legislation or be ‘nice to industry.’ ”

The reported recommendation to management from the survey was that it should ‘support

enforcement activity.' This disgruntled in-house culture supportive of perceived old-style regulation, backed as it was by a financial system which provided funds only for formal regulation, helped to further stymie preventative activity. There was already dissatisfaction at the co-ordination of such work, as shown in the draft policy document on waste minimisation (EPG 170) produced in November 1998. This stated (para 3.4) that

"The waste minimisation effort of the Agency and its partners is generally uncoordinated, opportunistic and inconsistently applied. The increasing number of initiatives and organizations involved has also led to some confusion and duplication of effort, and to increased demands on Agency resources."

The document went on to state that the organization was "involved with 100 initiatives throughout England and Wales." (para 5.1) Even without the intransigent views of many senior managers, the administrative complexity of formally instigating a more secure foothold for waste minimisation was daunting: the document set out (Annex 1), 22 internal groups at national level which would need to be involved in the communication and implementation of the new policy, these included the Directors' Group, Water Quality Managers' Group, Water Management Directorate, and the Operations Management Team.

The policy document was finally 'rolled out' in May 1999. The accompanying press release began:

"An Environment Agency drive to help businesses cut the costs - both financial and environmental - associated with producing waste, is about to take on a new national impetus. The Agency is already involved in more than 100 projects across England and Wales supporting companies minimise the waste they generate"

It continued with statements from the Director of Environmental Protection, Dr. Paul Leinster:

"We are committed to developing and supporting new initiatives to achieve waste minimisation. This can range from partnerships with waste minimisation clubs to campaigns focused on particular industries, or educational projects. The point is that everyone benefits."

and

"The Agency's work to help minimise industrial waste is a central part of broader efforts to reduce the use of our natural resources in society as a whole."

During that summer there were further statements reiterating support for waste minimisation activity. A project based in the North West Region on the Future of Environmental Protection Regulation was instigated to investigate the best way to reorganise the Environment Protection Service. The staff unions' National Negotiating Group was told that under the new arrangements contemplated,

"the vision of the future of waste is waste minimisation," and that  
"reduction will be the main measure of Agency progress rather than  
inspection numbers and licences issued."

This public reiteration of the Agency's acceptance of the ecological modernisation credo did not, however, bring to an end pressures to end waste minimisation work by the Agency.

### Actions to improve proceduralisation but continuing bricolage

In July 1999, a draft document setting out waste minimisation performance measures was produced by the Environment Protection National Service. This was aimed at the selection procedures for projects, and for business planning purposes; completion of the measures listed would enable the projects to be listed in the annual review. This was followed a month later by a consultation on a 'Process Handbook' for Waste Minimisation, written by Jan Hester of South West Region and setting out the formal procedural framework which should be followed for waste minimisation work and projects. Each key activity was carefully described, allocated a reference number, divided into different steps, each with their accompanying actions and outputs and [lengthy] criteria for its successful completion, along with reference materials. A Waste Minimisation Initiatives Database was set up to keep track of projects, but not all were included. In the autumn of 1999 there were discussions on a research project to evaluate the 'environmental, societal, business and regulatory benefits of waste minimisation', but no action was taken at the time. Through all this, Jon Foreman, the remaining waste minimisation adviser at EPNS worked doggedly on, committed to the approach and continually defending it.

These attempts at co-ordination were necessary because it was known that in many Areas, waste minimisation projects were being set up and run, often very successfully, but with no consultation with national officers, no adherence to the promoted procedures and frequently with no formal evaluations being carried out. For example, a Tactical Planning Officer who had run several such initiatives, explained the activity had grown out of their previous role in the waste regulation authority, it had been unremarked when the work had started and after a while no more questions were asked:

"I think [this] Region get told off quite a lot; we have got quite hard skins now; we don't care. My manager is very very supportive and we can basically do what we want with him as long as we can justify it."

And again,

"... we don't have a problem with it; it's my Team Leader now - if it's not going to cost the Agency anything, my Team Leader is happy with how I use my time... he quite enjoys that work too and used to come along to present."<sup>10</sup>

The proliferation of waste minimisation clubs to demonstrate best practice was not unusual; many other waste and recycling projects were being carried out at this time which were considered to be unnecessary or to involve 'wheel reinvention' and this may well have reflected the uncertainty in and vagueness of waste policy, and there was a recognition that such work was often 'fragmented and discoordinated with considerable evidence of duplication of exploratory initiatives'.<sup>11</sup>

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<sup>10</sup> At the time of this interview in August 2001, this approach, which had continued in this Region for some years, was quite counter to national policies on use of manpower - see below - but had resulted in successful projects which were widely praised.

<sup>11</sup> Minutes of meeting to discuss "Future Strategy for Waste Management Research" 3-4 May 2000, attended by representatives from the Environment Agency, DETR, DTI, SEPA, Waste Watch, IWM, and LGA amongst others.

### Alan Dalton's intervention

With resources under pressure, criticism of the Agency's stance on regulation, and reorganisation anticipated, struggles intensified over suitable economies and sensible deployment of staff time given the needs of the different directorates. There was a need in the meetings that were held for senior managers to be seen to be making clear decisions to cut back on some form of expenditure. Minimisation had few champions at a senior level, and provided an easy 'scalp' if services were to be cut, for, unusually amongst the competitors for least valuable activities, there was not a statutory requirement to perform it and there were few to argue for it in the most senior committees. Yet attempts to cut back entirely caused political problems. In December 1999 Ed Gallagher was forced to 'clarify the state of play on non-statutory waste minimisation' following the intervention of the radical Alan Dalton<sup>12</sup>, then on the Board of the Agency.

A previous paper to the Industry Advisory Group of the Agency (99/15) had reported the conclusions of an *Environmental Task Force* which reiterated the need to cut back on non-statutory work, and as was becoming almost a ritual in such papers, reduction in "aspects of Pollution Prevention and Waste Minimisation" was once more seen as a suitable candidate for sacrifice. The paper noted that

"all regions have been asked to reduce Agency resource commitment in pollution prevention and waste minimisation to that which would support the current lowest regional service level."

This had been questioned by Alan Dalton and Ed Gallagher backtracked, explaining that what had been meant was that

"regions have been asked to produce plans to support the current lowest regional service level."

He stated that such plans were still to be reviewed by the Directors and went on to explain that the issue was not yet resolved and that his own view was that reassessment was needed

"Doing more pilot projects to demonstrate over and over again that waste minimisation works may not be the best way forward,"

thus mollifying both directors and managers concerned at staff being involved in too many projects. The outcome was again indeterminate, but the intervention helped waste minimisation activities to survive. (In fact, despite the brouhaha, the cost of the time of senior managers to enter into such lengthy debates may have been disproportionate to any savings likely from further reducing the official involvement, for in mid-2000 there were only 4 staff working on pollution prevention or waste minimisation in the national unit although there was activity elsewhere. The other option which might have reduced it would have been to energetically investigate the savings being claimed by some of the clubs, and the evidence for their success - but neither was done.)

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<sup>12</sup> See his obituary by Rory O'Neil, *Guardian* 16.12.03

### Responses to measures linking waste reduction activity to core regulatory responsibilities

The national staff concerned with waste minimisation were placed under increasing pressure, and memos and minutes from 1999 onwards reveal increasing concerns at their lack of resources and the setting out of reasoned justifications why waste minimisation was a worthwhile activity and attempts to legitimise it by pointing to national policy objectives with which it fell in line. There were two main developments. During 2000 the unit within EPNS changed their strategy and began to take steps to ensure that waste minimisation work was carried out on approved campaign areas: tyres; healthcare wastes; construction wastes, work to provide information on recycling and recovery organisations, the landfill tax credits scheme, and the production of a web page.

There were also changes which more effectively linked waste minimisation work with the standard inspection regimes required of, and respected by, the rest of the organisation - in regard to producer responsibility, the IPPC consultation and, to be highlighted here, the minimisation of hazardous ('Special') wastes. In January 2000 the DETR announced a fundamental review of the regulations on this matter, and their identified objectives included promoting 'a reduction in the quantity and hazardousness of wastes.' The expected Landfill Directive would restrict co-disposal (a pragmatic British system of mixing hazardous with non-hazardous wastes at landfill sites) and these developments gave those propounding prevention approaches a 'hook' with which to link their aims with those of statutory regulation. The precedents of the Irish and U.S. national plans for hazardous waste reduction were cited in the published *Agency Waste Minimisation Policy Statement*, which claimed:

"The Agency will work directly with government, and in partnership with others, to inform, educate, influence and facilitate measurable reduction in the generation of all types of waste to promote the sustainable use of natural resources."

It was argued that:

"with relatively minor adjustment, it will be possible to utilise the natural 'communication channels' provided by the Special Waste process to further the pollution prevention and waste minimisation aims of both the Agency and Government."

There was a statutory requirement for regulators to visit firms known to produce hazardous wastes to check on their procedures and as part of this it was usual to advise on ways of reducing their production of such wastes. Targeted dual visits, it was argued, would save resources.<sup>13</sup>

### Outward support for waste minimisation initiatives

Whilst there were internally clearly difficulties with manpower and attitudes towards preventative work, the outward face of the Agency still supported such voluntary approaches. By autumn 2000,

<sup>13</sup> Joint presentation at Special Waste Producer Visit Pilot Training, 19 October 2000, by Jon Foreman and Chris Grove. The national groups concerned with Special Wastes, which, in an organisation committed to science and revering chemistry, had considerable status, not least because they were under continual pressure in regard to production of, and conformity to, scientific explanations of the rules adopted. There were pressures for more 'Special Waste Producer Visits' to be done.

the organization had produced a number of publications telling the ‘good news’ of waste minimisation and expressing the simplistic logic of ‘win win’ and expected financial benefits. These included a board game on waste minimisation as well as a 20-page leaflet and video, both with the same astonishing title: “*Money for nothing and your waste tips for free,*” and an Environmental Good Practice Guide for Industry (a detailed workbook setting out methods to instigate waste minimisation, pollution prevention and resource efficiency measures). A survey was carried out on the use of these last three aids, and of the 32 respondents, over half had implemented a programme or intended to do so; some had already made savings. Curiously, only 17 of the respondents were businesses; 9 were business support organisations or consultancies. The publications also included a software tool produced in association with ETBPP which would help businesses set up waste minimisation programmes.

Matters went further than this, for the PR arm of the Agency frequently made use of good results from the kinds of projects heavily criticised in other fora. Involvement in waste minimisation clubs still provided good publicity. The Tactical Planning Officer interviewed above remarked of his clubs:

“It is very good PR; we have had quite a few press releases from it and one of the things that makes me laugh is we get told we haven’t got time to do this - but every time we get a bigwig coming round, it’s “Can we take them round...?” We are not important but they are happy to show us off.”

#### Further criticism of the Agency and reactions to it

Coupled with this confusion in regard to activities on waste, a damning report by a House of Commons Select Committee found that the Environment Agency’s lack of a ‘cogent ethos and strategy’ was having a negative effect on the performance of its functions and the way it was perceived by industry. The report found that few improvements had been made since the Committee’s earlier inquiry into Sustainable Waste Management, and expressed particular concern at the lack of action on fly-tipping, calling on the organisation to take “urgent steps effectively to tackle this very serious problem” and, more widely, to “improve the competency of its staff in the waste management function.” This report paved the way for a spectrum of changes - in particular the new ‘Environmental Vision’ for the organization under the new Chief Executive Barbara Young - but also led to a deepening mood of intransigence by some senior managers which resulted in attempts to defend and improve the standards and provision for ‘normal’ waste regulation by backing away from ‘unnecessary’ engagement with preventative actions.

The problems were reviewed in an article ‘Where is the Agency going?’ in *Environment Business* magazine in October 2000, which considered whether the organization’s campaigning role was compatible with its primary role as a regulator, and its level of resources. The article commented:

“As this advocacy role has developed, the grumbles of discontent from industry have become louder.”

The case for formal Command and Control regulation, American style, and nothing else, was put,

predictably enough, by an environmental lawyer and by a representative from the Environmental Services Association (the trade association for the waste management industry).

“it [the Agency] has this odd notion of encouraging compliance and educating industry. It’s frankly not a role that it should pay much attention to. You don’t get a policeman going around telling you how to drive on a motorway. Somebody should be but it isn’t the role of the Environment Agency.”

This blithe disregard for police practice and British regulatory history nevertheless sums up an industry attitude which had become much stronger as the charging regime<sup>14</sup> had become more expensive for the larger firms - it was increasingly being seen as inappropriate for the regulator to give advice or provide education. The perceived role of the regulator by these groups, was to verify, to audit, and to enforce when necessary; other organizations should take on the mantle of education. The waste industry representative, (echoing Stigler’s view that the regulator acted as the servant of its regulated industry), was clearly of the opinion that their regulation and permitting took precedence over measures to help firms prevent waste:

“Clearly when you get the regulator starting to produce things like children’s games, it is a signal that focus is being lost. I have never heard the Agency come out and say that it is over-resourced and when it has very important statutory duties, the natural conclusion is that it should focus on them.”

Ed Gallagher, by then the outgoing Chief Executive, ever faithful to the ecological modernist approach, gave his response in the article: he believed the roles could be combined; he did not see that the shortfall in resources should stop the Agency attempting to prevent waste in the first place through education and campaigning, alongside its other duties.

The new Chief Executive, Barbara Young, also continued to present an ecological modernist view of the issues. For example, in an address to the All Party Parliamentary Group on Sustainable Waste Management (9.5.01) she described her new “Environmental Vision”, a strategy document setting out long term aspirations for the organization which included “wiser, sustainable use of natural resources” and outcomes which the organization would help to achieve such as “both business and the public sector will be adopting and implementing long-term strategies to reduce the consumption of energy and resources.” She also aligned the position of the Agency with that of EU strategy , stating that just as the proposed direction for the EU focus on waste was in the context of waste as a resource, “this is very much in line with EA thinking in our Vision and Frameworks.” The long-term objective of the organization, she said, was that “business, public agencies, other organisations and individuals will minimise the waste they produce. They will reuse and recycle materials far more intensively, and will make more efficient use of energy and materials.” She set against the growth in municipal waste (then estimated at around 3 per cent a year), the need to slow this growth and, touching on the concomitant need for many new waste management facilities, to raise awareness of the issues, ensuring that waste was managed according to the best practicable environmental option.

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<sup>14</sup> the system under which firms contributed to the costs of their activities being inspected

### Formal means of controlling activity, including that on waste minimisation

Alongside the increasing co-ordination and proceduralisation that was occurring to formalise waste minimisation work in the Agency, there were other mechanisms in use, especially regarding Service Levels, which were much more powerful. Short of funds and manpower, the organization assigned staff to problems by means of a process called EPPPE, the Environmental Protection Priority Planning Exercise, which assigned 'service levels' and numbers of FTE (full time equivalents - i.e. a measure of the work of a typical person) which could be deployed on particular matters. This mode of control grew increasingly strict, making it harder to justify the deployment of people to work on any matter which was not set out in the EPPPE tables for the particular financial year. This often ran quite counter to public statements by members of the Board, who would assert that staff time would be spent on a particular problem, probably unaware that no real changes could be made until the bargaining process led to new weightings being laid down for the new EPPPE and even this would not come into force until the next financial year; there was no mechanism to speed this up. There were few voices involved in prevention activities in the determining committees. For 1999-2000 the waste functional guidelines had given waste minimisation a low priority - category 'C'. By the financial year 2000-01 the formal national service level for waste minimisation activities was reduced to:

"Reactive Agency support to initiatives or campaigns run by others, through staff time or financial sponsorship. Dissemination of waste minimisation advice via involvement with other activities, e.g. special waste visits, waste surveys."

Thames Region, for example, (which covered the whole of the Thames Basin, including London and much of the Home Counties) allocated 3 FTE to achieve this service level and Jon Foreman the National Waste Minimisation Adviser estimated that the total allocation was certainly less than 10 FTE for the whole of England and Wales (telephone interview 18.6.2004).

These strictures on staffing were further underlined by the stipulation that at least 50 per cent of the work on these topics must focus on the agreed National Campaigns - tyres, oil care, groundwater regulations, construction, healthcare waste minimisation and special waste minimisation. These effective controls on staff allocations were not high profile and meant that there would be no reoccurrence of the Directors' debates on prevention. By the summer of 2001, whilst some regions, for example the South West and North West were still active, there were complaints at the National Waste Minimisation Co-ordinators Group [25 July 01] that in North East Region there was a shortage of resources and work on Prevention and Minimisation was being 'hidden' (by not being put on the time recording system) or refused. In August of that year, the voting exercise for the next years EPPPE recommended stopping all remaining work on preventative waste minimisation beyond that within the legislatively defined role and reducing work on Pollution Prevention (reducing water usage and liquid effluents) to 13 FTE nationally. The level of this commitment to work encouraging voluntary resource efficiency changes can be seen by considering that the total workforce for Environmental Protection at the time was 2,729. (i.e. notwithstanding public support for non-statutory preventative work, the level of commitment to it expressed in the final year of this study, was less than half of one per cent of the resource available).

A memorandum from within EPNS at the time talks of this as

“an awful proposal... The Agency currently allocates no more than 10 FTE (probably much less) to ‘Proactive waste minimisation’ work. Stopping this will be like throwing the baby out with the bath water...”

The arguments used in the memorandum were typical of those deployed to defend preventative activity at the time - appeals to shared norms and policies across the organization - that such a reduction would undermine the strategic role and influence of the Agency with Government, that it would run counter to the remit of the organization set out in the Environment Act 1995, and to established policies and forthcoming claims, for example concerning Sustainable Development, and in the Annual Report. For example:

“Illustration of the benefits of our waste min. work are set out in the Annual report which will be released at AGMs. This would seem to present an embarrassing paradox?”

The arguments also imply that co-operative working with Envirowise and similar bodies was valued:

“The message that waste min has been stopped will effectively block the development of using our inspectors ... to act as signposts for Envirowise, CIRIA, etc.”

as was the work of the committed environmentalists for the organisation:

“This proposal will seriously reduce (yet further) the morale of a significant number of committed Environment Protection and Water staff which will in turn undermine our reputation and influence with stakeholders. Anecdotal evidence would even suggest that some would be persuaded to apply their skills elsewhere if this recommendation was adopted.”

There are also arguments stressing the need to continue to work with regional partnerships:

“One reason for the perception in the minds of senior managers of the need to drop this sort of work may be the oversupply in some areas/regions of mega EU funded projects (e.g. Groundwork in the North West, Arena network in Wales). However, such scenarios provide all the more reason for the Agency to be seeking to influence these initiatives for the better. There is strong evidence that these projects need clear steering and our waste min. work has evolved to ensure we have the experience and ability to interface with these projects through regional partners. If we pull out, there would be a serious risk that the environmental dimension will be lost from these regional projects.”

This defence of the waste minimisation programme reveals something further: that at the highest levels of the organisation there were staff who were impassioned about the need for voluntary preventative approaches to bring about change in resource usage. This chapter concludes with this impassioned memorandum, for at the end of 2001 - the final year on which this study focuses - the matter remained unresolved.

## **Discussion**

The evidence of this chapter shows the ambivalence and indecision over support for voluntary initiatives promoting resource efficiency within the regulatory body during these years and the

failure of very senior managers, in the face of funding structures which preferred formal modes of regulation, to work out a consistent policy in regard to that role. It reveals ways in which the discourse varied - the outward reassuring ecological modernist statements in press announcements, the more deeply entrenched attitudes supporting traditional numerical inspection regimes against new approaches by senior management, and, at the grass roots, evidence of some determined bricolage in order to further work that those involved saw as vital, in spite of numerous strictures against it. This is interesting, because so much of the 'greening of business literature' rests on conclusions reached from one contact within an organization; this raises questions of complexity and conflict, and the fact that even in an organisation where bureaucratic controls might be expected as the norm, setting up a policy and enforcing it were difficult to achieve. The manipulation of organizations referred to in parts of the literature as prejudicing 'consumers' whilst serving bureaucrats and politicians (presumed to act together, and to have coincident interests) appears far more complex. In many cases businesses gained from waste minimisation initiatives; others lost - there were no measures to ensure geographic equity in these new services.

Whilst this evidence seems at variance with the depiction of regulatory agencies in much of the literature, which stresses their bureaucratic characteristics, it was interesting to learn that Prof. Keith Hawkins had also observed such discontinuities between the cultures of combining inspectorates in respect of the HSE, which had been created from a number of predecessor organizations. In response to questions at a CARR seminar (14.3.04) he recalled sitting, in 1982, with the then chief inspectors of the Factories, Mines and Quarries, Industrial Air Pollution Inspectorate, Agriculture and Nuclear Installations Inspectorates, and how he had formed the view (and he stressed that these were his assumptions but ones in which he had some confidence) that they not only acknowledged and were concerned at differences in practice but further, that each inspectorate did not know what the others did (and the hope of rectifying this had been instrumental in their granting permission for his subsequent research on the organization). He linked this to his observation in *Environment and Enforcement* (1984:9) that 'regulatory control is characterised by an ambivalence which has both political and moral dimensions' It is interesting that the political aspects of this ambivalence - which Hawkins describes as set around the opposition of constituencies of ideas, one sympathetic to an active policy of enforcement to restrain the unregulated activity of business and one opposed to state interventions which burden business activity - are here transposed to contention over voluntarism. Some valued voluntarist action by business and proactivity by regulators and others were wedded to traditional approaches to regulation based on legally determined routines. Such conflicts also reflect other core policy issues for regulators highlighted by Hawkins and Thomas (1984:11): the establishment of priorities in the allocation of resources among competing demands for action by law enforcement agencies. The managers were in a position where, to increase the security - and extent - of their funding, they wanted to be seen to produce results and also to be seen as efficient; a hard matter for a traditional regulator in a compliance culture.

