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Dismantling of European environmental policy: how great expectations in Brussels are dashed by Italian subnational implementation

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ABSTRACT

Environmental policy has experienced significant expansion, with debates often centred around concerns of environmental overregulation. In response to the perceived burden of administrative requirements imposed by European regulations, the EU Commission initiated an Action Programme for dismantling environmental policy in 2007. Consequently, the Italian national government adopted a single environmental authorization provision in 2013. The effect of this simplification action at the subnational levels was a piecemeal implementation among Italian regions. The empirical contribution of the paper involves assessing the effectiveness of environmental policy dismantling at the regional level in Italy and identifying the capacities that influence this process. Through a comparative analysis of various dimensions (coordinating, regulatory, and delivery capacities), the study will show that the top-down approach for reducing red tape does not necessarily align with the administrative and implementing capacities of Italian regions, which are often affected by endemic problems.

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KEYWORDS Implementation research; policy dismantling; multilevel governance; administrative capacity; de-regulation; delivery capacity; regulatory capacity

Introduction

European environmental policy is a paradigmatic example of EU expansion (Benson and Jordan 2014; Pollack 1994). Indeed, environmental matters have been subject to European regulation since the early 1970s, although they were not formally addressed by the Treaties. The strong growth of regulation has led to an ‘over-regulation’ (Majone 1994) in the environmental sector that

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has repeatedly come under attack because many have feared that this policy may undermine the sovereignty of the Member States (Golub 1996) or create additional costs for European firms, or impose administrative burdens that penalize their competitiveness (Coletti 2016; Coletti and Radaelli 2013; Wilkinson et al. 2005), as recognized by the EU Commission (CE 2012; CE 2016; CE 2023). In the environmental field, the differentiated implementation of EU directives, the overabundance and fragmentation of the requirements imposed on companies are obstacles to compliance and to the effective achievement of policy objectives (Coletti 2024; Dente and Lewanski 1982; 1983).

The dismantling of public policies in the environmental field has been explored by several scholars, who have tried to determine why political actors activate dismantling processes and what strategies they adopt (Gravey and Jordan 2016; Jordan and Turnpenny 2012; Jordan, Wurzel, and Zito 2013; Jordan, Wurzel, and Zito 2013). These studies have been conducted both in the United States (Berry, Burden, and Howell 2010; Ragusa 2010) and in Europe (Bernauer and Knill 2012; Jordan and Turnpenny 2012; Radaelli and Salter 2019). Policy dismantling produces its effects by reducing the administrative burdens on businesses that must comply with disclosure of information to the public administration or to third parties. The objective of the measurement is to identify and simplify the administrative obligations that are burdensome on businesses. Thus, dismantling intersects to both better regulation policy and the reduction of red tape (Radaelli and Salter 2019).

Since 2005, the European institutions have engaged in a process of 'dismantling' some policy areas by proposing actions to remove policies characterized by unnecessary administrative burdens. The programme for improving regulation at the European level has gone beyond the vision of simple **deregulation** and sought to combine different simplification techniques to achieve policy objectives with the least possible burden on private individuals (Black and Baldwin 2012; Radaelli 2018b).

In 2007, Gunter Verheugen, the European