It is salutary to note parallels with Hirschhorn's remarks (2000:66) concerning the US that 'internal resistance successfully limited pollution prevention within the bureaucracy, in terms of funding, staffing and influence' linked to that organization's "existing pollution control culture and regulatory system." For the chapter indicates that significant elements within the regulatory body were, culturally, wedded to a particular regulatory order, predicated on pollution control: pollution prevention was an approach counter to the accustomed practices of the bulk of the workforce. This way of conceiving their role links to the views of Stigler (1971) that regulatory bodies see their work as intimately linked to that of their traditional regulatees, if not supporting his further contention that they work for those traditional regulatees.

This study is very much, to use a distinction drawn by Lowndes (1999), a study of new institutional forms from an approach dominated by comparatively recent institutionalist theory. Even over the relatively brief time span considered by this study, institutional change in the public sector is seen to have been fraught and difficult to bring about; the welcoming of new modes of regulation within many policy networks was not echoed by the body of the Agency, and previous norms and cultures were powerful. Yet again, voluntary regulation, even with the backing of state departments - here the sponsoring department - is shown as in conflict with, and foreign to, operational norms deriving from pre-existing power and governance structures, and operational patterns of work in the organizations involved. This was a regulatory organization, with rules at its heart - but rule following within it was not automatic; nor was it easy for those at the top of the bureaucracy to impress their views across the organization. The sponsoring department could not convince the Chief Executive to abandon his ecological modernist approach with its trust in business responses; the Chief Executive could not convince the senior managers, and these senior managers could not - until the mechanism of accounting for time (that true currency of regulation) was in sway - impress their wishes on those at street-level. March and Olsen (1989) contrast a 'logic of appropriateness' with a 'logic of consequentiality' yet the individual inspectors highlighted here did not follow a logic of appropriateness in relation to the power structures within the organisation, but rather an idealism - which may have derived from the earlier cultural norms they had experienced in previous posts or from previous contacts. This links to a factor<sup>15</sup> which is rarely raised in institutional accounts - many in the workforce today spend relatively short times in any particular organization or activity; their experience and the norms under which they operate are multiple and complex and their expectation is that they will leave any particular post, or organization, within a few years for better circumstances elsewhere. The tenuousness of their relationship to organizational norms may be increased where they work frequently on projects peripheral to the main aims of that organization. These dynamic and cultural aspects of the intermediaries' work will be considered further in the following chapter, where the issues raised by the empirical evidence regarding the various intermediaries are discussed.

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<sup>15</sup> Also raised in Chapter 6.

## Chapter 8. Relating the findings about intermediaries to constructs of institutional theory

The focus in the evidence chapters has been on the intermediaries involved who ran the initiatives and who also presented claims, and sometimes theoretical interpretations, about them. It is argued that these intermediaries are an important, ever-present corollary of this style of voluntary regulation, influencing what comes to be known about the initiatives. Most voluntary initiatives, if evaluated at all, have been assessed individually, as separate projects, shortly after they ended, with the focus on the achievements of participating firms and ignoring the roles of the consultants and the influence of the organizational form concerned (here it might be considered the grant-funded partnership project). This chapter reflects on the empirical evidence concerning the consultants, regulators, business advisers and university staff who worked on this set of policy initiatives. It is organised in terms of the research questions given in Chapter 4, in each case drawing out the implications of some of the significant findings of the study. It sets out ways that the claims of the intermediaries, their position, and their relationship to rules might be construed in terms of institutional theory and some of the implications of these ways of viewing for voluntary regulation. The chapter begins by considering the claims made and their reception, examining one possible way of construing them theoretically which highlights both reflexivity and normativity, demonstrating part of the argument by reference to certain counterclaims.

### Accounts and Counterclaims

This section of this chapter relates to the first theme of the research (set out in Chapter 4) and its research question, which asked:

**"To what extent does the use of the construct of 'Accounts' assist in understanding the differing claims made in voluntarist, short-term initiatives supported by the state?"**

It considers the claims-making in the light of the construct of 'Accounts' (explained in chapter 3). First the dominant Account is set out, then others in contention with the more official claims, [some of them given in confidence and so not formally reliable (McNeill, 1990:14), and deriving from 'opportunistic', rather than probabilistic, sampling (Honigman, 1982:81)]. There is then a discussion, considering the issues raised by this mode of presenting radically different explanations of occurrences.

'Accounts' are creative ways that people use to present an endeavour which can be recognised as both rational and concurring with other common value systems; they have the characteristic of setting up, reflexively, expectations of what *should* occur (Healy, 2004, extending the definitions of Wuthnow, 1996 and Scott and Lyman 1968). Crucially, whilst linking to normative considerations, they can be seen as shaped by the (often new and emerging) institutions in operation. Accounts,

(which can be found, for example, in professional handbooks and media coverage about a topic), can be seen as one mode of normative framing for new occurrences (see discussion in Hirsch 1986:802). In Healy's work the prescriptive elements in Accounts from respected sources set up such credence that distress was caused when disparities emerged between the matter in practice and the commonly published version - those people expected matters to occur as described in the 'Accounts' and for value to be attributed and acquired as set out. With the initiatives here, it is argued, the prescriptive elements in the formal Accounts of the clubs may have made it not so much distressing as difficult to conceptualise and publicly acknowledge divergences from those expectations.

### The main Account

The empirical evidence shows that overwhelmingly, the reports, evaluations and academic papers about the projects, in both style and contents, presented them as a manifestly successful and safe option: possible drawbacks or alternatives were dealt with cursorily or not at all. In general these publications had what Grabher (2002:259) refers to as an "harmonious tone" - talk of conflict and difficulties is absent<sup>1</sup>. This style of presentation deploying such optimistic and confident claims, backed by quantification can be interpreted as in line with a typical ecological modernist stance.

It is argued with reference to the printed materials and presentations, etc. produced by Envirowise, in its work to promote the clubs, which was supported by other evaluations and claims of intermediaries involved, that there was a common way of telling what occurred and what was likely to occur with the new clubs. The main Account about the club initiatives could be summarised as "Preventing waste by using the methods and approaches recommended here will assuredly save significant sums of money; reducing pollution." It was coupled with the further normative implication that the club projects were valuable to business and thus should continue and multiply, as a path to more sustainable business practices. This message made inroads on aligning green concerns with market concerns - or to be more precise, it allowed green concerns to fall within the purview of market concerns - to such an extent that in many cases they were omitted from claims about savings. Secondary evidence presented suggests that it became very influential, encouraging the creation of new clubs and being used in policy documents.

Yet there were further messages commonly linked to the primary Account, demonstrated in the empirical evidence presented here, which were not concerned with prevention. These messages supported privacy for firms not wanting to share their beneficial results, the cessation of support once grant funding for a project was over<sup>2</sup>, and changes based on reuse and recycling. Another significant aspect of the standard Account was the treatment of the process as in two parts; at first it entailed following certain practices by rote and there was then a second, discovery, phase, where the route to beneficial changes might be revealed almost like magic, for 'a fresh pair of eyes' was all

<sup>1</sup> (Of the reports obtained for this research, the University of Northumbria (O'Brien and Mowbray, 1999) was exceptional in publishing an additional report on the problems experienced during the project stemming from the methods and personnel deployed.

<sup>2</sup> Northampton was again an exception here.

that was needed - in other words expertise was not essential, nor was there a need to reward those blessed with perspicacity for their ideas. Further, the secondary evidence suggests that during the period studied, the main Account was not corrected in the light of new evidence to any great extent (as happened in the Netherlands following authoritative evaluations of initiatives there).

The power of this way of understanding the clubs and what they did and represented, was evidenced for me one morning while I was typing up a section concerning counterclaims alleging scam in the clubs. A Business Link exponent of the clubs telephoned; the enthusiasm, clarity and simplicity of what he was saying was so powerful that on reflecting back after the call, I found that while talking to him it had been impossible for me to think other than in the lines of his belief. I was not alone; it can be seen from the previous evaluations that some intermediaries, writing about what occurred, shaped what they wrote to fit the dominant Account, filling in 'gaps' to fit, despite the fact that the schema presented might be considerably astray of the available evidence. There was also at least one case where publications were edited so as to 'sculpt' the articles into the lines of suitable arguments with suitable names, treating the raw data as unsuitable. The evidence gathered also suggests that these processes were taken-for-granted responses to situations.

Envirowise and the Regulatory Agency were agents of government departments and thus likely to be accorded respect. Three mechanisms are raised here which may also have contributed to the lack of challenge of the Account. Hager (1995:57)<sup>3</sup> notes how established discursive practices can develop a 'disciplinary force' such that the way of speaking and framing in use will largely determine what is seen as valuable and persuasive evidence, and what as illegitimate to any discussion. Some matters will become invisible; conversely there is increased clarity and apparent certainty about what are considered 'good reasons' for action. The second process which may have been at work comes, surprisingly, from Arrow (1974:214-234 [reprinted 1984:167-184])<sup>4</sup>. He argues that since some information is very costly to find, once one channel of gathering information is used, it can be cheaper to keep using it than to deploy other channels. In particular, some information, such as that gathered in-house, or obtained from interest groups, will be very cheap, and 'pseudo information' such as PR, cheaper still. Once personnel within an organization are given the task of gathering information in a certain way, it will be in their interests to see that it continues to be used. Costs of scrutinising and checking need not be incurred if the information is not challenged, and over time these communication channels become established, making the information, or 'pseudo information' still cheaper, the process only ending when standardisation reduces information needs to a more manageable form. Linking this to the Hager point, in this way, if a discursive practice helped to determine the system for information gathering and acceptability in the past, its progeny can live on, invisibly influencing thought and decisions. (And of course, following Majone, (1989:47-49) once one moves from raw data, the very organization of the

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<sup>3</sup> speaking with reference to the construct of 'story-line'.

<sup>4</sup> In an argument explaining the tactics of investigating the costs of the firm's own negative externalities which cause pollution (the main paper concerns how matters reach agendas)

material [in Majone's terms, the created information and evidence] will be such as to support particular propositions.) Finally, where there is an erroneous belief that the information being given is 'neutral', the model of communication used may cast the anticipated target audience in the role of passive receivers, obviating the need to set up channels for the information to be challenged, and resulting, in situations of power, in no (overt) significant dialogue about the quality of the data. (An adaptation of the argument concerning incineration siting by Katz and Miller in Herndl and Brown 1996).

I surmise that lack of challenge to this way of viewing the club activities contributed to a general easing off of precision in subsequent writing and presentations, and iteratively, and because many were partnership projects, the freedom provided by the 'magic' aspects of the Account, and the lack of explicit, required mechanisms for gathering evidence (which might have led to careful observations) led to other aspirations for what the process might create. Thus they might - for if one thing was possible so easily, so might be others - make real contributions to reductions in unemployment, or to the amelioration of social problems etc., and these claims were made, happily meeting other, wider concerns of grant-providers. Yet there is evidence that the static and unchanging nature of what was being presented began to create problems. Organizations contributing to the initiatives such as the Environment Agency began to question whether further repetition was necessary.

The disparity between the dominant Account and some of the experiences within initiatives may have contributed to the probability that the majority<sup>5</sup> of clubs did not produce reports - it is not known why they did not do so but it is plausible that, if such easy 'wins' were not forthcoming it may have been perceived that their experience was at fault. It also bred cynicism in some of the intermediaries engaged on projects which did not work - to repeat the remark from the March consultant in the first case study:

"Whether those savings that were outlined in the reports ever happened, I have my serious doubts."

It is to these alternate perceptions that the argument now turns. This is sensitive evidence which does not exhibit reliability and is set out in a separate section, in the form of 'Counter Accounts', or counterclaims.

#### The Counterclaims recorded

This research was undertaken by someone who was known to many of the parties, and had a reputation, at the time, for not, as it were, being deterred by parapets. Because of this, and my conversational style, many people trusted me and a good number of matters were relayed to me where people wanted action. During the period I was involved with the club projects, no less than 7 intermediaries made me aware of their concerns that in some cases the outcomes were not as

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<sup>5</sup> presumed, as the total number is unknown

presented. Some of the early allegations I discounted because I had a fixed belief that the matter revolved around accounting practices and slack within the particular firms involved, and so, regrettably, did not take a good note<sup>6</sup>. These claims challenging the dominant Account, have been set out, also, in terms of that construct, giving additional facets of the way matters were explained and understood. These claims are reported as different ways of viewing what occurred rather than as statements of fact, as reflecting contentious constructions of how the initiatives ran, as perceived by some intermediaries. Again, what is presented can be seen as both rational and as expressing commonly held value systems about what *should* occur<sup>7</sup>. Because it would be easy to track comments to their source by cross-checking the dates of the interviews with the list in the Appendix, the only designation is the position of the speaker.

The contentious 'Account' is summarised as follows: "The system allows consultants to benefit by setting up short term initiatives to gain grants; they present outcomes as successful, beneficial and relatively effortless for firms. Because there is poor checking on claims and because of the arrangements to make payments, these claims need not be accurate." This is exemplified by statements such as:

".. there is a lot of pressure to bend the truth and reinterpret things; you make something up which is a failure, but you dress it up so it comes out as one of the deliverables." (ex-university consultant)

It was generally coupled with the normative implication that someone, undefined, should step in and stop this, and that it represented the betrayal of measures to promote sustainability to private profit. Further counterclaims were that numbers of these intermediaries setting up clubs were new to areas of deprivation (where most grants were available) and comparatively inexperienced in the field of waste reduction; yet they could merely follow the approach presented by Envirowise, using the many free Envirowise materials, attributing any failures to the individual firms concerned, before moving on to a new mode of gaining lucrative grants.

Other comments concerned the ephemerality of deemed interest in some cases:

"There are numerous examples where money acquired for one purpose was used to do something else, and when that money dries up... they just go on to something else. If you compiled a group of individuals who were actively involved in waste minimisation

<sup>6</sup> There were, I believe, a number of reasons for this. First, I attributed the allegations in part to that antibusiness bias common in people deeply concerned about pollution who did not have to earn a living from profit. Besides, regulators, after years of hearing lurid accounts which turn out to be quite different on site, do tend to respond to posited information politely yet be wary of giving them credence before seeing hard evidence. Also, and I think this is key, in my cloud of research papers and reading lists, I nurtured my current set of uncertainties with the notion that I was being 'scientific' - I was sure I would (eventually) discover something of value to do with the relationship between cost savings from pollution prevention and resource productivity. The stories of scam/bricolage did not fit with this at all. Meanwhile I read club reports assiduously and made lists of comparisons of savings of different types and amounts. Later, the voices expressing concern grew louder. When a senior consultant of considerable standing travels, of their own volition, nearly 80 miles to one's office to give a full account of their misgivings at what they had witnessed and clearly places faith in the consequences of the researcher's understanding them, it is impossible not to listen with grave, and slightly horrified, attention. I began both to take the concerns seriously and to relay them to those I thought would listen. However, it seemed that they, too, were enveloped in their benign ecological modernist clouds.)

<sup>7</sup> (and in fact, the presentation of two rival, but both rationally-based Accounts, is interesting in regard to notions of rational choice)

clubs a few years ago, I would say very few would still be working on it today."(University professor)

Yet, unlike the main 'Account', there were no factors inhibiting variants. A third 'Account' was detected in parts of the regulatory agency, to the effect that "These projects have already proved what they set out to do; they are a diversion of resources away from the main task of this organization which is to use formal regulation." This was supported by further observations about the way the projects ran, implying that duties concerning statutory regulation, for which the organization was paid insufficiently in any case, comprised a more effective mode of environmental protection.

The matters reported as constituting particularly bad practice varied. Some of the counter-claimants were most exercised about elements facilitating continuity (or not): Because grant payments were often in blocks, the system enabled some consultants, on the strength of evidence they provided about an earlier initiative, to bid for and receive another upfront payment, without necessarily having completed the first task to any level of competence (claim by community association representative).<sup>8</sup> Other informants highlighted cases where local sponsors wished to appear to be supporting initiatives at the top of the waste hierarchy when in practice they were financially committed to steady continuance of current methods of waste disposal. Another counterclaim concerned underhand competition between different advisory organizations: one respected and well-known professional in the recycling world related how his report to his own local council arguing for a local initiative on waste minimisation was, somehow, passed to a consultancy from outside the area, which then used the document to pitch for funds from a government department, and was eventually assigned the management of the sought-for project.

Other counterclaims made reference to alleged major dissatisfactions by the departments concerned. One specific claim was that the involvement of outside consultants did not necessarily add value:

"Between you and me, you appreciate there are different types of waste min. the kind you or I might do for them, with reports, etc., and the kind they do themselves, and look under the stones, which is much more valuable... you want people to do things themselves." (Consultant<sup>9</sup>)

Another consultant had been employed to write an overview evaluation report concerning the club projects for an organization associated with the government and was concerned that that they had not wanted to hear the results of the research, (concerning lack of effectiveness) preferring instead to have their own preconceptions validated.

"You are still dealing with essentially civil service mentality and recommendations that don't fit will not go down well..."

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<sup>8</sup> Another way of viewing - not really an Account - concerned a widespread practice within government and grant programmes generally of preferring to support new initiatives, and for a maximum of 3 years. This, it was alleged by a senior consultant, acted as a hidden subsidy towards ineffective innovations, for if the project was successful it stood absolutely no chance of further funding. If, however, it did poorly, it could be rejigged and represented as a new attempt to achieve the earlier objective in a different way.

<sup>9</sup> It was not possible to contact this consultant when collating the thesis to confirm this statement .

There were, however, hints that these counterclaims, were, in their turn influenced by the standard Account, which some 'counter-claimants' felt was the one that should be promulgated, generally using the argument that to reveal 'green scam' would confuse and put off firms:

"I am really sorry that I am criticising this thing... but you have got to be honest... it was a real torment for me because of F [another set of projects s/he was involved with] .. it would look bad on F ... it could pull the whole thing... I actually suggested to the Councils that in fact they should be taken off the books and replaced... it is not the project that is the problem, ..it is the people running it... because I am all behind any waste minimisation effort because I have found it extremely hard .. you know how hard it is, you are up against laziness and human nature..." (Community organization representative).

The narrators of these counterclaims alleging scam in various forms were aware that it would not benefit their careers to voice concerns. They recognised this was not high scandal; these were small matters, involving relatively small amounts, yet still, some showed concern that they coloured the published results with a certain quality of concoction which went against the established normative standards they had used for years. We can see the turmoil some felt over the issue. This contrasts with the clear confidence of those who found the standard Account conformed to their experience (and for practitioners skilled in recognising slack and implementing measures against it, this would be self-reinforcing).

### **Discussion**

This section of the chapter has reflected on the argument that those responsible for the initiatives presented an 'Account' of what should and did happen in them and their consequences, and that this helped to shape what occurred and what was recorded about those occurrences, as initiative succeeded initiative. The argument suggested that the main 'Account' also spawned conflicting ways of explaining as disparities arose between matters witnessed and the standard 'Account'. These counter claims were only voiced in certain circumstances where the audience was considered receptive; where there were attempts to link them to the formal 'Account', (as with the Northumbrian secondary report) they were largely ignored.

There is a kind of iterative reflexivity about the notion of Accounts, which has an ethical element. Actors present an Account of a matter both in the light of their own conception of what is taken-for-granted as rational and what they come to believe, in the light of feedback, will be understood and accepted by other parties to whom the Account is presented. The construct of 'Accounts', therefore, presents certain advantages over rival constructs, such as discourse, for researchers, as it requires neither evidence of (even notional) common arguments or conversations raising the differing matters, nor assertions comprising a narrative, yet carries with it means of exposing normative expectations held by actors and their ethical constructions concerning what should occur. This is particularly useful in situations where, as here, there might be a lack of clarity over the operative rules in a situation. Further, it directs attention to core elements of contention, enabling very

different ways of construing a matter to be presented by the researcher in a morally neutral way, without having to collapse down what is alleged to a possibly specious, 'reasonable' middle path. It was particularly useful here, where it would have been misleading to have ignored the allegations of scam but there was no means of assessing their veracity.

The use of 'Accounts' appear to have characteristics making them useful adjuncts to a variety of theoretical viewpoints. They can illuminate mechanisms of exhibiting (or hiding) contention to claims presented by new challengers (in the terms of McAdam et al 2001)<sup>10</sup>. Also, the creation and maintenance of a dominant 'Account' exemplifies nicely processes whereby institutional circumstances "suppress alternatives" (Clemens and Cook, 1999:459). Conversely, where 'Accounts' modify over time, they can assist understanding of the changes to ideas, and norms, as they pass to new locations (Czarniawska and Sevon, 1996; Rottenburg, 1996). There are further similarities in this way of considering culturally-constructed statements, with what Sahlin-Andersson (1996:70-1 - discussed further below), says of the ways "success stories" are retold, undergoing 'editing' relative to the circumstances and visions of the future being purveyed, in a process which incorporates elements of "social control, conformism and traditionalism." Sahlin-Andersson asserts new ideas for organizations arrive at new localities by mechanisms involving selective imitation, often carried out by consultancies (although she does not focus on their place in relation to fields, or other institutional processes), and act as a mechanism producing isomorphism. The notion of rival 'Accounts' can enrich this, displaying not merely conversion of new ideas to new purposes at new locations, but the rejection of such new thinking (Faison Hewlin, 2003), in ways which may be silent, stifled, (Brown and Coupland, 2005) or, as here, effectively private. Not all actors have sufficient social power to enter into a discourse with strongly differing ideas, their social skills may lead them to appear to concur, so that overt argumentative processes are rare (Poncelet 2002), nor need ways of thinking develop appreciably. The work of Healy and others is consistent with circumstances where few 'speak', matters harden and it is not so much that a discourse develops, as that particular ways of linking to the normative, and demonstrating adherence to a view, come to dominate. There are (not necessarily verbal) fashions in displaying affiliations. This is a significant variant form of contention: some claims are openly displayed, some are not: consider how difficult it would be for a researcher using a positivist methodology to accommodate such counterclaims - one or other must be discarded as 'of no account'.

Use of the construct has drawbacks, however. It does not necessarily assist understanding of how an Account came about, the spread of its range of influence, nor of the respect accorded it because of its origins. Nor does it necessarily reveal whether there is true commitment to an Account in the way, say, that Stinchcombe implied was the case with the old notion of institution (personal correspondence with Kieran Healy, 9 February 2006). Perhaps the weakest aspect is that, whilst

<sup>10</sup> Note how the use of 'Accounts' has the possibility to accord with the scenarios presented in McAdam et al. 2001, where intermediaries, as brokers, move to new situations with new ways of understanding issues which link to (new) conceptions of moral identity, offering those who become involved an ability to see themselves in new and distinct ethical aspects and drawing in people who were already part-committed to this ethic (and also giving rise to contention with those still adherent to old normative ways and groupings).

the strong, consistent, public Account exhibits the accepted view by powerful actors, the 'counters' to this consist here less of one Account than a complex of Accounts, with overlapping features, and not all may have been represented. Formal Accounts, however, remain, in either flexible or rigid forms, a part of the repertoire deployed by such projects, providing a means of demonstrating allegiances to the changes sought, linking to modes of effective (or not) oversight and feedback, and the countering Accounts can be considered linked to mechanisms, based on differing normative stances, for distancing actors from the effects of proffered changes, or the values and practices they imply.

For there is a further 'twist' to what was occurring regarding the evidence gathered here. Both those impelling and mobilising the dominant Account, and those countering it, were, from the evidence of the interviews, very much driven by their own personal ethical concerns to reduce pollution, and saw their actions as consistent with their ethical stance.<sup>11</sup> It can be argued that it was the perception of the best route to achieve reductions in pollution that divided the parties making claims or counterclaims and this in some cases reflected their previous work roles and experiences. All were motivated by 'personal passion'. To somewhat extend the remarks of Deborah Davis (2004:288-307) and Charles Tilly (1999:341) cited in Healy (2004:324)<sup>12</sup>, actions which appear to be dominated by narrowly rational and economic considerations actually appear to result from a judgement by the parties concerned against a moral framework that entwines the logic of ecological sustainability with the logics of the state and the market.

Having considered the ways that the 'folk' wrote and spoke about the initiatives, the next sections consider how their activities might be construed in terms of organizational fields.

### Construing intermediaries working on projects in terms of organizational fields

The research question for the second theme of this thesis asks:

**"To what extent does the use of the construct of 'organizational fields' assist in understanding activities in voluntarist, short-term initiatives?"**

Three possible ways are discussed in this section of the chapter. These are not presented as exclusive. One relates to the project form of organizing, one to field emergence, and one to newer work on fields, brokerage and translation.

#### (a) As part of an existing organizational field using projects

One simple way would be to see them as deliverers of projects, regarding the project as a distinctive service provided via a recognised way of organizing (see Anell and Wilson 2002:183; Blomquist and

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<sup>11</sup> (Being able to assess consistency of admitted actions with voiced aspirations is one good use of lengthy semi-structured interviews for such a topic).

<sup>12</sup> who made the remarks in relation to moralities based on logics of social relations

Soderholm 2002:25-38; Grabher, 2002a:205)<sup>13</sup>. Projects exhibit distinct ways of organising, with novel routines and ways of mobilising resources, whilst drawing on 'existing stocks' of knowledge and supporting structures (extrapolating from the discussion in Scott, 1998, :168-172; see also Sydow and Staber 2002: 216). They can be seen as entailing new time-limited modes of focusing 'exceptional efforts' (Grabher 2002:207)<sup>14</sup>, and monitoring that activity, whilst drawing on distinctive rhetorics of empowerment (see arguments in Hodgson, 2004:88). Here, crucially, they provide an exemplary mode of facilitating the entry of consultancy work into the decision-making of organizations. [In fact, although not crucial to the argument of this thesis, it could be argued that projects constitute a new organizational form, (see Rao (1998:912, who defines new forms, *inter alia*, as comprising 'new embodiments of goals, authority, technology and client markets' which both foster and demonstrate cultural changes and support and facilitate organizational diversity (see also Mullern 2002:207).]

Projects today are recognised ways of arranging work, employing many thousands of skilled personnel at any one time (see Ekstedt 2002:60-2). Raisen and Linde (2004:120) speak of 'projectification', where projects are seen as a standard response, a mode of solving new problems, often creatively. Following the lines of argument given by Fligstein (1996), those engaged on, setting up or reporting on initiatives, or working on related journals, etc. could be considered as an existing organizational field of practitioners making a living by deploying particular types of projects - in this case projects to demonstrate the beneficial aspects of greening initiatives of various kinds. There is a basis for viewing project activity in this way from a consideration of the literature. Projects are 'recognised areas of institutional life' with professionally recognised qualifications, standard modes of operation and evaluation, especial technical terms, a distinct literature with its own journals, regulatory roles (often via the 'project executive' and 'project manager'), suppliers (e.g. grant providers and initiating organizations) and consumers (client firms) (see Hodgson, 2004:85) Many parties involved in projects routinely move from one project to another as a significant, or total part of their working role, sometimes working for a single employer, sometimes working freelance, perhaps for consortia. To quote Powell:

"Work is more and more commonly organized around a team or work group charged with responsibility for a project." (2001:32)

If construed as an organizational field, this might be considered temporary as far as each project was concerned but would have, effectively, a permanent presence across industry.

Evidence presented here supports this construction. For example, the intermediaries' focus on networking, and ensuring individual projects were reported as successful can be seen as part of a necessary train of events (which was termed here the 'string of pearls') for obtaining future project grants and thus continuing in the same mode (of running projects - not necessarily continuing to focus on pollution prevention). Their focus on being seen to meet grant funders' requirements over

<sup>13</sup> A significant part of the current literature on projects outside Scandinavia relates to organizational learning, (sometimes referring to projects as boundary objects) and focuses on project management tools (see Bresnen et al, 2004, Sapsed and Salter, 2004), and the ways of thinking projects entail (see Hodgson 2004; 2005).

<sup>14</sup> Although see Anell and Wilson (2002:179) on 'boondoggling' - projects where funds and time are allotted but not much happens...

a 'track record' of projects, is clearly very sensible if they saw their core task as concerning the continuance of funding for partnership projects. It is less so if they saw the project they engaged with as, say, a jumping off point for engagement with businesses as consultants on pollution prevention.

The responses by some intermediaries made clear that some had been engaged in so many projects that they regarded them as the core train of events in their working lives, one succeeding another, and all involving the same elements of setting up partnerships, grant bids, compliance with funding terms so as to meet requirements, conforming to the stipulated running time, and then, in the last months, scouting for new partnership(s) and new project(s).

The prospect of gaining new grant funding was recognised as one of the main promptings towards intermediaries publishing reports of successful savings:

"If you want to demonstrate how effective your club has been, this is the way to do it and potentially it can lead to further funding because you are generating the interest from funding bodies because you are proving how effective it is if you can measure it."  
(from interview with Eleanor Morris of Envirowise 11.5.04)

Some intermediaries' work clearly followed a pattern: one successful project might lead to another, and another:

"... there was the EU project that we were taken on from, and out of that came Bedivel and out of that came Envirolink, and out of that came working with Envirowise and the DTI." (interview with Myles Greenhalgh about his time with Business Link, 23.6.04)

This way of viewing links to the findings in the first case study showing that the best practice project form of working set the frame for what could be done (Clemens, 1996). The most apparent form of regulation in operation was that concerned with the project form and securing stage payments of grant funds, whilst taking care not to disable the possibility of further grant funds from that or other sources (discussed further below). This helps to explain the sometimes symbolic oversight of expenditure, and the disproportionate efforts to spend allocated monies, buying matters such as window frames, whilst an innovative breakthrough, such as providing a commercial dishwasher for Spitalfields market-stall holders was mostly pursued by 'greens' from the Women's Environmental Network. Similarly, there were few resources devoted to dissemination of results, as might have been expected if the focus was creating a new commercial market. As the first case study club entered its final months, the university consultancy concerned, the London Environment Centre, began work immediately with another consultancy to run a subsequent club and within the year had embarked on a third major project this time linking waste minimisation and supply chain matters. The second case study club also set up systems to run further clubs, obtaining grants to do so, and succeeding in this several times.

W. W. Powell reminds us that jobs as we know them are creatures of history (for they did not emerge before the late nineteenth century), and that modern work increasingly entails projects

'coordinated by a process of iterated goal setting' (2001:32-3) with employees moving from one project to another, often combining this with moves from one employer to another. Powell posed the question: what novel problems of control are created by the project and its associated network form of working and what aspects of governance are associated with them? This research contributes to answering these questions: for example, the findings of the case studies and regarding the regulatory body show a disjunction between the control necessary for the running of the projects, and the control provided by the normal hierarchies of the organizations contributing staffing or assistance to the projects.<sup>15</sup> To view them as engaged in what was tantamount to an organizational field, based upon the organizational form of projects, could help to explain, in institutional terms, the distinctive logics and values in operation in this contention, for example of time-tabling, creating new projects, and reporting back to project-funders.

If considered in this way as a separate field, our expectations of beneficial longer-term results from such projects plummet. The implicit time limitations of projects provide little opportunity for difficult new practical matters to be understood and overcome. A single brief incursion by groups from outside the relevant field might leave little impression; claims regarding individual initiatives would be likely to be overtaken swiftly by further claims from competing projects. The normative and cognitive/cultural aspects of behaviour would be likely to be dominated either by the ways of operating of the project-culture itself (for those parties involved in running the initiatives) or by the pre-existing patterns of behaviour in the various established organizational fields of those presenting the ideas, not those of the firms targeted by the initiatives.

There are, however, objections to this construction of the matter. Field norms, systems and preoccupations do not quite apply. There are certainly distinctive norms around the organizational form of projects. It is now taken for granted, for example, that members of project teams be allocated special time away from their team-mates, to work with new people (in distinctive and non-routine ways) to solve new problems creatively (Raisen and Linde, 2004:120). Classifying this activity as the expression of the norms of a field does not satisfactorily explain this intimate carry-over into the practices of other organizational entities, and the 'dynamics of tensions' within projects of which Grabher writes (2002a:212). True, there was competition and jostling from overcrowding of the market, as some of the remarks quoted from the case studies testify, and it might be said that the teams from University College Northampton were the market leaders, but can we really designate this a field? The whole engagement with environmental grants of all kinds had probably been in existence for less than fifteen years. To use the terminology of fields would not help particularly with understanding the tact and translation between the different norms and practices of the different intermediary groupings concerned, seen so clearly in the approaches of the Business Link Advisers. A further difficulty is in defining the field precisely. Should it be described as solely involved in working on best practice projects, for example, or as relating to pollution

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<sup>15</sup> Sahlin-Andersson 2002:258 writes of project work exhibiting a 'temporary disembedding' so that 'earlier institutional patterns do not seem to apply'.

prevention, or 'greening' projects in general? There is a haziness about the service which such an entity might be providing. Some of the characteristics of an organizational field are recognisable; many are not.

The next section considers a second mode of construing these initiatives in terms of fields.

**(b) As ushering in an emerging field**

If the clubs had a widespread and enduring impact there would be a much larger market for advice on how to achieve better resource efficiency, placing experienced consultancies and other intermediaries expert in solving the new problems in a strong position. Thus it might be possible to consider the initiatives, even with their temporary nature, as the early stages of the emergence of a new organizational field, a service industry comprising firms of those advising on preventative methods to reduce harmful effluents by the introduction of resource efficient practices, and their major customers and other funding sources, regulators, trade newspapers, etc., which would vie with, and perhaps displace, parts of the pre-existing organizational field of those providing advice based around pollution control.

How does this concur with expectations in the literature, and to what extent is this construction supported by the empirical results here? There is a large, and growing literature on the emergence of new fields<sup>16</sup> and 'proto-institutions', creating expectations that the 'folk' would be engaged in both claims-making - sometimes called the 'rhetorics of legitimization' (Hensmans, 2003:358) - and mediation (Suchman, 2000), possibly acting as challengers to existing field arrangements. It also suggests that they might comprise a social form of institutional entrepreneurship, (Wang and Swanson 2003; Campbell 2004) which is not organised but grows from the many different actions of committed individuals, each of whom has their own perspective and potential to gain from the development, but where all must succeed for any to benefit. Contacts would be crucial for such agents to orientate themselves and form strategies. There might be a period of stepping beyond the usual normative behaviours (Wang and Swanson, 2003; De Jean, Gond and Leca 2004) before the formation of new regulatory modes and constitutive regulatory roles, and this might entail bricolage. Contestation might be expected from organizations already committed to previous modes, i.e. pollution control. (The literature review suggested that this might especially include organizations with regulatory aspects, committed to previous values and technologies and to linked conceptions of their appropriate roles and priorities.)

The empirical evidence presented supports this view to some extent. Envirowise worked hard to create a set of intermediaries prepared and ready to work on waste minimisation, using journals, seminars, lectures and telephone assistance to do so, and thus could be seen as intimately involved in the structuration of the emerging field. The instances of 'shape-shifting' by the intermediaries (noted informally), in which they moved between posts in this general 'field' also supports this way of seeing events. The characteristic language used repetitively in the main 'Account' and in the published papers, etc. about the clubs, as well as in the interviews recorded with 'folk', also

\* Some of it, it has to be said, rather stilted and unconvincing.

suggests that a distinctive discourse was developing, characteristic of a new line of work, with strong claims-making about its efficacy and using 'legitimising rhetoric', for example concerning the involvement of the regulator. There is also some evidence that the Envirowise team and others managing clubs did act as mediators, in the terms of Suchman, advising new intermediaries on ways of approaching problems, what to expect, how to go about gaining funding in the new situations they faced, what to avoid, etc. There is considerable evidence of the importance of networking for the intermediaries, and, not least from the 'counter Accounts' of bricolage to solve problems encountered. The experience of the regulatory agency exemplifies the contention experienced with those committed to prior schemas, systems of providing resources and ways of valuing work.

Taken as a whole, the evidence, however, suggests that overwhelmingly in the cases studied, more energy went into securing grants than in considering the development of assistance on pollution prevention as a strong future market. For example, there was concern in the second case study at firms getting assistance free, suggesting project-thinking dominated rationales. As a striking example of this, consider the paucity of evidence showing that the 'folk' were actively researching waste minimisation. I was personally shocked when visiting some 'market leaders' in the work to find that the only sources they made use of were the free handbooks from Envirowise. I later found that this was not uncommon; relatively few working on the initiatives had access to the American journals on pollution prevention, for example.<sup>17</sup> If a new service industry was developing, it did not seek to differentiate itself from other options, and re-use and recycling (as well as tidy waste management) were also promoted.

#### **(c) as commensals, operating in spaces between organizational fields**

If the first two possible ways of understanding them are not altogether satisfactory, can the intermediaries instead be conceptualised as operating between and amongst fields (whether established or emergent) using projects as a recognised and legitimised means of influencing developments?

The 'folk' were in a special position which seems anomalous when written up in the language of theories based on studies of formal organizations but it is a very common position today. They were a mixed group with loose affiliations to the fields they were attempting to influence, working on matters which were not the core competencies of their organizations, and were working with others outside their parent organizations to do so. Their work was structured to be short-term and temporary and it mattered, not only for their advancement, but for continuance of their employment in several cases, that they were able to show beneficial outcomes of this temporary work. Some had been hired specifically because they had expertise outside the normal range of work of their parent organization; others had calculatingly arranged matters so that they could gain expertise from the projects. These disparities in relation to the core competencies of their organizations created in some cases, as illustrated by the evidence regarding Business Link and one academic, some

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<sup>17</sup> Incidentally, this was a feature which may have added to the strength of the main 'Account'.

disjunction and tensions. Like many thousands now, for most of those folk interviewed, short term contracts (here, in the form of projects) were dominating their working lives. Viewing them as alongside, but not necessarily beneficial or detrimental to established and establishing fields has advantages. It fits their 'floating' characteristics; they can be seen as creating small disturbances, areas of uncertainty and contention, at the boundaries of fields, yet are held back by their own position, and their need to ensure successful reported outcomes.

This way of construing their activities seems to have more advantages than the options previously considered. If writing on some of the new forms of governance is considered (Murphy 1997; Crawford, 2003), it can be seen that some 'go-betweens' are in fact necessary to their operation. The work of the intermediaries studied here, if construed essentially as that of translation, links both to aspects of regulation (in shaping norms and practices) and to the current developing theoretical work on boundaries<sup>18</sup> and ways they may be spanned, some of which also introduces ideas of boundary objects, monsters, etc., extending to work on open systems.(For example, Blatter, 2003; Mullern 2002:209; Sapsed and Salter 2004; Joanne Martin (2002) in particular, provides an excellent discussion on the fluidity and permeability of many operative cultural boundaries.) Sahlin-Andersson in a recent book writes specifically about the necessary 'boundary work' entailed by projects, in order to set up and maintain the 'institutional demarcation' separating the activities within them from the normally obtaining rules, routines and norms - and thus creating a space permitting of 'new and changed procedures and relations' (2002:258). She writes that this 'work' is carried out in a low-key, discreet way, by those engaged with projects, such as project facilitators and project entrepreneurs, and that it is constituted by talk and statements - the unrolling and emerging of 'many intertwining interpretations (2002:259-60). These ongoing iterations on what norms apply continually maintain, yet allow shifts and revisions to, the social boundaries between the projects and the normative world outside. This notional 'space' for normative difference is created by 'ongoing interpretative activity'(2002:244) by the parties engaged in projects. It might be surmised that such ongoing rhetorical activity may not only span project boundaries but those of fields.

Much of the writing on alterations to fields seems to presume that somehow there will be some cutting across into established, and possibly powerful fields and a shaping process, altering networks in order to allow in new voices which can facilitate interventions and secure opportunities for the future. If we understand fields as areas of shared discourse, and societies as comprising "multiple overlapping and intersecting socio-spatial networks of power" (Clemens and Cook, 1999:458 citing Mann 1986:1), then there is a need - if new approaches are to travel - for some mechanism, some processes of translation in the terms of Czarniawska and Sevon, (1996), to cross the 'barriers' created by organizations wedded to deep-seated institutional practices. There are few mechanisms which can perform this task presented within the theory. It is asserted that this extra way of labelling actors in the scenarios of the institutional world of today would be a valuable shift

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<sup>18</sup> Much of this in the context of projects, focuses on aspects relating to organizational learning.

in the focus of research on the ways that institutional expectations and contexts rebound on our lives. People in temporary positions deserve a locus in institutional theory.

Second, by considering the precise positions of some of these temporary workers, (and it is appreciated that these are very exploratory ideas and the notions may need considerable refining) might allow greater understanding of the mechanisms of change and persistence. It is asserted that the theory has suffered by somewhat denuded conceptions of the '*dramatis personae*' who might effect change<sup>19</sup>. It has been suggested here that there has been over-reliance on the concept of a single institutional entrepreneur in this regard. In the cases studied here the 'folk' although studied in their temporary roles engendered by the grants and by policy and apparent openings, were still employed over the long term. They balanced, as it were, on the edges of their organizations, but still had a foothold. They were thus unlike the 'itinerant experts' written about by Barley and Kunda (2004:8). They still had some security of employment which may have acted, in fact, both to standardise their actions and to limit any entrepreneurial aspects to their activities. These particular arrangements for individuals and their actions reflect the particular institutional structures of the time and the repertoires that such positions facilitated.

### **Discussion**

The structural 'building blocks' of institutions are commonly presented in the form of two constructs: the organization and the organizational field. Presented in this way it is easy to think of organizational fields as ubiquitous and of any organized situation as subject to the relational and normative ties of at least one field. Yet this is not necessarily the case. As John Levi Martin points out "fields do not always exist." (2003:42). Nor do fields tessellate. These are essentially analytic constructions (DiMaggio 1983:148; Sahlin-Andersson 1996:73) and as such are considered relatively permanent entities with unclear boundaries, subject to change in both extent and characteristics: Scott (1994c:208) cites Hannan and Freeman (1989:57)

"the clarity of a set of boundaries is not a permanent property of a set of classifications.

Rather, the realism of distinction among forms depends on the degree of institutionalization that has occurred."

Clemens has suggested (1996:214) that the 'impetus for institutional change.....(is) most likely at the margins of elaborated and integrated institutional fields.' All this then, is consistent with the operation of rather different normative and relational systems between and at the edges of what are considered 'fields'.

If one posits that there are numbers of people working as intermediaries working between fields, routinely spanning the boundaries of organizations, engaged in short-term common tasks or in some mode translating ideas between them, there must be some expectation that these interventions have some effects on those fields. Perhaps their approaches to rules, whilst not necessarily working in

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(and maybe the stage-sets on which they can do it)

ways consonant with the dominant norms of a particular field, in some way facilitate sets of activities within those fields? They may, for example, detract from the efficiency of the activities within the fields, or improve this; they may in some way contribute to the stability of systems of fields vis-a-vis each other, facilitating these complex and diverse normatively-based entities. Another possibility is that they may add to the stock of ideas current within the relevant fields, possibly contributing to the dynamics of "contention, emulation and differentiation" within them, and thus to their diversity, which may then become "a critical source of transformative pressures." (Schneiberg and Clemens forthcoming:16 and 29-31)<sup>20</sup>. If they have such potential, then policy-induced projects and short-term interventions may possibly, when considered in terms of such scenarios, have in some ways characteristics comparable to those of some rather special organizational forms such as inspections, or laboratory experiments. These are social contrivances where stipulated routines are followed, which do not necessarily create change, but constitute a structured mode organized in the *expectation of change* and change is, as it were, parturient, yet where the causing of change is an expected occasional outcome, not a necessary corollary. They might be compared, in biological terms, to *apothecia*<sup>21</sup>, where there is a recognised, and fairly regularly occurring morphology but where the potential for creation of change is not necessarily realised. In terms of the intermediaries their potential to create change might link to their understanding of the field(s) concerned, and hence their skills in translation, the duration of the intervention, its provenance, etc. It is stressed that these are ideas, consistent with the findings here, but needing considerably more careful confirmation to be confidently used.

There is a subsidiary and rather different point to be made before turning to consider the findings in relation to voluntary regulation more generally. It arises from considering where fields operate and where they do not. Fields may be, as Fligstein (1998:7) maintains, sites of power struggles, contention and relational and normative turmoil over the shape of values and culture. Yet overwhelmingly, the studies read and others scanned for this thesis, have concerned fields relating to fairly major industries. The literature review asked the question, is it possible that rather like Weber's *stande*, the concept only really works for the dominant? if boundaries are unclear, or indistinct, (as they often are where actors cluster around systems of power), to what extent can fields be said to be extant in regard to lowlier, more transient ways of employment? Similarly, in a world where people in many occupational groups move jobs, not only within recognised groupings, but across them, as many managers (and cleaners) do, how does this influence the notion of distinctive value systems within such industries? Are some people not being counted? Is it possible that what is being defined as fields are areas of work where there is still significant professional power?

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<sup>20</sup> (who contrast this with diffusion)

<sup>21</sup> (a form of potential fruiting body in certain types of lichen, a commensal form of plant life.) It seems particularly appropriate here as its functioning is as yet poorly understood.

## Bricolage, projects, and the implications of the findings regarding voluntary regulation

"The wisdom of this aphorism impressed the proprietor, for he had already heard it several times in the course of the evening. He was, in fact, in the habit of always comparing what he heard or read with an already familiar canon, and felt his admiration aroused if he could detect no difference. This state of mind is by no means to be ignored, for, applied to political conversations, to the reading of newspapers, it forms public opinion and thereby makes possible the greatest events in history." (Proust, 1925, Vol 6:135)

What light has this thesis spread on the normative aspects of short-term arrangements such as projects, and on vaunted attempts by the state to change values and practices? This final section of the chapter considers first, if the findings here, expressed in terms from institutional theory, assist understanding of the attempted introduction of new voluntary rules to firms via short term projects, and then, ways the evidence presented might be relevant to the literature on voluntary regulation.

The paragraphs suggesting that intermediaries can be considered as 'commensal translators' omitted something significant, for to perform a function is not necessarily to do it well, and their was no assessment of their skills. This part of the chapter considers this and reflects back on the evidence of the intermediaries' activities in relation to norms, informal, formal and emerging, again arranging the material in terms of the themes of the thesis. It considers (in the terms of McAdam, Tarrow and Tilly 2001) first, relational aspects of the intermediaries' activities (in terms of their translation skills), then, more briefly, dynamic and cultural aspects, and the ways contention arose.

### Relational aspects

One way of construing regulation is to see it as a form of two way translation, with the regulator acting as go-between, and occupying the spaces between those in power and those regulated. In this construction it is a means of transferring both information and norms - shaping, checking, correcting, advising and educating, and maintaining alignment between the sources of societal power and the organizational field(s) of concern<sup>22</sup>. In this construction, intermediaries as translators may be seen as having similarities to regulators, using skills of translation to tactfully and deftly put across normative messages, for example from the state, or other source of power, and to reflect back explanations of the reception of those messages.

To translate well is to understand the norms and different ways of understanding on both sides, while producing a text which is sure-footed and confidant. It is argued that many of the intermediaries studied here did not do this well, and this related to their institutional positions, particularly their lack of knowledge of the fields which they were trying to convince, and that this was exacerbated by the claims made, particularly the use of the formal 'Account', which use was, at the same time, reinforced *because of* the uncertainty. As parties from different backgrounds they came to the club initiatives in situations where there were significant discrepancies in values (for example, between what have been called 'green idealists' and those tending more to ecological modernist stances), and some confusion of understandings about roles. In contrast, there was a

<sup>22</sup> (This approach might be regarded as particularly suitable for matters where enforcement systems are deemed inappropriate, or to assist in the introduction of rule-systems which are particularly complex.)

rather pert clarity evident about perception of the rules for some aspects of the projects. For example, the modes of success for obtaining grants would be well-known to many of the parties. These rules were understandable and manipulable, where other matters might be more obscure. It is argued that the main 'Account', offered by Envirowise acted in the same way. The clarity of the process to be applied, the mechanisms that it would call into play, and the results that would ensue could be presented as a certainty, when many other matters regarding 'greening of business' were much more problematic. Reliance on the main 'Account', with its simplicity and vaunted effectiveness, meant that it was quite pleasant to focus on and concomitantly blotted out the uncertainties around, freeing up, and making possible actions concurring with values which were very important to the intermediaries (as shown by the responses to the question on ethics in the semi-structured interviews). It is argued that this reliance on the main 'Account' replaced careful translation of the ideas of pollution prevention into the ways of thinking of the targeted firms for significant numbers of intermediaries - Business Link advisers and university outreach staff, both of whom had lengthy experience in dealing with firms, being clear exceptions here. For others, the clarity of the 'Account' further encouraged their insistence that it was reliable, especially as it concurred with the view of their own contacts and had the legitimacy of being supported by the state. They were in a challenging position, faced with many uncertainties, and the need to make the project 'work' in a short time. Also, the 'Account' did match needs and aspirations in some businesses, particularly large firms which were anxious to align with influential local networks, but not necessarily with the private judgements of managers of the many firms which did not pay for their waste to be taken away and who distrusted both the state and sales pitches from non-experts which did not address their priority needs.

Other parts of the evidence also suggest, as does Hines (2002), that some organizations actually participating in clubs were treated as passive recipients of advice; e.g. the voiced incomprehension at why firms were not more interested, and the remarks by some respondents in the follow-up of the case study that what was proffered did not meet actual needs. The secondary evidence presented here indicates that the factors necessary for the results to concur with the expectations were poorly specified - the recommended methods might produce good results (if a number of poorly defined factors held good), or they might not. Even by the 2004 national seminar on the initiatives there had been no great developments in understanding of these factors, beyond recognition of the importance of the personalities and skills of the organisers. Most of the focus had been, in any case, on matters internal to the initiatives in terms of providing financial savings for the firms involved, not on the factors causing firms to engage or not, and creating a long-term change in culture. The University of Northumberland caveats were not widely publicised and the numerous papers reporting success created a climate of expectation of such results. Those who had witnessed brilliant financial savings by participants were probably awed; those who did not may have been numbed and disappointed rather than enquiring, for the 'repertoire' provided by the projects seems to have provided no mechanism for discussing and exploring poor results in depth. It seems likely that such projects closed quietly or chose various means to fit at least some of their findings into the expectations in the main 'Account'. It is argued, therefore, that numbers of consultancies and other intermediaries

did not translate, so much as edit (Sahlin-Andersson, 1996) and edit for a (rather misleading) story of straightforward success which met the 'group expectations'.

Should we be surprised at this? As we move through different ways of speaking and thinking, we know, so quickly - or most of us do - those minuscule norms, those infinitesimal potential sharings which prompt us to realise what is wise to be omitted and what admitted to the micro-world of our contacts and conversations. We are group animals; for the most part we now how 'to do' isomorphism. If we wish, and if our livelihoods depend on it, as Proust's innkeeper exemplifies in the quotation at the head of this section, then the act of 'being the same' morphs simply and imperceptibly into the pleasure of 'being right and proper'. This occurrence is everyday. There is a significant literature on the ways that global trends and cultures affect numerous smaller fields, and this was, after all, or most of it, in a decade of spin. There is, too, a subtle way in which often-repeated theories and accompanying Accounts lead us all to expect their repetition, literally for 'that is what to expect' and we feel illegitimate, in some way, outside, if we demur<sup>23</sup>. During this period also, it could be argued there was established a more relaxed view towards what was the truth by many of those in established positions; the contrapuntal British and academic traditions of hard argument and heckling and rigorous debate gave way increasingly to more careful, delicate interpositions; we all learnt to be more solicitous of other people's prosperity, and our own (if we had it or aspired to it). When others were calm and accepting and the evidence presented was repeated so often, how churlish to 'pick flies'. To write to make something what it was not, or what it was nearly not, is a skill that everyone even in the middle ranks of a largish bureaucracy learns. And, indeed, one knows of theses written in this vein<sup>24</sup>, and large research projects. The anticipated conclusions sit ready, and the task is so often to match them.

This is an institutional explanation for evidence presented here. Another explanation, also based around rules, is to say that these state-supported initiatives were poorly regulated, despite formal management arrangements in the Departments concerned for oversight of the general Programme run by Envirowise. No powers had been given to Envirowise to gain information about the clubs, or to require certain standards to be maintained within them. The regulatory body, whilst given some duties concerning the prevention of pollution in its establishing Act, was not allocated resources for these tasks, and whilst it was consistently supportive in terms of outward statements, its engagement with the club initiatives was in fact vacillating, reflecting internal contention over resource allocations and strategy. The local project boards may, as in one of the case studies, have been uncertain of their role or seen it as to oversee faithful expenditure of the grant monies. The expectation was of success and that the process might be exploited by, or diminished by factors such as the lack of expertise of third parties, was not considered deeply. The intermediaries seem merely to have been considered, as those researched by Gilboy, as ciphers in achieving the positive

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<sup>23</sup> And, interestingly, this links to experience with games, for there are not only competitive games, but games of similarity (more often played by girls, it is true) such as skipping or 'Simon says', with their 'point' of excluding those who do not quickly act the same. Perhaps scenarios based on such games should also be a focus for research.

<sup>24</sup> I hope not this one.

targets sought. Yet not only were their technical skills very important in this role but they had the potential, in such a way of operating, to control what was reported back about voluntary regulatory initiatives if they were not adequately regulated themselves.

#### **Dynamic and Cultural aspects**

A further possible reason for poor 'translation' relates to the processual aspects of what was occurring<sup>25</sup>; this links as suggested above, both to the use of the project form and to the general norms and ways of understanding of the period. Regarding the work of the intermediaries, too, the 'project time' occurred as slabs, areas blocked out in their diaries - where there was an expectation of the way time would be organised, areas of certainty of activities before a new round of grant-finding, bid writing and getting together a new partnership. The project form is time limited, and as one of the university interviewees recalled about the initiatives, there was sometimes insufficient time to assist firms significantly, to understand their needs, rather than follow the lines of routine prescribed by the Envirowise booklets. The intermediaries did not have the security provided by a full-fledged government programme supporting a specific type of activity, as Di Maggio's art museum managers had had. They knew that the provision of grant resources was a subject of fashion and might not only cease, but might switch to other topics: the clubs, as Professor Phillips remarked, had a 'product life'. This transience militated against many practitioners developing long-term skills in aspects of resource efficiency.

In this uncertain world of 'change and tumult' (Powell 2001:11), some were uncertain even that their own contracts of employment would be maintained. Their activities were dominated by grants, and the behaviours expected of grant-funded projects. They were thus in a relatively weak position, and the 'swift trust' Grabher speaks of (2002a:212) as being accorded to some professionals, was unlikely to be donated. Over the years of this study networks built up and broke down, as did the market in projects, and to some extent norms regarding how such projects should be attempted, set up, reported and repeated, emerged. Ironically, the truth of the situations for all the intermediary "claims-makers" here was largely that their way of living was not sustainable. They were aware, often via their own parent organizations, of the insecurity of the funding resources for those engaged on proactive 'greening' work. The logic of what they were propounding conflicted with the logic of what they were - temporary marketing agents for a line of public policy that was uncertain and rather weakly supported.

And in the culture of the time, 'legitimacy' too was seen as a matter which might be acquired quickly - as the use of 'badging' shows. We like to be fashionable and this was a time (predominantly the late '90s), when fickleness was not much derided. This is an important point for a theoretical world that deploys, increasingly, the notion of legitimacy as an explanator. As Stinchcombe reminds us, (1997:17) legitimacy was previously used by the 'old' institutionalists to

<sup>25</sup> It is interesting that Sahlin-Andersson (1996), who writes of the ways that translation of ideas may take the form of 'editing', so that they are reformulated, both as impliedly comparative and emphasising success, follows Sevon (in the same volume) in seeing the processes by which organizations imitate others in fields as essentially dynamic.

imply rule following *out of respect* for the unique values demonstrated by the entity concerned; the rule observer respected the 'heart', the very 'innards' of the institution. He complains that with new institutionalist writing, the same terms are used, but they describe forms of behaviour without any implication of such a relationship to the institutions and the rules concerned. Much as Arrow (1984:167-184) pointed to the possible deployment of PR facts which were not necessarily accurate, by firms to save on their external costs, so Stinchcombe implies that adherences claimed do not necessarily reflect any authentic allegiance to the institutional practices being followed. Increasingly now, it can be argued, the forms are enough. Is it possible that the discussion brought out in Stinchcombe is less an observation of a theoretical shift by theorists, than one recognising a switch in public mood and a greater acceptability of calculative displays (Murphy, 1997, Crawford 2003; see also Newburn, 2001) as a way of ordering and producing apparently serviceable rules? If so, some of the literature, for example on emerging fields and 'proto institutions' may be misleading, for the central factors may relate to deliberate signification by those in some authority<sup>26</sup>.

The transience and ready acceptance of symbols as representing new norms discussed above, may link to another, regulative, factor, the use of bricolage by intermediaries (which is discussed more thoroughly below). Some of these instances can be seen as involving linking practices from different institutional settings, for example, the linking of marketing and PR practices with the systems requiring particular results within the projects; others were more akin to the writings of de Certeau, where staff in an organization quietly went on with their engagement with the clubs despite the formal rules, or where academics used the clubs to gain valuable experience. Slight tendencies in a number of people, and lack of a means of introducing higher standards<sup>27</sup>, led to a gentle inclination being repeated, becoming a mode of acting affecting, what one can only assume (without quantitative knowledge of the total) were a small number of the projects. It led to the editing of publications to fit wished for outcomes, and, in the case of the bicycles, the presentation of helpful PR for an organization as solely the charitable deed which it also was.

The research question for the third theme asked:

**"How can bricolage revealed regarding voluntary initiatives be construed and understood?"**

Two rather different meanings of bricolage were taken up in the literature review (pp. 67-8); one from the institutional literature, stressing re-use of pre-existing institutional elements to solve problems, and another stressing creation of a misleading appearance of conformity to rule, taken from the writings of De Certeau. It is argued that the evidence presented has shown a variety of parties engaging in different forms of bricolage to further the voluntary projects, and ideas of how such behaviour can best be understood are reviewed here.

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<sup>26</sup> Shearing and Wood, (2003:405) speak of new forms of governance "being directed by a multilayered world of sponsors and deliverers."

<sup>27</sup> Notions of professionalism were often not brought to the fore, associated with the turn, in many cases, to employ, either because of shortages or cheapness, people who could not be said to have had a professional training. Dobbin (2004:14) argues that this process has been exacerbated by the spread of managerial ideas (see also Cole, 1989).

Several examples were presented of the recombination of elements from different fields to solve problems; for example, the way the intermediaries at national level, short of resources, made use of the rather different established practices, resources and capacities at local level by drawing in further (local) intermediaries to engage with firms directly. Campbell links ideas of bricolage (as institutional recombination) to his understanding of the dynamic processes of evolutionary innovation. He shows how the usage helps us understand the means by which actors construct solutions to the problems they face, and - depending on our knowledge of the context - the process of their identification of those means. He points (1997:32, note 11, citing Rutherford 1994:95) to the similarities between this notion of bricolage and Veblen's processes of 'crossing and grafting.' Earlier it was suggested that some intermediaries might be seen as understanding the ways of more than one field and so be able to operate between, and at the boundaries of, fields. If such intermediaries take ideas from one institutional arena and use them to deal with the problems of another, then their deployment of this 'bricolage' may be seen as a resource, a significant potential facet for bringing about change (although other aspects causing this potential to be actualised would have to be specified much more carefully).

The second way of seeing bricolage considered it as describing wider, creative responses to systems of rules and norms, especially those of creating appearances and performances (ruses) which indicate conformity. Aspects of the evidence presented here, for example in the second case study, have clearly exhibited the "artisan-like inventiveness" of which De Certeau speaks (1984:xiv-xv) and which have been so interesting to discover and write about (presuming, here, that the surmises argued about them are correct)<sup>28</sup>. This way of understanding the term not only makes us more suspicious of intermediaries, but opens up a mechanism with much greater potential for more radical change in fields, for it may introduce novel new institutional developments. Significantly, where there exist people ostensibly following rules and norms (whilst not) - a fundamental regulatory problem - we have the elements, the precedents of mechanisms for conflict in institutional change, ready and waiting. Also, considering bricolage in this second sense creates further links to the voluntary regulatory literature, possibly providing a richer and more layered understanding which may contribute to the writings on compliance and slippage (e.g. Farber, 1999, Dimento, 1999).<sup>29</sup>

Yet helpful though the term bricolage may be in describing mechanisms and tactics, there are problems. The first is that its scope is limited; it cannot elucidate wider or more subtle observations. The evidence suggests there was, in the temporary situations of the clubs, a certain stepping back from the ready acknowledgement and use of the practices of rule. The intermediaries promoting, running and reporting on the projects used a range of approaches to solve problems which fought shy of deployment of certain sets of formal rules. This is not surprising, for their various institutional contexts, set out above, presented barriers, both to knowledge of practices and to challenge, and a

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<sup>28</sup> Although the responses were not those of the powerless, on whom de Certeau focused.

<sup>29</sup> Interestingly, admitting a certain falsity in responses links to Stinchcombe's concerns about current uses of the term legitimacy, where those involved do not enter into the spirit of the new institutional arrangements. De Certeau speaks of the 'fiction of legitimacy' (1984:177) where the verb 'believe' typically describes not a pressing affiliation and orientation but merely a moveable investment in a set of propositions, so that one sees the "simulacra of credibility" (p. 177) rather than the effects of straightforward belief.

climate where regulation was seen as inappropriate. The evidence presented suggests that the involvement of regulators, for example, was predicated on the assumption that they would not act in a regulatory fashion, and in fact there was some ill-feeling by intermediaries, and the matter was kept quiet, when a major turkey processor participating in one of the clubs was subject to investigation concerning pollution. Having obtained a large grant, it would be brave to go back to the grant-givers and report that the process, presented as a certainty, had been found lacking and that firms involved were indeed 'beyond compliance'. The intermediaries had a considerable task as it was, in holding together the project process in situations where there were tenuous networks of diverse partners and participants. It was only in circumstances where there was formal reliance on skilled, and professional collection of evidence, as when measures were authenticated by Cranfield<sup>30</sup>, that there was an effective mode of regulation on what was claimed. Despite the formal involvement of state departments, and their having set up careful schemes of management and evaluation of their contract, and the good auspices of ETBPP/Envirowise, this did not serve to regulate effectively what occurred in some of the clubs - reflecting their diverse origins, modes and the local variabilities.

The evidence has indicated more widely that the norms in operation in the projects were, in some cases, far from the old style norms of established regulatory professions such as environmental health. Far more profound institutional changes seem afoot, as observed by authors such as Crawford (2003, discussed above), who notes the rise of contract governance premised on prevention, with its concomitant avoidance of discourses around morality, and a predominantly instrumentalist mentality. Similarly the changed regulatory landscape calls to mind the lines of argument by Murphy (1997), also highlighted in the literature review, about new systems of social ordering based on dispersed matrices of government, where there is considerable reliance on 'budgetary languages of calculation' which deploy numerical data as a procedural and persuasive device, and where there may be manipulation of systems of communication so that in such orderings ethical criteria are less important and the old reliance on shared and more settled understandings, and the traditional reliance on the legal precision of the operation of rules are increasingly displaced. Satisfactory explanations for this must go beyond mere mechanisms of response such as bricolage. .

The term bricolage has also been used in a third fashion. Garud and Karnoe (2003:278) use it in a study of technological innovation to characterise an incremental approach deployed in Denmark<sup>31</sup> . They describe it as that kind of "resourcefulness and improvisation on the part of involved actors" with materials and ideas to hand such that, even if each creates only incremental change, such varied instances happening processually at numerous interaction points in situations of complex dynamics may assist in the unravelling of substantial problems. This approach, close to that of Campbell in focusing on pre-existing institutional circumstances and the ways actors construct solutions to their

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<sup>30</sup> [note that the powers for Envirowise post 2005 are considerably stronger].

<sup>31</sup> They contrast this with the US approach which was based on the expectation of important breakthroughs occurring. Interestingly, here, they reiterate in the paper that they support the view that technology entrepreneurship for innovation is not dependent on specific individuals but 'builds upon the efforts of many' (p. 277) who resourcefully improvise, so that 'agency is distributed across actors' (p. 280) and the bricolage in Denmark "was characterised by emergent co-shaping." (p. 284) by the many designers, researchers and producers involved.

problems, whilst also stressing creativity, seems a middle ground between the approach focused on recombination, and the broader - and more gleeful and irresponsible - usage of de Certeau. It also provides a processual and incrementally dynamic view of (evolutionary institutional) change processes, which is significant here, given the aim of seeking dynamic, cultural and relational aspects of what occurred (McAdam, Tarrow and Tilly 2001). It seems difficult to separate these three meanings logically, not least because what is pre-existing depends on the extent of one's knowledge of the institutional past. Many examples from the empirical chapters here could - depending on the depth of evidence - be described under more than one meaning of the term: for example, the donation of bicycles; the continuation of proactive work from previous authorities by regulators; the incremental establishment of large networks of contacts needed to provide potential new members for projects. Recognising its limitations but given these three overlapping uses of the term, it is argued that bricolage should be regarded as a spectrum of tactics or improvisations, coming into play where established institutional ways of operating are perceived as unsatisfactory or restricting. These responses, which may be immediate or incremental, covert or overt, involve using materials or ideas readily to hand, some of them from other institutional settings, and may contribute, as their effects build, to institutional change. This way of construing the term is much less 'neat' in theoretic terms than that of Campbell but it may obviate some of the contrived 'backward searches' for the causes of field change that one sees in some of the literature.

This section has argued that bricolage should be regarded as a spectrum of activity, its occurrence here linked to the temporary nature of the initiatives, and to the unclear regulatory systems in operation concerning the voluntary partnership projects.

The final part of this section considers first contention and then voluntary regulation.

#### The arising of contention

The evidence here has suggested that the introduction of voluntary regulatory systems in situations of considerable heterogeneity is associated with considerable contention, some of it masked or otherwise not apparent to the casual observer. It was observed within the regulatory agency, in the experiences of some individual intermediaries with their employers, and some of the contention felt prompted the (sometimes bitterly held) 'counter Accounts' recorded.

Yet the voluntary regulatory literature, largely innocent of the complexity that comes with institutional understandings, is almost devoid of accounts of any contention. The writings exhibit, (to this observer) an impersonal, steady optimism, a concerned breeziness which ousts contention and disagreements from their texts, transposing them to 'difficulties'. It is accepted that voluntary approaches are extraordinarily variable (Webb and Morrison 1999:230) and to explore them in institutional terms has been to expose deep fracture lines between normative stances. In practical terms, surely some reframing of the organizational forms involved in introducing voluntary regulatory initiatives is wise (Clemens and Cook, 1999) so that ideas of voluntary regulation become more linked to the ways that groups behave when their norms are contested?

Suddaby and Greenwood (2005:60) have suggested that institutions represent a 'truce'; if they do, they also represent the cessation of contention or its masking in some way. This has been a thesis exploring a 'regulatory space' - that mix of actors and interests that together act to constitute a regulatory system (Hancher and Moran, 1989) - which was complex, temporary and where norms were mixed and those of some of the parties poorly understood and regulated. It has been argued that this reflected the marginal position and relationship of the intermediaries organizing these activities to the major organizational fields concerned. If fields are areas where the level of institutionalization is such that there are accepted normative behaviours and steady regulation of those norms, it is in less settled areas of practice where contention is to be expected. Regulation, stretching between practices, and aiming to confirm and spread deemed good practice, has clear connections with contention. Nor is this necessarily negative. If one accepts a constant but subtle shifting and realigning and amalgamation of norms and practices in industry groupings (and probably other groupings too), some of which suddenly take off and produce radical changes, the introduction of these norms in such circumstances may be beneficial but may, initially, touch off considerable resentment and contention. (It is to be remembered that the old institutionalist Ross (1969[1901]) considered resentment one of the touchstones of social behaviour.)

If we think of fields 'as federated or multi-community systems' with concomitant 'multiple, competing and even contradictory logics' as posited by Schneiberg and Clemens (forthcoming:17)<sup>32</sup>, then contention is to be expected<sup>33</sup>. The argument now turns to more practical issues relating to voluntary regulation, which arise in the light of the evidence here.

#### Findings potentially relevant to the literature on voluntary regulation

This thesis, however, is not merely about institutional theory but about voluntary regulation. Its focus, the resource efficiency clubs, comprise examples of what have been called 'next generation environmental regulation', a range of measures deployed to overcome perceived problems of traditional regulation, including its high cost. Gunningham and Sinclair (2002) in their influential book on this topic review five different frameworks for categorising and understanding these new, developing forms for shaping behaviour, summarising what is known about them and their usefulness. This section revisits some of these categorisations in reviewing the empirical results obtained here to answer the penultimate overview research question, and returns to consider Jacobsson and Sahlin-Andersson's new scenario concerning 'soft regulation' (2006).

The clubs' aims - to encourage firms to put in place their own new rules and required behaviours to deal better with matters concerning resources - can be categorised as almost a classic case of of implementing 'self-regulation' and of attempted proceduralisation. Yet viewing them in this way

<sup>32</sup> in reviewing some lines of research on field change

<sup>33</sup> This, and their dynamic and temporary nature was underlined in a telling point from Hirsch and Lounsbury, who observed in 1997 that changing US state politics made continued funding support for the art museums' organizational field delineated by DiMaggio highly problematic. (1997:416).

does not explain their lack of influence on business practice, and provides only an inadequate schema to investigate this. It was necessary to consider the much wider conceptions of norms and routines provided by institutional theory to begin to grasp the range of difficulties the projects faced in seeking to change practices. The voluntary regulatory literature now recognises that there has been an expansion of 'regulatory space' whereby third parties such as insurance companies, trade organizations and NGOs are increasingly considered as taking on roles as 'surrogate regulators'. Yet there is not yet acknowledgement that these parties may be joined by consultancies and other intermediaries engaged in grant-funded projects, who may, linked to their requirement to attend to the grant funders, significantly shape behaviours and outcomes of the projects. Similarly, whilst the departments of state can be considered as following an approach of 'steering not rowing', here, the state passed most responsibilities to a consultancy, and the facilitation role itself was passed to further intermediaries. Thus outcomes depended both on the institutional setting of these intermediaries and their skills, in translating, in gathering contacts, in entrepreneurship abilities and, given the levels of supervision and regulation, their own normative standards about appropriate actions.

Similarly, the assumptions in influential parts of the literature about environmental partnerships presume that the alliances are essentially between government, NGOs and industry, and that within them adversarialism results later in improved co-operation, benefiting all parties. The findings here from the case studies, however, indicate that such arrangements may be dominated by consultancies specialising in facilitating partnerships and in fact bound by promises to grant providers, especially in regard to their 'boundary work' in defining both the role and the norms of the projects. Similarly, the co-operation observed here was of those from similar institutional backgrounds, within their 'comfort zone'; and in many decisions they were led by the managing consultants (echoing Poncelet 2002); these comfortable relations did not extend to the thorny local environmentalists upset about the use of 'spin', e.g. regarding ethnic minorities and incinerators.

Mol and others taking an ecological modernist approach, recommend that the state should not only stimulate self-regulation within industry but should focus on prevention and participatory, decentralised decision-making yet the institutional circumstances which would make this effective are not clearly specified. The clubs' exemplified such an ideal ecological modernisation approach but the decentralised decision-making observed here was associated with

- (a) poor regulation of voluntary regulation, associated with unclear lines of command and responsibility
- (b) circumstances in which the influence of the managing consultants, in particular, was crucial to the management of the Board and to reported outcomes.

Again, the effectiveness of this depended on the normative values of the consultancies involved, for in at least some instances what was declared as 'win win' either was not the case or was not owing to the intervention, and in many instances matters were not measured in an accountable way. Such arrangements, without further specification, were also associated with considerable social waste and confusion at local level, where an oversupply of public and private consultancies relative to the

work available, and a great variety of grant fundings, led to reported confusion by business about what was being offered and by whom.

Nor does the literature on voluntary regulation signal that such initiatives may be threatening to some inured institutional practices. The research has shown that for the state regulator, the practice of giving proactive advice, except as an incidental part of its more usual role, was perceived as very threatening by some parts of the regulatory hierarchy who saw their task as providing a service based on traditional forms of control [and this can be seen, as noted above, as concurring with the ideas of Stigler (1988), suggesting that regulators perceive their essential role as relating to their accustomed regulatees]. Finally, evidence from intermediaries showed that many of those to whom the club initiatives were targeted, did not, in fact comply with the law and pay for their rubbish to be taken away; this removed much of their motivation for engaging with the club initiatives, and, where there was little or no perceived regulatory threat, even with the formal backing of the state, voluntary regulatory initiatives were commonly ineffective in attracting participants. Much of the voluntary regulatory literature is predicated on the notion of 'going beyond' compliance, not that it may have to be built in circumstances of widespread, institutionally accepted 'slippage,' and the commonly used modes of evaluation of voluntary initiatives would not necessarily discover this.

The conceptualisation of 'soft regulation' by Jacobsson and Sahlin-Andersson (2006) seems much closer to the evidence of the 'best practice' initiatives presented here. Although deriving from studies of voluntary regulation at an international level, where maintenance of prestige is likely to have been a considerable factor, the descriptions concur with several aspects found in the clubs: the general *floopiness* of the improvements in operative standards expected of individual firms, the rhetoric which implies that 'all good people' would want to join, and the reliance on (generally unspecified) technical expertise as the root reason for respecting the recommended methods of change. They also note a concurrent spreading and loosening of regulatory roles and the acceptance of self-assertions by participants as to their compliance with the adopted new rules and its significance. Yet even here there are few observations concerning contention: the term 'regulatory constellations' itself, implying a certain harmony and order.

### **Conclusions to the Chapter**

The intermediaries studied here worked with the temporary resources of grants, helping to create a transient public discourse (deployed in successive instalments of draft policy documents as new attempts were made to define waste policy). Formally based in one organization they were trying to influence others, in part by engaging further organizations in the task and in part by making the potential for change generally known. This chapter has used the evidence gathered in three different conceptualisations, each of which has relevance to the use of norms in institutional theory. The claims made were considered in terms of 'Accounts', suggesting that the dominant 'Account' reflected perceptions of norms in recipients, and in turn helped to shape opinion of what was

expected, thus shaping behaviours and often perceived experience. Contending evidence was presented as 'counter Accounts' suggesting that different ethical alignments may continue on, despite not being publicly voiced. Secondly, the evidence gathered about intermediaries was displayed by considering how they might be viewed in terms of the construct of organizational field. Three ways were considered: as predominantly affiliated to one set of norms (concerning projects); as compatible with working in the very early stages of a new field; as constituting, as commensals operating between fields, arrangements which have within them, the potential for significant change. The last part of the chapter considered how the evidence gathered contributed to understandings about voluntary regulation, both theoretically and in practice. This was drawn out by use of constructs and approach advocated in McAdam, Tarrow and Tilly 2001, exploring specifically relational, dynamic and cultural aspects of what occurred and the ways they might give rise to contention. All these elements reflect the tensions and uncertainties created where there are attempts by one group (here, the state), to influence other groups to take on new norms, using intermediaries - themselves already subject to a variety of norms and practices - to voice and achieve adherence to the new norms.

The final chapter reflects on the contribution provided by these conclusions towards answering the central research question concerning the value of the institutionalist approach.

## Chapter 9. Reflecting on the research approach and results

"Another thing," I opened up a new argumentative line, "I'm not sure I really need whatever you can tell me. If I have to get along without it, I think I can." (Dashiell Hammett [1929] 2003:35)

The main theme of this thesis has been that the roles of intermediaries in voluntary regulation have been near-invisible and that if taken into account, they furnish a new and less sanguine view of the nature of such initiatives, the need for them, and of the claims made about them. The institutional configurations supporting voluntary regulation in practice, as opposed to those supporting voluntary regulation as an idea, had not previously been examined carefully. The previous chapter, organised in terms of the main themes of the research, has set out the answers provided to the research questions and explored some of their interconnections. This concluding chapter reflects on how the main focus and theoretical approach emerged, considering, on the one hand, ways in which the research might be considered original, and on the other, possible limitations of the theory used, methodology and execution. Some specific ways in which the findings might prove relevant in policy terms are then set out. There is then a consideration of how, if the ideas suggested by the results are well-grounded, they might, in the round, cast a new (if pale) light on some theoretical constructs of interest, and so prove relevant to theory. The thesis ends with suggestions for further research which might build on these findings:

### The research problem and theoretical approach

As outlined in the first chapter, this is a study of best practice projects which set out to improve resource efficiency in firms. They were part of the Government's response to evidence and arguments calling for radical reduction of the throughput of materials and energy within modern economies to prevent or defer a clutch of vast global problems, including global warming and injustice in distribution of necessary resources. In the UK there was indecision over policy surrounding the issue - for it fell outside familiar notions of policy priorities and departmental divisions and most orderings of theoretical debate; there were small-scale responses. The main task of encouraging such changes across industry was outsourced to a trusted intermediary organization which, in turn, encouraged other intermediaries at local level to run the projects which form the focus of this thesis. These projects aimed to show how volunteer firms could, by adopting practices based around audit and observations of flows of materials, reduce their resource use per unit of output and so reduce their costs and also the pollutants they emitted. For government, this demonstration would also help with another long-accepted, and more comfortable aim, that of making firms more efficient.

The initiatives studied here ostensibly met many contemporaneous concerns about the direction of environmental policy (Chertow and Esty, 1997): they were a reaction to global changes and the need for ecological interdependence (often neglected); their focus was pollution prevention and they

allowed customised and cooperative responses by individual organizations to raise standards to levels which suited their circumstances, and the whole process could be seen as encouraging the diffusion of new approaches; the actions were taken at local level, involving local people and organizations and control was in effect decentralised. Yet various aspects about initiatives, as they developed, were difficult to understand. One problem was that there was little clarity about how the phenomenal results claimed were being obtained; there was also a contrast between the happiness evident in the statements from firms involved and the general lack of interest and uptake by industry generally. Earlier evaluations of the initiatives had focused on exploring how their ostensible benefits could be maximised, many using quantitative analyses on sets of results previously published in club reports.

Several theories applicable to regulatory aspects of economics were reviewed before a decision was made to focus on institutional theory. It was chosen because of the centrality of the operation of norms and rules within many versions of the theory, because of its ability to explain collective human behaviour which is not apparently rational, and because of the large literatures exploring both bringers of change and reluctance to change. It was, however, a somewhat curious choice in that the theory was to be used to analyse happenings regarding projects, seen as organizational forms operating over a characteristic, temporary period, with their own distinctive rule-systems. It is more usual for institutionalist research to consider structures and patterns which exist, or have existed, for many years. The projects to be examined, also, were not from a single, recognisable organizational field, but involved 'partners' from a variety of different organizations. The focus was to attempt to show the institutional factors, if any, driving those who ran the projects and reported about them, and the way those actors collectively wended a path between observing the enduring rules and norms of their parent organizations and the temporary rules of the project form (if this occurred). These settings were new, provisional and flexible and involved a mix of people from different institutional backgrounds but supported by departments of state, (ostensibly, if these activities are viewed in the light of institutional theory) attempting to create deliberate institutional change across numerous fields. It was considered that they were characteristic of many situations in working life today, where grant-funded short-term projects to introduce new systems are ubiquitous, not least in universities, and it is important that institutional theory addresses - or tries to address - these discontinuous ways of working involving skills and tact in switching between differing rule-systems, and simultaneous allegiances to different social groupings. Examining them using institutional constructs might reveal whether they do indeed foster the changes that they encourage - in Clemens' terms (1996:205-214), are they an effective organizational form? An interesting facet was that whilst the reports of the projects suggested harmonious and unproblematic progress, in the early interviews and observations there were undercurrents of contention mixed with great idealism.

The main focus of the study derived from some serendipitous initial results. Semi-structured interviews were used for the case studies. Anticipating, from the literature, that improved networking would be a benefit for the participating firms, a question on this was prepared and for consistency, presented to all interviewees. The participating firms did not report much increased networking but

steering group members did, and some were vigorous in their gratitude for it. There were further unanticipated replies in these early interviews: in one case some interviewees, also steering group members, made surprising allegations of scam.

It was after considering this evidence that the focus turned to the rafts of different intermediaries who worked on and ran the projects, their interrelations (construed in terms of organizational fields), their claims-making (construed in terms of 'Accounts'), their roles in relation to norm-changing and regulation, and how their temporary partnership projects might be understood in terms of institutional theory. Whilst they were core 'agents' in what occurred, influencing firms to change on the one hand and, on the other, influencing perceived outcomes about the project, it seemed they had been largely ignored in what was written about the initiatives. They were defined as those who initiated, worked on, and created or relayed reports about the projects. They formed intermediary layers between the initiating departments and the firms which might change. They came from a variety of types of organization, some from fields previously quite new to greening of industry; many were from consultancies, advice, or educational bodies of various kinds. At a national level the initiatives were suggested and introduced by an intermediary organization (a consultancy specialising in innovative ideas which also reported on some of the first projects), and then supported by intermediary agents of the state (one a regulator and one a private consultancy). At local level further intermediaries set up projects and managed and made claims about them. The formal national evaluations ordered about them were also entrusted to consultants (some of whom had previously worked on local initiatives). This pattern of deploying intermediaries occurred in a context where official policies on what should be done to reduce waste were fragmented, hesitant and unclear, where there was a plethora of organizations seeking work on the topic of greening of business, some public and most private. Very large numbers of projects on aspects of greening were being initiated at local level with a variety of grant-providers, and often encouraged by the government departments concerned; not all made headway. The series of intermediaries involved in claims-making about the club initiatives included the regulatory body, the national consultancy (which linked to an old government think-tank), national consultancies (typically with specialists in productivity and energy management), university consultancies (offshoots from a variety of specialisms), local consultancies set up to deal with greening of business and established business advisory bodies of various types.

The theoretic aim of this thesis has been to understand how these 'behind the scenes' issues of voluntary regulation might be conceptualised within institutionalist theory. The thesis has focused on the peak years of the projects, 1997-2001; 1997 was chosen as being the first year in which the regulatory body, (created in 1996), might be considered to be fully active; by 2001 there were changes operative in major grant regimes leading to a sharp decline in numbers of projects run.

This research is unusual in some respects. First, it focuses on intermediaries. Also, the projects appear to have had little impact, (although final long-term outcomes are still not known), so it is unusual in studying a voluntary regulatory intervention which is not necessarily successful, and because it is not, as is common with institutionalist studies, an 'after the fact' inquiry (where there is

always a slight suspicion that causative elements claimed might have been selected to fit known sequels). Also, this research examines, as it were, activities peripheral to major organizations, which involve actors from several different organizational fields. The focus of much recent institutionalist literature regarding the deliberate introduction of change has been on the targeted firm and its internal organization, or on a single field, and the ensuing changes to existing, established organizations and organizational groupings. Again, many current studies involve examining change over decades in one enduring field for which there are well-recorded historical data-sets<sup>1</sup> and where long-standing norms and practices can be seen as drawing respect. In this case not only were the projects themselves short-lived, but the system of grant-giving favoured the novel, so that the intermediaries, if they persisted in their involvement, were driven to present what they were doing as new and to recreate or refashion it in some way. In terms of voluntary regulation, there have been comparatively few studies examining the proactive roles of regulators, or considering 'best practice' projects (a fairly common approach in the UK), or using an institutionalist approach (and most of these have examined the emergence or development of a single field). Studies of the role of third parties in voluntary regulation<sup>2</sup> have rarely focused on their needs and constraints, or on the potential reflexive role of consultancies engaged also in academic or evaluative writing on the subject.

Also, conceptually, the research has attempted to focus preferentially on dynamic and relational activity, and on the development of contention, voiced or unvoiced, considering social interactions and relational processes in general as potentially 'active sites of creation and change', following McAdam, Tarrow and Tilly (2001:22-3)<sup>3</sup>. In line with this relational stance the thesis has avoided where possible the term 'the environment' as denoting an ostensibly objective entity and this is explained here as it relates closely to the theoretical basis of the thesis. The word 'environment,' historically, was a prepositional term and always a relational concept, reflecting a spatial entity around persons or places (O.E.D.) Within the thesis the view has been taken that environments relate, by definition and intrinsically, to social groups and to the social relations and practices that support power over resources and amenity, and so link to contention concerning these allocations. If environments are understood as varied, temporal and relational, it follows that some groups gain and others may become subservient as resources and effluents are created and move. As Coase has pointed out, we do not necessarily know costs until some time after decisions are made (Coase, 1938:118-133).<sup>4</sup> In the same way, we do not know the full effects of detrimental resource flows on habitués and their environments until some time has elapsed and it is possible to make estimates of the extent of the systems affected. In this view, to understand 'environmental' problems entails a history, a well-chosen narrative (Tilly 2005) exploring the ramifications of influences, which will involve, as

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<sup>1</sup> Recent work by Munir (2005) on the way that recorded events may be 'constructed' as significant from the stream of changes occurring where they have the potential to meet and fulfil narratives and to facilitate theorising, gives pause for thought on the 'reality' of such evidence of institutional change.

<sup>2</sup> generally of NGOs.

<sup>3</sup> see Chapter 4.

<sup>4</sup> My thanks to Prof. Michael Bromwich for this reference.

here, longitudinal and social researches into the benefits or detriments to particular groups from changes studied.

#### **Possible limitations of the theory used, practical approach and findings**

Institutionalist approaches have many advantages for a multidisciplinary thesis, especially one focusing on scenarios revolving around posited changes in rules. They explain cogently why people go along with things, act conventionally and persist in habit patterns. They provide deft explanations for slow and incremental change over time and for the persistence of apparently ineffectual forms and rituals. And yet, especially when used for modern governance, institutionalist approaches are, in a sense, very middle-aged. Worse, the staidness about the world often presented in many current studies, suggests a certain disingenuousness.

'New' institutionalist theory was being developed at a time when many old ways of thinking and doing were being swept aside - by rationalisations and reorganizations within industry, by relocations, innovations in thinking and in dealing with the material world, and by sets of measures often considered as ushering in globalisation. Individual institutions themselves have been subject to major changes whilst the theory has developed, ranging from the fairly rapid onset of enfeeblement (e.g. the western institution of marriage), to the abrupt and cathartic (e.g. the end of soviet communism). Millions of people have been driven from their traditional ways of life and from their lands across the world because of flooding, drought, soil erosion or deforestation<sup>5</sup>; long-established ways of life have been questioned and disrupted by acknowledged racial and religious turmoil in certain countries, and there have been huge changes in operative systems of morality. Bauman (2004:67) speaks of a 'watershed in modern history' dividing the years of post-war reconstruction and 'developmental optimism' and new realities creating a 'present day rendition of frontier-land conditions' (2004:88), with disorder, anxiety and an absolute illegitimacy (they are not wanted and their cultures have been destroyed) for those many thousands who are displaced and become in his terms, 'human waste'. And yet the new institutionalist writing, cogent as it is, tends to skirt this; much of it focuses on that faithful concept, the organization and its institutional features and even issues such as the rise in use of contractual labour are widely avoided<sup>6</sup>. In the UK of today individuals often belong to, and have loyalty for, individual organizations for comparatively short periods of time. They switch allegiances and employment rapidly. It is as if new institutionalist writing ignores this, and harks back to a time, perhaps wistfully, perhaps out of lack of awareness - when the institution and "the organization" provided both a way of life and a shield<sup>7</sup>. It is argued, therefore, that in some ways prevailing institutional assumptions and ways of choosing problems are 'inappropriate' to address current realities: they are slightly dated, as if a person was unwittingly dressing in clothes appropriate to

<sup>5</sup> The Red Cross estimated in 2003 that 58 per cent of the world's 43 million refugees were uprooted by environmental degradation, and these numbers are predicted to rise to 150 millions over the next 50 years as sea levels rise. (Environmental Health News, 2003:7).

<sup>6</sup> Indeed, many academic institutions now employ contract researchers and deploy their staff as consultants, as studied here, often based in quasi-separate research centres, to bring in grants.

<sup>7</sup> Perhaps this also relates to the institutional settings affecting the process of writing. Academics, too, may be subject to 'sunk capital' and if they have established a career in a topic, or collectively a field, may be minded to pursue it.

earlier decades. Of course, this thesis is not alone in addressing (newish) ways of organizing and systems of rule using the theory, so this critique may be unfair, merely reflecting a bias in the choice of reading, or a misunderstanding of theoretically important issues being explored by such literatures.

As regards the research approach, the limitations applicable to any use of ethnographic, qualitative methods are set out in Chapter 4; this part reviews possible limitations and problems specific to this piece of research. There was not access to all the factors of interest; sometimes permission could not be obtained; a couple of interviews were blocked; in other cases there were promises of interviews, repetitively deferred; sometimes the geographic location or institutional setting made it very difficult to observe certain features. A significant limitation was that it was impossible as a single researcher, observing a type of voluntary regulation that involved many partners, separate consultancies and numerous participant firms, to examine all relevant events and interview all significant actors, even in the case studies. Nor, because of underlying assumptions about the research relationship, was it possible in a number of situations to challenge claims vigorously. In particular it is a drawback of the research that no representatives from the group of private consultancies which specialised in working on clubs were formally interviewed. It was not possible to interview the lead consultants in either of the case studies and it is possible that their observations would have added considerably to the understanding of the initiatives. Other employees of major consultancies might have been interviewed but this would have presented sampling issues (Johnson, 1990:41-4) to ensure that those chosen represented some relevant units of analysis.

Ethical issues emerged early, for some intermediaries challenged the validity of some claims. This presented issues requiring both that their anonymity be preserved, and that their aspersions should not sully *bona fide* results. Given the lack of verifiable evidence on many points, the issue was dealt with in a way that aimed at preserving the tension and contention between the two types of claim, by regarding them both as constructed, rival 'Accounts'. An issue remains, however, for whilst this tactic makes the two sets of claims notionally equivalent, the two sets are not necessarily equally strong and the approach may well distort the balance of what was presented for it was difficult to evaluate the contentious evidence in terms of its strength, given that it was inherently not reliable. In terms of the claims made of beneficial results to firms, it is important to clarify that the thesis has never sought to deny that many individual firms made staggering changes that went far beyond 'good housekeeping' reductions in organizational slack, reducing both effluents and costs<sup>8</sup>. The concern, and so the argument, has been that such cases have been intermixed with others, less successful, and because of the use of the project form and the institutional position of the intermediaries using it, together with other factors, there were ineffective regulative means to extricate these others and draw effective assessments of the occurrences. In the usual way, all those interviewees quoted were given the opportunity to check the final draft concerning what is attributed to them. Where it has not been possible to trace interviewees to do this the fact that the statements have not been confirmed with them is stated and the quotations anonymised. All sensitive evidence which does not exhibit

<sup>8</sup> Thus, in line with Kapp's argument from 1976, suggesting it may be unwise to conceptualise effluents as capable of being modelled predominantly in terms of the operation of simple externalities.

reliability has been placed in a separate section and has also been anonymised.

Another problem for research aiming to focus on changing relations was that, whilst relationships could be observed in those aspects studied using participant observation, the semi-structured interview was not a good method for exploring relational aspects - it tended to provide a static, one-sided view. Another limitation was that the research was part-time and was then interrupted, so that the passage of time regrettably also made the findings less immediate and may have contributed to a situation where the evidence obtained in interviews was a reported memory of a settled matter, rather than contemporaneous observations about matters as they evolved.

### **Reflecting on the findings**

#### **Implications of the findings for policy**

The thesis has focused on the role of a particular type of third party in voluntary regulation and in so doing has developed a different approach to viewing voluntary regulation to that normally deployed. Whilst it is accepted that the case studies and regions chosen for study are not necessarily representative of experiences across the UK, a number of factors studied are thought to be applicable to wider debates. We now live in a world where the state, and other bodies, are continually trying to bring about changes across one or more organizational fields by the use of the project form (often attempting to demonstrate that voluntary change is beneficial). Increasingly, because of a commitment to outsourcing, and because it has become routine, the state is using intermediaries such as consultants to implement these attempts at change.

Dashiell Hammett reminds us that even in the investigation of murder, not all evidence need be used or wanted. Coupled with this, so often (at least in crime novels) what we see arrayed when we first seek to find out are convenient chimera, reflecting our initial conceptions, which are not in the main untruthful - though they fit with our preconceptions, but are in their combination beguilingly misleading. If the findings here are not themselves deceptive (which is of course a possibility, for they do not conform with the current prevailing concerns of institutionalist theory on the setting in train of change, rather suggesting mechanisms and parties where change is proffered and the symbols of change delivered, but not, on a larger scale, necessarily taking place), who might be helped by this alternate way of focusing on the practices deployed to inculcate voluntary rule adoption? If the 'folk' and their ways of acting and repeating actions are significant, then we would expect that in other areas, where similar arrangements are made to encourage voluntary changes, successes are likely to be disproportionately visible - for there are neither incentives, nor mechanisms, to scout out all failures. (The counter-claims here, for example, never reached all those making decisions at local level, let alone policy makers). Given this, two potential implications of the findings for policy are put forward:

1. Cox asserts that theory is always 'for someone' (1980:128); many of the intermediaries studied here benefited from ostensibly objective theories which effectively masked their roles. The evidence presented has demonstrated ways in which communications about voluntary regulatory initiatives can

be moulded by intermediaries<sup>9</sup> in situations where co-ordination and control of their activities is weak. This is important because it is likely that many of the new practices of policy associated with the shrinking state and contractual outsourcing depend on such 'folk'. The notion of folk is of creatures of projects and hence of the project grant and of temporary tasks. It is unlikely to be in their interests to report failure or to undertake research before receipt of grant to ensure the matters required are not already being undertaken. Several pieces of evidence presented here suggest that some intermediaries found it convenient to present changes as stemming from their involvement when it was possible that what was observed would have been happening in any case<sup>10</sup>. The evidence here has shown that the intermediaries engaged do not necessarily have expertise and experience in the areas in which they work, and has suggested that regulatory arrangements were weakened with the blurring of public and private responsibilities in the project arrangements. In other words, it has been argued that the 'regulation of voluntary regulation' can be unsatisfactory, providing insufficient control of claims made.

The thesis has argued that intermediaries, in running voluntarist projects, can be seen as operating at the margins, 'betwixt and between' established groupings, translating new ideas and messages between them and always seeking to maintain their own networking capability, for example by reporting pleasing results (see on such relationships to fields Schneiberg and Clemens 2004:36). Their position necessarily means that they lack stability (and their instability can be heightened by contention as where their role is not recognised by their main organization). They may possibly have brief experience with the fields in question. Their role is not easy for they are expected to work in short separate blocks of time in milieux of differing fields, with varying power arrangements, norms and expectations, and they may 'shape shift', taking on other tasks. Powell has called for "innovative responses to the fluidity of project-based work, arrangements possibly like guilds for independent contractors that provide opportunities for professional community and learning, as well as financial security."(2001:21) Such a development, especially one stressing the development of professional norms, would also provide greater drivers for accurate reporting in a field where the regulation of such roles is itself a skill.

Also, the essence of what was being reported by the intermediaries rested on improvements noted by carrying out audits of resources used in processes. Numerous questions have been raised about the increasing use of auditing as a means of verification, (mimicking, and thus being legitimated by, some of the routines of science), as a new form of control over substantive knowledge and the assumption of auditors as neutral parties who interpret data (e.g. Pentland 2000, Power 1999). This study suggests that in terms of 'green' audits at least, the institutional circumstances may further shape what comes to be understood, where the information provided by those reporting the auditing is further mediated by intermediaries.

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<sup>9</sup> (and those writing university theses)

<sup>10</sup> This does not include all, and there were, for example, careful arrangements in the work by Steve Waring for Envirowise to exclude this.

2. There is a second, more subtle implication which is related to the first. This thesis has argued very generally for a greater appreciation of institutional context, not only in relation to organizational groupings such as fields, but regarding more temporary and fast-moving organizational forms, and how they may shape the repertoires, logics and concerns of actors. Especially when actors are placed in uncertain situations where they must 'dance' to more than one institutional 'tune', one must ask, "Who will speak truth to power?" A discomforting result is an important result and may, in the longer term lead to better use of resources, yet it may be disastrous for people with no steady institutional support for, no repertoire facilitating, the exercise of independent judgement on evidence. That voluntary regulation was not particularly well regulated was not a too surprising result from this thesis; what was shocking was the readiness of numbers of researchers and others to follow the lead set by the standard 'Account' and to present results in accord with it, *even when crucial data were missing*.

Environmental writing on voluntarism has encouraged a wariness of 'the lobby', alongside a cheery new focus on the potentially helpful role of NGOs (e.g. Bendell 2000). Yet the 'ideal type' conjured by references to NGOs tends to focus on stalwart, mass public membership, activist organizations. They can also, however, dependent on strictness of definition, include a hinterland of consultancies, some stemming from universities, operating with no public base, as discreet companions of those with formal power, yet generally presenting as impartial public organizations, whilst dependent on, perhaps unpublicised, contracts and grants for survival. If they are contracted to engage in tasks for which there are preconceptions of outcomes, institutional pressures may shape the presentation of outcomes to meet the demands of the contract, (this having itself been set up to meet pre-existing expectations)<sup>11</sup>. The tendency is likely to be reinforced as strong, confident voices build around this practice, effectively masking other ways of seeing, and the whole reinforced because on these results and stances, reputations, and hence further opinions, are built. There are many truths which can be stated about any situation and such results may not necessarily be false - though they are likely to be convenient. It is important, however, to set up circumstances where there is time and freedom for more 'awkward' findings to emerge, where, by close attention to concrete situations, there is the possibility to define situations afresh rather than to merely fit them into existing theoretical frameworks (Colin and Losch 1994:341).

#### Implications of the findings for theory

This has been exploratory research and it is hoped that the findings and discussion about them have the potential to contribute to institutional theory. Particular ways that the research findings might contribute to theory are discussed more fully in the preceding chapter; this part sets out some of these matters concisely.

The thesis has focused on intermediaries, termed here 'folk', in temporary positions who worked with

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<sup>11</sup> This accords, too, with the separate point by Ferraro, Pfeffer and Sutton (2005) on the self-fulfilling tendencies involved in the use of particular theories of social science, which act both to perpetuate such theories and to embed ideas from the theories in the language and assumptions of economics.

the (temporary) resources of grants, helping to create a transient public discourse (deployed, for example, in draft policy documents as new attempts were made to define waste policy). Using theoretical constructs from institutional theory to explore these short-lived matters has exposed certain of their features and shown that activities linking to the longer term, in particular to securing further resources for the next project, were important factors in what occurred, so that the projects, with the intervals between them, where they occurred, had a processual quality, rather than being individual instances aiming for change.

1. In particular, the research has underlined the claim that there is a discourse gap within the theory. Intermediaries, and those working on temporary projects cannot easily be accommodated in the theoretical constructs and ways of seeing of institutionalism. Yet outsourcing is becoming more prevalent, particularly in policy areas where voluntary options may be perceived as more likely to effect change than formal regulation. This thesis has suggested that intermediaries can be construed as taking on the role of commensals at the edges of organizational fields (and without any implication that they are beneficial, as symbiotes, or detrimental, as parasites). This has implications for notions of fields and it also potentially links the institutional literature very well to the emerging literature on boundaries, boundary objects, etc. and draws in recognition of those many millions of people who work in the short term, formally outside, or frequently changing between and not accepted as part of, established organizational entities.
2. It also potentially enables researchers to draw better distinctions when describing certain activities. If intermediaries, with their 'shape shifting' characteristics in their temporary roles, can be introduced to the repertoire of choices, there is no need, necessarily, to classify, for example, NGOs and trade associations, as acting in a purely regulatory capacity. The term regulator may be used more precisely for parts of their activities, and other aspects of their influence be more fully appreciated.
3. The discussion chapter included an argument suggesting that the intermediaries in their projects could be seen as comprising a structured mode, with stipulated activities, routines, etc., which is organized in the expectation of change, where change is parturient, as it were, but does not necessarily occur. Other examples of this were cited. If this is reasonable, and if, in particular, the activities of intermediaries in regard to bricolage - given their positions of uncertainty of rules and norms - are considered as widely as has been suggested - then the intermediaries with their projects can be seen as a potential source of new ideas, new practices, and hence change within the institutional entities with which they deal. Its occurrence, and possible benefits, would depend on factors including the intermediaries' skills in translation (of understanding of the new fields with which they deal), their tendency to buffer and edit, the relative transience of their roles and the arising of contention.

#### **Suggestions for further research**

This research, set between a number of different disciplines, has suggested a new way of viewing what occurs in voluntary regulatory initiatives. It opens up a number of potentially very interesting lines of theoretical questions for future research. Three kinds relating to institutional theory and regulation are

considered here but first there is a need to link back to the issues which prompted the research.

In focusing on institutional factors affecting voluntary initiatives to promote resource efficiency, this research has, as it were, side-stepped the issues of global over-exploitation of resources and their consequences, including changes to climate and potential future scarcities, which were the reason for the initiatives, and the initial motivation for the research. It is patent that much more research is needed on ways institutional factors may block or assist changes towards wiser, fairer and more conservative stewardship of global resources. Current trends suggest, however, that many measures to combat such global problems will be instigated via voluntary regulatory initiatives of various kinds, so that the findings here, even concerning these small initiatives, may yet be helpful.

Hirschhorn, cited in Chapter 1, concluded in 1997 that in the U.S. there had been a failure of the 'bold vision' of the potential new intellectual paradigm, pollution prevention, which countered 'the inevitability of industrial wastes and pollutants ingrained in peoples' minds and in government regulations and technologies' (1997[2000]:55). This had happened, he concluded, because it threatened established practices, power systems and the huge industry of pollution control, and he cites (though he does not use the terms) cognitive, regulative and cultural factors. Fatally, he argues, pollution prevention had been represented in the U.S. as a kind of subset of pollution control, and as if it necessarily entailed 'win win'; in regulatory matters, radical change had been

"largely thwarted by embedding pollution prevention within EPA's existing pollution control culture and regulatory system"

and it had been introduced in a fragmented way, intermixed with varieties of 'sham' pollution prevention, including the use of mere examples rather than comprehensive detailed data to indicate progress. Gloomily, these factors will be recognised by readers of this study. And yet these findings may contribute in some small way to future research aimed at circumventing impediments to pollution prevention, at least in increasing understanding of contractual and policy practices where the institutional conditions, and the mix of needs, constraints, cautiousness and cosiness, contributed to obfuscation and to short-term and patchy claims-making, when there might - even by careful reporting of failures - have been a more lasting contribution to beneficial change.

1. It was briefly speculated in the thesis that government departments, with their outsourced agencies and outsourced contractual arrangements, often linked by relationships of long-standing, might be considered as a small organizational field, with its own norms, values, practices and conflicts, operating to influence other fields. In other terms, the activity of the islands of the 'archipelago state' might each be usefully construed as an organizational field of a particularly influential type. As Fligstein (1998:43) says, "The problem of the relation between fields, and between fields and the state, is one of the great theoretical frontiers of institutional theory." Further research could develop the preliminary findings here, in what has been essentially an exploratory study, regarding the role of the state, and state-encouraged consultancies in relation to the fields they attempt to influence. This may be particularly useful in terms of further exploration of the writings by Edelman and others on the unanticipated effects of state regulation which, it has been posited, can be attributed to self-

regulating tendencies existing within organizations. It is possible, of course, that it links more clearly to consultancy and other third party activity.

2. Scott (2001:54) has made the point that we need to understand more about how regulatory institutions interact with other institutional elements. This study has shown that intermediaries, with their direct access to information on the course of voluntary regulation and other initiatives, have the potential to influence opinion on current policy initiatives and to shape ideas on appropriate future policy actions. This is a relatively ignored area because consultant activity does not 'fit' easily with the usual boundaries for studies of a given organization or a group of similar firms. There are few studies of the regulatory nexus between a firm, its advising consultancies and its regulators, and even fewer of the state and its advising consultancies and its regulatory initiatives.
3. There is also a need to explore more carefully the means and effectiveness of the 'regulation of voluntary regulation'. More longitudinal studies of the effects of such interventions are required, as well as more research into other types besides the negotiated agreement. Again, we do not yet appreciate the full costs of voluntary regulatory initiatives if the costs of consultancies and other intermediaries are not specified. The view of voluntary regulation from inside a regulatory body is frequently of something marginal; that from within academia is that it is very much more important and prominent. Should we routinely review, not only the methodology of research, but the circumstances of its source - given the incentives for academics to write about initiatives for which they or their departments have received grants, and the motivations that must exist for making those grant payments seem worthwhile, or the results at least interesting.

## **Appendix 1. Example of an interview schedule**

*(Schedule drawn up for semi-structured interviews in case studies)*

Interviewee:

Date:

### **Background to becoming involved with the Club**

1. Can you outline your involvement with the Club?  
What kinds of environmental activities had you begun before the Club started?
2. What do you believe to be the main aims of your organization in regard to the Club?

### **Questions about you and your involvement**

3. Can I ask some questions about your background and education? (How much do you think this might have predisposed you to look favourably on environmental questions?)
4. What is your main work at the moment?

### **Personal involvement with Club activities?**

5. How much of your time has been taken up with involvement with the Club?
6. What parts of the clubs activities have you actually been involved with? Have you been to the seminars? How many people normally attended the meetings?
7. What would you say are the most important things that you have learned from your involvement with the Club?

### **The Club membership**

- 8a. Do you know how the companies were found.?
- 8b. Were you satisfied with the spread of different types of company in the Club, as far as you knew
9. Do you think there could have been more members of the Club?

10. To what do you attribute either the reluctance of the companies to get involved?

11. In some instances, it has been found, people who have attended the Clubs have gone back to their companies with what they thought were good ideas and staff at the company haven't liked it. Do you think there have been conflicts within the companies in the Club, as a result of changes brought about by the club?

#### **Club techniques and successes**

12. Did you have a waste audit done?

13. Of the training that you saw, did you think that some of it could have been disseminated more widely outside the club? Could it have helped other people outside the club?

14. Of the savings that have been used to publicise the club, can you think of a couple of examples of the savings that seem to you particularly outstanding?

15. When you first got involved, what did you see as the main role of the consultants?

16. What do you now believe to be the role of consultants in projects like this?

#### **Networking**

17. Outside formal meetings what other organisations have you networked with to do with the Club?

18. Do you think that involvement in the Club has actually influenced your ability to network?

19. Have the increased contacts led to changes in your business practice?

#### **Overall assessment**

20. What things about the Clubs have given you the most trouble?

21. Do you consider that environmental regulation and the presence of regulators have helped or hindered the work of the club? Have there been instances where there have been compliance issues, to your knowledge?

22. Do you think there were enough incentives for the workforces in the companies, to get them to participate?

23. What would you say are the main barriers to innovation that the Clubs address?

24. Can you think of another method ... if the clubs didn't exist ... can you think of another method of getting change in this area that might be better?

25. What do you see as the most significant change from the Club?

26. Were you personally satisfied with the results obtained?

27a. Some people would say they have an environmental conscience. Would you say that this is an important factor in how you make decisions?

27b. Would you say that this is more the case than it used to be, making decisions on that kind of ground...

27c. Do you think that the change in your views has been influenced by your involvement with the Club?

28 Do you expect Clubs to have a significant effect on the waste stream?

29. And what do you see as the main problems remaining for the future?

30. Looking back, are you pleased you became involved?

## **Appendix 2. Abbreviations used**

ACBE	Advisory Committee on Business and the Environment
DEFRA	Department for Environment, Food and Rural Affairs
DETR	Department of Environment, Transport and the Regions
DoE	Department of the Environment
DTI	Department of Trade and Industry
EA	Environment Agency for England and Wales
EC	Commission of the European Union
EEBP	Energy Efficiency Best Practice Programme
ETBPP	Environmental Technology Best Practice Programme, the fore-runner of Envirowise, the name of the organization charged with demonstrating the benefits of resource efficiency and waste minimisation across British industry
GOL	Government Office for London
IPPC	Integrated Planning Pollution and Control: a statutory means of preventing or reducing pollution from certain industrial installations
n.d.	no date cited
SRB	Single Regeneration Budget: the source of funding for the first case study

### Appendix 3. The terminology of waste minimisation and pollution prevention

This Appendix outlines some of the difficulties caused by the ways that the terms waste minimisation and pollution prevention were used. Fineman (2001:22-27) has suggested that environmental arguments are often distilled to key, "easily scanned" terms, as if their use was unproblematic, yet in practice each of these terms is used in a range of rather different meanings.

#### The variable meaning assigned to the term waste minimisation

The UK definition of waste minimisation is straightforward: the 'reduction of waste at source' (IWM, 1996:15). There are, however, a number of misunderstandings arising concerning the term. The first is the 'natural' assumption that waste minimisation is aligned to, and linked with, issues concerning waste management, even though its practice requires radically different skills. In fact, the waste minimisation clubs were projects designed to deal with all forms of inefficiency of materials and energy by member firms, generally by means which would also reduce harmful emissions, as is indicated by the later name change to 'resource efficiency' clubs.

The term 'waste minimisation' here was meant to signal that all forms of wastage could be reduced, and was thus in effect a synonym for general pollution prevention, and used to mean measures taken to reduce effluents affecting any medium. This was the common meaning of the term for the Environmental Technology Best Practice Programme and is a common use of the term in the United States. Confusion concerning its meaning arises because it is used in a number of ways. Some differences in the use of the term 'waste minimisation' relate to its place at the apex of possible choices set out in the solid waste hierarchy, others appear in usages by different organizations and groups.

#### The solid waste hierarchy and the place of waste minimisation within it

Waste minimisation or its near equivalent term, waste reduction, is always set at the top of the 'solid waste hierarchy', a revered guiding principle for waste management used in many policy documents across the world which is, as the phrase goes, much respected in the breach. It sets out preferences as to how choices should be made about materials which may be discarded as waste. In the UK, the hierarchy first appeared in the White Paper on Sustainable Development in 1994. In fact the hierarchy has no scientific provenance (Schall 1992) and its detailed interpretation has been the subject of debate. (e.g. The Waste Manager 1998:5; Warmer Bulletin, 1997:17) Whilst Waste Minimisation is always stated as the best option, and Re-use the second, there are disputes about the positions of options in the next layers - Recycling, (often with Composting cited separately as an equivalent) and

Disposal with Energy Recovery. At the base of the hierarchy is the most used option in the UK - Disposal Without Energy Recovery.

The use of the hierarchy carries the assumption that complex sets of decision problems can be simplified into a set of ordered preferences. (Theoretically, one is, as it were, invited to imagine a scenario in which systematic choices are made, exploring options for particular materials which might be discarded as waste, and running from top to bottom of the categories in each case). In practice, however, waste minimisation is a rarely chosen option within the hierarchy, for a number of reasons discussed below. In practical terms, the problems faced by decision-makers are nearly always complex and interlinked with other constraints and priorities. There has been no recognised international guidance accompanying the waste hierarchy as to how the tool is to be linked to other prioritisation systems, nor how cost implications are to be weighed and the UK government's 1998 consultation paper on waste recognised this uncertainty (DETR, 1998a:10). Economically, it can also be argued that practices, routines and expertise will be 'locked-in' to particular, pre-existing technologies, such as landfill (Arthur, Durlauf and Lane 1997), and under such circumstances thinking about appropriate action may be constrained and alternate choices masked by the (possibly unconscious) habitual momentum to remain acting in the current modes.

Usage of the term waste minimisation in relation to the hierarchy varies. It may be used as an activity distinct from all the others in the hierarchy, as for example, by Crittenden and Kaloczkowski who define it as:

'any technique, process or activity which either avoids, eliminates or reduces a waste at its source.' (1992:2)

It can also be used to mean a method of approaching waste management which focuses on reduction at source, but also includes reuse and recycling of materials. A typical definition is that of Mark Smith:

'Waste Minimisation involves any technique, process or activity which either avoids, eliminates or reduces waste at its source, usually within the confines of the production unit, or allows re-use or recycling of the waste (preferably within the confines of the process producing the waste) for benign purposes.' (Smith: 1996:8)

Such usage is sometimes modified, particularly in engineering contexts, to define waste minimisation as an activity taking place *at the site of a process*. This is a relatively common distinction with what is termed 'zero waste' initiatives by industry where the aim is to have (almost) no discarded materials going for disposal, even though some may leave the premises for recycling or reuse. It is fairly standard for such initiatives to divide the measures they take into waste minimisation (in this sense), re-use and recycling off-site and any residual wastes which go for disposal (which last they aim to eliminate by increasing the first three markedly). An example of this usage is this definition from the European Commission (1998:1): 'waste minimisation is used as an equivalent for waste prevention and includes source reduction by input material change, technological change (equipment and/or process) and good operating practice... on-site re-use and on-site reclamation of waste materials.'

#### Differences in usage unrelated to the hierarchy

There are two fairly idiosyncratic usages: The term is very occasionally used to represent making discarded materials smaller, or more compact. Another relatively unusual use of the term involves making a distinction between waste reduction (activities involved in not

producing waste at all) and waste minimisation, (the activities of reducing the waste stream once produced).

Then there are other differences, frequently related to specified definitions used by powerful organizations. For example, the USEPA frequently use waste minimisation as a term denoting the activity of reducing the hazardous qualities of a waste stream. Of particular importance here, in the early years of the Environment Agency in the UK the term was confined to reduction in solid wastes, excluding actions where air- or waterborne effluents were reduced. This distinction reflected the separate and powerful hierarchies dating from predecessor organizations, notwithstanding the fact that the Agency was instituted to provide integrated regulation throughout all media. This distinction was to have major implications for the time allowed for staff to work on waste minimisation clubs, for it was then perceived as separate from work done to reduce water consumption or liquid effluents, which was termed 'pollution prevention' and coded, and prioritised differently.

Much more commonly the term is used to mean general prevention of any inefficient use of resources, including water usage and energy usage and sometimes even including labour. It is sometimes used as equivalent to clean technology or cleaner production.

#### Differences in usage by differing social groupings

The four most serious differences of usage, however, can in each case be related to a set of relevant people, each with different concerns, capacities for action and differing constitutive roles.

The first example here relates to division of work within organizations. In firms, measures to reduce the materials discarded may not be within the remit of those managers charged with waste management, for such managers usually deal with materials which have already been discarded as waste or which are expected to be so. They are likely to have little power or influence over factors upstream, for example over design features which lead to waste, technical aspects of a product which may involve unnecessary wastage of materials (which may have been chosen for, say, marketing reasons) or certain technical process characteristics. In incentive terms there are few groups within those working on waste management who are certain to gain financially from a decision to reduce waste. (Specialist consultants may be exceptions). Again, under present conditions most waste management companies which deal with waste materials have most potential to increase their turnover by shifting their operations, if they have the plant, to focus on forms of reprocessing, or incineration - although profitability here is often dependent on efficient systems for separation - rather than skills in advising firms how to reduce their wastes. For waste disposal firms a thorough-going attempt at minimisation may prove to be against their interests, if it is not linked to measures such as increased recycling.

Whilst senior decision makers in firms or government might make changes using the concepts of the hierarchy, both are likely to have other pressing problems and waste is traditionally a topic area of low status and less interest. For policy makers working on these issues, there is a further constraint, for the prevailing institutional climate within national government makes it almost unthinkable that they should consider constraining consumer or business choice by applying, say, precise rules or targets based on the hierarchy. The dominant social values across large parts of society have been that it is appropriate for people to purchase as they

choose and to discard as they choose, and any major change to these practices may be seen as both an affront and such a potential hazard to aspects of the economy, which is predicated on growth, that it would be politically unacceptable.

The waste management hierarchy is thus useful as a simplified way of explaining the range of choices; it is also a valuable aspirational marker setting waste minimisation above all other options. Yet the social groupings likely to think in terms of the hierarchy are those already working on or concerned with wastes management or focused on pollution issues. The constraints affecting such groups meant that waste minimisation was, at the time the clubs were introduced, an option rarely chosen.

Waste minimisation can also be viewed as part of normal measures used within the firm to increase productivity. For engineers and others working on productivity issues, the idea of reducing the resources used in creating products in order to save on costs is a well-established practice. They may not, however, see this activity, which is usually seen as part of the drive to *increase output relative to inputs*, as related to the environmental agenda, and may not link their practices to potential wider benefits regarding pollution reduction or engage in discourse with either the waste management industry and its intermediaries or other environmentalists about it. In this view of course, they may be right, for the end result of such measures, if unaccompanied by other changes, will be merely to make the product or service cheaper, and thus more likely to be sold. Henningsson (2001) and others have drawn attention to this 'rebound effect' of waste minimisation.

A third way the term waste minimisation is used is as part of the wider discourse around global resource efficiency. If this discourse, which has been that of a specialist field, became more dominant it would have the potential to draw in increasingly large numbers of those concerned with such matters as the design of products, manufacturing equipment and services, and with sourcing and distributing those materials and products. Attention to the overall use and depletion of natural resources has huge potential for bringing about savings; for example consideration can be given to means of gaining maximum value from the resource input into whole series of firms involved in industries across several countries, considering matters of quality, quantity, and length of usefulness, and also maximising usage of those materials which are discarded as waste and minimising their potential harm. Entrepreneurs, designers and product manufacturers who decide on the characteristics of what they are to produce, how long it will last, how much of it will be manufactured, with what byproducts and with what raw materials, have great potential for making changes which will result in reduced use of resources. Yet at the time that the waste minimisation clubs developed, few of them saw this as a priority and there was no clear institutional means to engage them so that they would begin to make decisions on the basis of these concerns.

Linked to these resource issues, waste minimisation is also discussed in terms of, broader discourses on sustainable development and associated 'greening' of business. Reductions in waste materials, substances and energy are essential to the aims of sustainable development yet because they only comprise a tiny part of this huge discourse, they are problems that may not get priority. Also, as before, those engaged in these discourses may have little scope to make decisions which have significant impact in terms of effluents. As part of the general green agenda the term is frequently used for all possible savings in resource usage for environmental reasons. Again, the skills of the current waste sector and its intermediaries - other than general

hortatory ones - add very little to the implementation of significant changes.

Thus these 4 principle ways of using the term waste minimisation each relate to different contexts and different sets of people, each set, to use a term of Searle, with different deontic powers. Within those discourses, the expectations accompanying the term vary; distinctions such as whether pollution prevention is the only method to be used, or whether pollution control systems more generally are to be included may or may not be appropriate; the notion of who are the appropriate parties to control (and determine the aims of ) a successful 'waste minimisation initiative' will also vary.

There was thus at the start of the period of this study, a confusion around the usage of the term 'waste minimisation'. It was claimed as an important endeavour but there was no clarity as to how, in practice, it should be followed, and with what level of rigour, nor, because of the different groupings, each using the term rather differently and with different aims and interests, was there a straightforward institutional base for its championing and adoption. The definition within this thesis is straightforward: the reduction of materials and energy usage at source, as a separate activity from reuse or recycling. As waste reduction in this sense nearly (but not always) reduces harms to ecological systems, this definition is treated as consonant with the term pollution prevention unless there is a need to draw attention to a finer distinction which should be made.

Terms differ not only in what they are used to designate but in terms of imagery. Waste minimisation, with its shabby component word 'waste', was a humbler, more confined and practical term than 'pollution prevention' focused on both the starkly harmful 'pollution' and the radical concept prevention, and carries much less intellectual excitement. The next paragraphs consider the discourse on prevention.

### The concept of pollution prevention

It is difficult to overstate the importance of the concept of pollution prevention in the early 1990s and the excitement it carried for environmentalists. A USEPA Memorandum informed all EPA personnel that the organization is 'seeking to integrate pollution prevention as an ethic throughout its activities' (Habicht 1992). The concept of a preventative approach, which was an established one in the criminological literature began to be taken up more widely in regard to social policy generally (for example Perri 6 1997, Sabel 2001). Pollution prevention, as a holistic approach was implicitly integrated in its effects and was therefore very challenging to an established order based on different (media-based) professional disciplines in environmental technology and regulation. Especially where it was accompanied by claims of cost saving (Schmidheiny 1992), it not only breached common assumptions of environmental economics (suggesting that the costs per unit of output for firms would be greater where reductions are made in polluting effluents) but had implications for accounting procedures and systems. If used with new voluntarist approaches its potential for change appeared even greater, seeming to promise that many problems, currently the concern of regulators, need not arise and that the regulator-regulatee relationship was not essentially conflictual but consensual, and that dealing with pollution problems radically would facilitate cost savings both by the organization and for the public, so that such interventions should be welcomed. This transforming conceptualisation was spoken of as if it had the potential to instigate a step change in what was possible and linked to radical calls for what was termed dematerialisation of the economy (Ross

cited in Freeman et al 1992:620). These issues were associated with hugely divergent perspectives among professionals about what were priorities.

And yet this was a mere discourse; the settled, institutionally recognised task and discipline for environmental regulation was pollution control. This was so much a part of the fabric and deployed logics of day-to-day practice that its centrality was often unconscious; sometimes in articles the text 'rolls' from pollution prevention into pollution control, or there is elision of the mere possibility of prevention. Glachant, for example, (in an admittedly exploratory approach) considers the cost efficiency of negotiated agreements for industrial sectors, purely in terms of pollution abatement and assumes that the cost of this is known (1999:75). Similarly, Borkey and Leveque, 2000, in classifying public voluntary schemes presume that there are only two types, ones which weaken the economic effects of legislation on particular sectors and those which induce innovation and *pollution abatement* beyond compliance (italics mine). In fact, many such initiatives focused on pollution prevention and were also associated with savings on costs. Alongside this 'wobbling' in the literature there was no settled consensus even in regulatory circles about the use of terms. Jim Craig of the USA EPA (EPA 1993) remarked that he had worked in the EPA's pollution prevention program for four and a half years, approximately 10,000 work hours and that he had the impression he had spent 8,000 of those hours on the debate as to whether recycling was included in the definition of pollution prevention. Whatever its definition, pollution prevention was not widely taken up; its adoption was incremental, not revolutionary. Hirschhorn, (1997, reprinted 2000) in a famous article mourning this, and seeking explanations for our social failure to choose 'benign technology', points to semantic confusion and misleading claims, but above all, to issues of power and (though he does not use the terms) institutionally embedded practices. It is hoped that the explorations here regarding the clubs will help in some small way to an understanding of what is necessary for better practices to emerge.

## Appendix 4. Reports of waste minimisation clubs obtained

- Black Country Business Environment Association 2000, *Black Country Waste Minimisation Group Report*, November, Wolverhampton, Black Country Waste Minimisation Group
- Business Link Bedfordshire and Luton, with EnviroMarch and Cranfield University at Silsoe, n.d. , *Project Bedivel: a waste minimisation programme for Bedfordshire and Luton*, Kempston Bedfordshire, Business Link Bedfordshire and Luton
- Centre for the Exploitation of Science and Technology with Aspects International Limited and W.S. Atkins North West, c.1977, *Dee Catchment Waste Minimisation Project*, London, CEST
- Clarkson, Paul and Julie Adams 2001, *Wellingborough Resource Efficiency Project: Final Report*, July, Northampton, University College Northampton
- Environment Agency, 1997b, *Hereford and Worcester Waste Minimisation Group Review*, Solihull, Environment Agency Midlands Region
- March Consulting Group 1998, *Northumbria Waste Minimisation Club: Final Report*, May, Manchester, March Consulting Group
- Johnston, Neil on behalf of the Centre for the Exploitation of Science and Technology, 1995, *Waste Minimisation; a route to profit and cleaner production - Final report on the Aire and Calder Project*, 6 July, London, CEST
- Kersey, Jim 1995, March, *Leicestershire Waste Minimisation Initiative Project Report*, March, Leicestershire Waste Regulation Authority, Leicester
- Leather, Jill 1999, *Less waste more profit; first year report of the pilot Gloucestershire Waste Minimisation Initiative 1998-1999*, Tewkesbury, Environment Agency Lower Severn Area
- O'Brien, Geoff and Ross Mowbray 1999, *Project Tyneside Waste Minimisation Project Final Report Summary and Case Studies*, June, Newcastle upon Tyne, University of Northumbria at Newcastle
- O'Brien, Geoff and Ross Mowbray 1999, *Project Tyneside Waste Minimisation Project - additional Company Report, Introduction and Conclusion*, Newcastle upon Tyne, University of Northumbria at Newcastle
- Pike, Karen 2000, *Northamptonshire Resource Efficiency Project Report*, May, (CD), Northampton, University College Northampton
- W.S. Atkins Consultants Ltd. with March Consulting Group and Aspects International 1994, *Project Catalyst: Report to the Project Completion Event at Manchester Airport*, 27 June, Warrington, W. S. Atkins Consultants Ltd.
- W.S. Atkins Consultants Ltd. with the Centre for the Exploitation of Science and Technology, Kent County Council, Environment Agency and Environmental Technology Best Practice Programme, 1998, *Medway and Swale Waste Minimisation Demonstration Project Report*, Bristol, Environment Agency
- WSP Environmental c.1999, *SABINA (Sustainable Business in Action), Severn Estuary Waste Minimisation Project*, Cardiff, WSP Environmental
- WSP Environmental 2001, *Leicestershire Waste Minimisation Association Project Report*, May, Cardiff, WSP Environmental

## Appendix 5. Government policy on waste and resource efficiency 1980-2000

This Appendix sets out a brief history of the policies on waste and resource efficiency in the UK from 1980 to the introduction of Waste Strategy 2000 (the last significant policy document during the period on which this study focuses), outlining some of the pre-existing concerns and uncertainties which were operative and emerging, so that the take-up and use of the waste minimisation clubs within this context can be better understood.

At the beginning of the 1980s, waste management in the UK was very largely a matter of putting unwanted materials in landfill. The discourse around the need to reduce wasteful use of resources had not developed to any great extent in this organizational field, and it was commonly assumed that supplies of landfill sites would continue to be plentiful and that they represented an efficient, engineered mode of dealing with a perennial social problem (Petts, 2002:176). Measures to introduce private sector financing of services such as waste disposal were being introduced, and it was not certain that local authorities, which were still seen as the natural operators of waste services, would continue to be the main mode of delivery; this also militated against capital expenditure on alternatives to landfill.

Modifications to legislation on waste materials during the 1980s largely concerned hazardous wastes, termed 'special wastes' under the old British system. The Special Waste Regulations were introduced in 1980. These provided a rather cumbersome system of a requisite pause (before wastes could move) and a paper trail, which would follow hazardous wastes from their place of arising to their final destination and the absence of which might provide evidence of non-compliance. In 1982 this was followed by the establishment of the Hazardous Waste Inspectorate, with duties to visit firms producing such wastes to discuss and advise on their processes. Officially sanctioned disposal routes for such wastes were incineration at relatively low temperatures or co-disposal with other wastes at landfills. That there should be paper systems, relying on coloured carbon-copies, inaugurated at this time, and that faith should be placed in advisory visits and careful recording and storage of documents, alongside such modes of treatment, gives a clue of what was considered appropriate by policy designers in the Waste Directorate of the Department of the Environment at the time.

These bureaucratically focussed, and rather weak measures to deal with waste problems can be seen as indicative of a disjunction between the priorities of those setting up systems at the Department of the Environment and what they considered to be satisfactory and suitable, and the range of ideas developing in other, bigger arenas concerning such problems. World-wide, during the 1980s, there came to be an increased awareness and exploration of the comparatively new concept of sustainable development, setting out the view that environmental protection could accompany economic development and announcing a new view of responsibilities and of what was seemly to do in the face of immense global problems (World Commission on Environment and Development, 1987). This was a time of the expression of new and different aspirations; whilst many were consumerist, there were also the signs of new green philosophies of sustainable ways of living. By the end of the decade the European Union had, in its 1989 Waste Strategy (SEC(80)934), introduced the concept of sustainable waste management, making clear the importance of waste reduction.

The major policy changes being introduced by the Conservative government of the time were market-focused; market-based measures were being increasingly discussed and considered, alongside huge changes to a range of public services in line with the Government's philosophy. Older modes of state intervention in the economy were abandoned, for the state was conceptualised as being an unsuitable vehicle to bring about changes which

might be brought about by markets; its role was rather to encourage new and improved markets, for example by providing information which would be most effectively deployed by firms themselves acting in their own best interests. Economic arguments were those which carried power, and the use of, and perceived reliability of, cost benefit analyses, is indicative of this (Rydin,2003:102-7). Accompanying these views was a strong international debate surrounding the perceived shortcomings of standard regulatory approaches, particularly with regard to the costs which they conferred on business. Market-based and technological approaches dominated.

Yet despite these major new ways of considering the appropriate role of the state - regarding sustainability, new approaches to regulation and the setting of rules, and giving pre-eminence to market activity - there is evidence suggesting a reluctance, an inability almost, within the government departments concerned, to engage with these ideas and to come up with radical (or even less than radical) responses to the challenges. Sections of the public might have enthusiasm for, say, recycling activity, but the 'reclamation' of industrial wastes continued as before, and very little was done to introduce recycling schemes for householders. Whilst the conservation and sustainable use of resources might be proclaimed to be a good thing, there was very little action by departments within government which affected these problems. Very little in the legislative array affected waste reduction. This was a state of affairs which was to continue into the next decade, where policy statements and draft statements about what was to be done about waste problems were issued, saying, in the main, very commendable things, yet very little was done. The ministries comprised, as it were, a hive of inactivity at the centre.

It was statements made in the Conservative government's 1990 White Paper on Sustainable Development, 'This Common Inheritance', which were to tie the administration into a commitment to taking action regarding inefficient usage of resources. The White Paper contained an announcement, linked to economic arguments concerning benefits and incentives for industry, that

"the Government's priorities are to reduce waste at source or reuse what is left, and dispose of the rest in the most environmentally responsible way." (1990:186)

This claim, whilst it had little immediate practical effect, was to be used much more centrally in several policy documents over the next decade.

In the same year the government produced the 1990 Environmental Protection Act. Part I of the Act finally put in place enabling legislation for an integrated regulatory system proposed by the Royal Commission on Environmental Pollution, in their Fifth Report, fourteen years before. This was to put an end to situations - well known to environmental regulators - where alleviation of a problem in one medium can create new problems in another. Now there was recognition of the need for damage to be minimised by directing releases to the medium where they would cause least damage. However, its implementation, institutionally, was not to be straightforward. The main contribution of the Act to waste reduction by industry came from a novel regulatory mode which had no applicability to the vast majority of firms - the Integrated Pollution Control regime. Firms operating processes regulated under the new IPC regime would be required, before they could receive authorisation, to carry out a formal assessment and put in place a waste minimisation programme. The change was supported by the relevant industry, and, interestingly, intermediaries from the professional organisation concerned were instrumental in its early adoption (Smith 1996:12). The impact of this mandatory requirement for minimisation of effluents was limited, however, for it applied only to prescribed processes listed in Part A of the Act, and only to prescribed substances specified in the Regulations (Gouldson and Murphy, 1998:75).

The Act also introduced major changes to waste regulation. While most were marginal to resource efficiency<sup>1</sup> some have relevance for this narrative: the new system was fragmented, it emphasised minimisation of immediate costs, and brought changes which fostered a certain rivalry between local authorities. Local authorities retained their overarching responsibilities as regards waste but many services, including that of waste collection, were made subject to Compulsory Competitive Tendering, facilitating employment of private

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<sup>1</sup> They included the requirement to create disposal plans, the recycling credits scheme and new duties on district councils to create recycling plans.

contractors rather than direct service delivery by in-house staff. This effectively privatised the greater part of the service. Waste Disposal Authorities were also required to facilitate privatisation, either by setting up systems to have their previously-owned waste disposal sites run by arms length local authority or joint venture companies, or by contracting with private sector firms for these services. The difficulties of regulation of processes being carried out by the same authority were eliminated (except in Wales) by the creation of separate departments within Counties deemed Waste Regulation Authorities. This fragmentation of roles instituted a system where the remaining local authority staff working on waste (either overseeing the provision of contracted services carried out by others or regulating what occurred) interfaced much more closely with the waste management industry. It also meant that few at the local level had call to consider the total system of waste creation, collection, movement, treatment and disposal in which they were involved or to take responsibility for making the whole system less damaging to local ecosystems. (It is notable that the recycling of householders' wastes, which received most attention, was an amelioration of that segment of the system which dealt with collection and treatment - the section on which most people working in the local system were engaged). The policy approach to recycling - which exhibited many parallels with the later arrangements to promote waste minimisation - emphasised locally-driven projects (with the provision of large grants for early projects and declining monies available for later ones) to demonstrate what worked. This resulted in very unequal service provision in different authorities, a point not disregarded by the public, and led to a tendency for councillors to seek to ensure that their own council was seen to be running initiatives.

The disparity between concepts of appropriate policy on waste in the UK and in the EU was made apparent in 1991 with the publication of the Hazardous Waste Directive (91/689/EEC) and the associated new Hazardous Waste List (defining applicable categories of materials); these were not compatible with the pragmatic British systems in operation, using a radically different approach to assess hazard. The British stalled for some time on this, ineffectively trying various measures so as to retain the threads of their old system. In the same year the revised Framework Directive on Waste was published (Directive 91/156/EC [1991] OJ L 78, 26.3.1991, p.32) in response to increasing volumes of waste materials across Europe, and which promoted waste reduction and especially recycling activities. In much of Europe the beginning of the 1990s saw considerable activity on recycling - especially in Germany, Denmark, Holland, and Austria. The focus of this early legislation was on collection; markets became flooded and prices dropped across Europe, ruining many small businesses in the UK reclamation industry, particularly paper and plastics recyclers, but no effective action was taken to protect them. In the UK attention by policy makers on waste was still focused on disposal.

In 1992, the year of the Rio Convention on the Environment and Development, the first evidence emerged questioning the sufficiency of landfill provision in the South-East of England. (Petts, 2002:177.) It was estimated that the total waste produced in the UK in 1990 was of the order of 435 million tonnes (an estimate given in *Making Waste Work*, 1995:3) although doubts were expressed even at that time of the accuracy of these figures. These were not quibbles over percentage points. Something of the haziness of the regimes in operation is grasped when one considers the singular lack of measurement in the industry at this time. Even in 1999, Phillips, Read et al. could still record that over 25 per cent of Waste Collection Authorities in England and Wales weighed none of the loads that they delivered to landfill and over 60 per cent weighed less than half of them (1999:222). Many landfills, being small, did not have weighbridges. Also, a lack of well-designed national studies meant that there was poor knowledge of the characteristics of a number of waste streams. The Environment, Transport and Regional Affairs Committee could still state in 2001:

"We remain extremely disappointed with the data available on waste arisings: the data available is incomplete, unreliable and often published too late to be of use."<sup>2</sup>

In this culture, at once technocratic and antithetical to routine measurement, the staple of understanding was instead a complex system of classification of types of waste, which formally excluded certain categories of waste from the need for measurement or control<sup>3</sup>. Matier (1995) found a similar situation more widely in Europe. By its nature, waste is not something to which people pay attention - their common attitude is one of denial or repugnance. It had long been in the interests of waste management companies to be imprecise about

<sup>2</sup> accessed at [www.parliament.the-stationery-office.co.uk/pa/cm200001/cmselect/cmenvtra/36/3607.htm](http://www.parliament.the-stationery-office.co.uk/pa/cm200001/cmselect/cmenvtra/36/3607.htm) on 9.7.05

<sup>3</sup> For example, agricultural wastes.

the amounts of material being moved around and disposed. The mechanisms of recording were an increased cost and were not, at the time, demanded by the legislation. This lack of data precluded good forward planning, so that many statements about waste flows at that time were generalities deploying rhetoric rather than reflecting data collected and formulated into evidence.

The EU, with its Fifth Environmental Action Plan, gave formal recognition that a sustainability agenda would entail working with business (CEC, 1993), and this, coupled with the existing pro-business agenda, gradually led to a situation where business involvement and the inculcation of partnerships became seen as key elements in modern environmental policy. The Advisory Committee on Business and the Environment which had been set up by the Department of the Environment in 1991 to improve dialogue and consensus with industry on environmental policy, produced its second progress report in 1992. This included a call for better ways of convincing firms - especially smaller firms - that waste reduction was necessary and beneficial (Eden, 1996:133-7). The Committee's Environmental Management Working Group offered to assist by, *inter alia*, providing speakers at events and identifying local 'champions' who might inspire firms to change. They set out recommended approaches, one of which was the use of clubs, arguing for government sponsorship of ten case-study clubs initially<sup>4</sup>. These proposals for voluntarist approaches from such a respected group were to have considerable influence in the early development of the waste minimisation clubs.

The 1994 publication of "Sustainable Development: The UK Strategy", made a clear link between the wise management of resources and sustainable development (DoE, 1994:149). Yet a formal policy on waste management from the Department of the Environment did not follow for nearly six years. In 1995 the Conservative Government published "Making Waste Work: A strategy for sustainable waste management in England and Wales" (DoE 1995). This set out a controversial version of the waste hierarchy to support its case: whilst waste reduction was set at the apex, it was declared that 'Recycling, Composting and Energy Recovery' were a 'single recovery category' and that none of them 'should automatically be preferred to any other as this will depend on the Best Practicable Environmental Option for a particular waste stream'. In response, in part, to the concerns over this, the Government announced that the document was meant to be an advisory document rather than a policy document. Further draft waste policy documents were to follow in 1998 and 1999 before "Waste Strategy 2000" finally appeared.

This hiatus in the creation and running of an agreed policy seems to have encouraged two trends: first, a reversion to concerns with 'core matters' about which there could be no argument (such as licensing and monitoring of waste management sites), and second, a somewhat greater reliance than there might have been on repeating the details of individual programmes which appeared to be successful - in effect using them as a rhetorical device to assert that activity was taking place.

The mid 1990s saw a number of new pieces of legislation on specific areas; most had facets which were intended in some measure to influence waste reduction by industry, but for all, the main thrust was on the complexities of the interface with the existing waste management industry. For example, 1994 saw the publication of the Waste Management Licensing Regulations: largely a document about protocols for permitting, this included lengthy lists of exemptions from licensing, some of which were heavily exploited when the Landfill Tax was introduced, resulting in loss of incentive for firms to reduce waste and loss of data and control on significant areas of activity on waste arisings and movements. In 1995, the Environment Act laid the statutory basis for the creation of the Environment Agencies, which took over the regulation of waste, incorporating most of Waste Technical Division of the DoE. Whilst they were given a remit with regard to

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<sup>4</sup> Eden reports that ACBE suggested renaming waste minimisation "Total Process Efficiency" as this would appeal more to business, but this was rejected by the government.

waste minimisation, it was imprecise (stemming from ss 4 and 5 of the Environment Act 1995<sup>5</sup> ) and laid the foundations for years of indeterminacy on the matter. The Landfill Tax of 1996, the UK's first major use of environmental taxation, was expected to incentivise, and so promote, waste reduction measures. Unfortunately there is little evidence that it did reduce waste flows in its early years. (Partly this reflected poor monitoring systems, for many sites lacked weighbridges, but also the legislation inadvertently created incentives for firms to make use of exempt sites (where there were even poorer controls), to divert their waste into the (free) household schemes, or to fly-tip.) The pro-voluntarist stance of the administration in these years, even in the face of industry preferences, is demonstrated by the late publication of the Producer Responsibility Obligations (Packaging Waste) Regulations in 1997, (SI 648, under Directive 94/62/EC) after over 2 years' debate with parts of industry, which had been continually pressed by government to set up a self-regulatory scheme, but distrustful of potential free-riders, preferred cumbersome but enforceable legislation. These regulations, with their recycling and recovery targets for packaging waste, created some incentives for firms to reduce their overall use of packaging, but major incentives to boost recycling.

In 1998, the newly named Department of the Environment, Transport and the Regions, produced a further consultation paper on waste strategy, "Less Waste More Value", which gave more support to the aim of waste reduction. The document set waste management as a whole within the category of sustainable development. It proclaimed that 'a strong emphasis on waste minimisation' was part of the 'seven key commitments' of the 'Government's vision.' (DETR, 1998a: reverse of front cover). As suggested above in regard to rhetorical uses of programmes, in this document whilst only a couple of pages in total were given over to discussing waste reduction strategies, nearly a page was given over to describing the work of the ETBPP and a box describing improvements at 2 companies (Ideal Standard and Walkers Snack Foods) which had benefited from it. The document extended the term waste reduction to cover reductions in toxicity and to methods of reducing household waste. It considered the possible extension of the role of local authorities as a result of Ann Link's Waste Minimisation Private Member's Bill then going through Parliament<sup>6</sup>, mentioning the possibility of variable charging schemes for local authorities and the promotion of waste minimisation via local authority collection contract terms. It also, rather emptily, invited views on other means of encouraging industrial waste minimisation.

The disparity between rhetoric and the miserable impacts of the operative policies was decried by the House of Commons, Environment, Transport and Regional Affairs Committee in their report into Sustainable Waste Management in 1998. The Committee was very critical of the lack of accurate data with which to draw up statistics on the arising and disposal of waste materials. It accused the Environment Agency of having an inadequate strategy for waste minimisation and commented that the lack of direction for waste minimisation was endemic, with little incentive for companies to commence projects. The tattered quality of this field of policy is shown by their much-reported scathing attack:

"It is important to stress.... our profound disappointment on the basis of evidence we have received, that waste management in this country is still characterised by inertia, careless administration and ad hoc, rather than science-based decisions. Lip-service alone, in far too many instances, has been paid to the principles of reducing waste and diverting it from disposal. Central Government has lacked the commitment, and local government the resources, to put a sustainable waste management strategy into practice."

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<sup>5</sup> s.4(1) describes the principal aim of each Agency 'in discharging its functions so to protect and enhance the environment, taken as a whole, as to make a contribution towards attaining the objective of sustainable development'. Section 5(1) states that 'The Agency's pollution control powers shall be exercisable for the purpose of preventing or minimising, or remedying or mitigating the effects of pollution of the environment.' Section 5(4) requires it to 'follow developments in technology and techniques for preventing or minimising or remedying or mitigating the effects of, pollution of the environment.' and s.5(3)(b) requires it to prepare and send reports to the Minister, if asked, identifying options which it 'considers to be available for preventing or minimising, or remedying or mitigating the effects of, pollution of the environment...'

<sup>6</sup> The Waste Minimisation Act 1998 amended the Environmental Protection Act introducing a new s.63(a), which empowered local authorities to 'arrange for the doing of, or contribute to the expenses of the doing of, anything which in its opinion is necessary or expedient for the purpose of minimising the quantities of controlled waste, or controlled waste of any description, generated in its area.'

Another draft strategy, 'A Way with Waste (A draft Waste Strategy for England and Wales, Parts One and Two)," followed in 1999. The need to reduce waste was highlighted in the Foreword by Michael Meacher and the then Secretary of State for Wales, Jon Owen Jones.

"At the heart of the strategy is tackling the growth in waste, which in some sectors is as high as 3 per cent per year. Each household produces over a tonne of waste per year on average and industry and commerce produce 70-100 million tonnes of waste in providing us with goods and services. We need to use resources more efficiently and to make greater use of secondary resources."

The document sets out a whole range of commitments, linking waste to sustainable development and the problems of climate change, and emphasising the need to use resources prudently. The vast majority of the proposals, however, which were to be set out formally in the following year, related to recovery of materials and to targets dictated by Europe. The actions proposed for business and commerce to reduce wastes were combined in a list which included recycling measures, and emphasised Producer Responsibility initiatives (where the focus is on recovery and proofs of recycling), and on product labelling (to facilitate recycling). They also listed a set of measures which had the potential to reduce wastes, such as Supply Chain Management, Environmental Management Systems, improved Business Reporting, work that was ongoing with specific sectors to encourage them to address 'the triple bottom line' and mentioned the needs of small and medium sized enterprises for assistance in waste reduction and recycling. Interestingly, the document has a discussion on the benefits to local authorities from developing partnerships with business in building their recycling systems. Part One also carried two paragraphs on the ETBPP and its work (3.5 and 4.34).

Thus during these years there was no certain government policy on waste reduction, merely a number of draft documents. (Each of these, however, was accompanied by the usual press releases, interviews, seminars for the trade to take account of the new views, etc., and, echoing Cudahy, some intermediaries involved in the clubs were amongst the private sector actors who took part in this promulgation). Accompanying the indecision from government, there was an increasing tendency to make reference in documents, seminar presentations, etc. to successful results from programmes which were believed to be operating well, to bolster appearances (and possibly in part to conceal inaction) and the work being done by ETBPP was frequently cited as an example of government achievements alongside successful initiatives, for example on recycling, (of which there were many hundreds of projects going on at this time). Meanwhile, issues concerning waste, and the lack of progress, particularly on recycling, were generally becoming more political, especially at the local level.

A decided "Waste Strategy 2000" eventually incorporated a definition of sustainable waste management into policy (Petts 2002:176) and set out some very ambitious targets for recovery, recycling and composting, stating that by 2005 the industrial and commercial waste sent to landfill would be reduced to 85 per cent of that landfilled in 1998. Its introduction was closely followed by major measures across the existing waste management industry to implement the Landfill Directive, (Directive 1999/31/EC) by the due date of 16 July 2001. This finally introduced Europe-wide standards to landfill, *inter alia* recategorising them according to the materials they were permitted to accept and stipulating pre-treatment. As regards waste reduction, again there was rhetoric decrying landfill as a 'wasted opportunity' arguing that, if there was to be a more sustainable economy, 'we must do more with less, and make better use of resources' (both, DETR, 2000, Part I, para 1.5 cited by Petts 2002:176-177) but in practice, attending to compliance issues at landfills consumed attention. Policy on the subject was derided by the all-party Environment Sub-Committee on 21 March 2001:

"The most serious criticism of the Strategy is that it is a misnomer: that there is no strategy, or vision, rather a list of aspirations and some relatively weak levers to achieve those aims."

The Committee warned that

"Although Waste Strategy 2000 does set in train some improvements it is woefully inadequate to bring about the step change required in the way we think and deal with waste. Minimisation should be at the heart of the strategy but is paid only lip service. Quite simply, the strategy is an awkward and underfunded compromise when this area is crying out for leadership and ambition from the government."

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<sup>7</sup> accessed at [www.parliament.the-stationery-office.co.uk/pa/cm2001/cmselect/cmenvtra/36/3607.htm](http://www.parliament.the-stationery-office.co.uk/pa/cm2001/cmselect/cmenvtra/36/3607.htm) on 9.7.2005

The policy approaches operative nationally during the period of focus of this study have now been set out. The account has stressed the absence of a decisive policy and that where there were policy choices, the focus was on improvements to pre-existing routines concerning already wasted materials. Whilst there was implementation of measures demanded by Europe, and there were calls from influential bodies for waste prevention to be central to strategies, those responsible for policy shied away from measures so radical; instead, considerable use was made of 'good news stories' concerning initiatives such as the waste minimisation clubs, and it is the substance of these stories and those from whom the claims originated that form the focus of this thesis.

**TABLE 2.1 Examples of individual clubs cited in general evaluations of waste minimisation clubs**

Clubs cited shown in red; studies of a single club or single region are excluded, as are studies of clubs abroad

*Note that studies earlier than 97 or 98 had very few clubs which had ended or reported to evaluate*

**Evaluative studies in date order**

1995, Environmental Information Bulletin, Vol 43, The Costs and Benefits of Waste Minimisation (unattributed editorial), May, pp12-16

Nature of study: general evaluative overview of clubs which had operated by that date:

Aire & Calder Catalyst LWMI

1999, Phillips, P., Read, A., Green, A., Bates, M., UK Waste minimisation clubs: a contribution to sustainable waste management, Resources, Conservation and Recycling, 27, pp. 217-247.

Nature of study: general evaluative review; they include a table of 'reductions in wastes arisings for KEY Project clubs' (1999:231, Table 6)

Aire & Calder Catalyst LWMI Dee Hereford & Worcester Humber Forum WEFT WMWM

2000, Pratt, R. and Phillips, P., The role and success of UK w. minimisation clubs in the correction of market and information failures, Resources, Conservation & Recycling, 30, pp. 201-219

Nature of stuc general evaluative review considering the clubs in relation to neo-classical economic theory

Aire & Calder Catalyst LWMI Dee Don Rother Deame Hereford & Worcester Humber Forum Tayside Food Merseyside WEFT WMWM Medway & Swale Knowsley

2000, Pratt, Rachel M., and Phillips, P.S., Waste Minimisation Clubs in the UK: Cost Benefit Considerations, Environment and Waste Management, 3 (3), pp 113-122

Nature of study: evaluation using cost benefit analysis

Aire & Calder Catalyst LWMI Dee Don Rother Deame Hereford & Worcester Humber Forum Tayside Food Merseyside WEFT WMWM Medway & Swale Knowsley

2001, Henningsson, Stefan, The future of Waste Minimisation Clubs: providing stimuli for UK industry to prevent pollution at source, presentation at University of Hertfordshire, 23.3.01

Nature of study: general evaluative review which also considers the future of the projects

Aire & Calder Catalyst LWMI Dee Don Rother Deame E. Anglia Food Hereford & Worcester Humber Forum Tayside Food S'pton&Eastleigh

2001, Henningson, S., Pratt, R. M., Phillips, P.S. and Hyde, K., Waste Minimisation Clubs: A Cost-Efficient Policy Instrument?, European Environment, 11 pp 324-339.

Nature of study: evaluation using cost benefit analysis

Aire & Calder Catalyst LWMI Dee Don Rother Deame E. Anglia Food Hereford & Worcester Humber Forum Tayside Food S'pton&Eastleigh

**Other studies, not focusing on evaluation or evaluative review, but which cite certain clubs as examples:**

1997, Phillips, P., Murphy, A., Read, A., Waste minimisation in England, the role of County Councils, Proceedings of the Institute of Waste Management, pp.9-13

Nature of study: consideration of the potential role for county councils in relation to clubs; this study mentions, but does not draw conclusions from:

Aire & Calder Catalyst LWMI Hereford & Worcester Humber Forum

1999, Phillips, Pike and Bates, J. of Solid W. Tech'gy & Mgt, Vol 26, Nos 3 & 4, (Nov) Developing Effective W. Minimisation Clubs: a case study from the East Midlands, pp 97-113

Nature of study: consideration of clubs in E. Midlands, comparing them with earlier clubs

Aire & Calder Catalyst LWMI Humber Forum

Comparisons made with: Leicester WM Phase 2; Lincolnshire Food; Lincoln 2000; Northants Phases 1 and 2; Northampton REP, N. Kesteven, Nottingham W. Min

2002, Phillips, P.S., Clarkson, P. and Barnes, N.J., A UK county sustainable waste management program, Int. Journal of Environment and Sustainable Development, Vol 1, No. 1

Nature of study: review of clubs in Northamptonshire (Kettering, Northampton, NREP, Wellingborough); includes a comparison with other "key" clubs (their term) and "more successful" clubs

Aire & Calder Catalyst LWMI Dee Don Rother Deame Hereford and W. Humber Forum Tayside Food

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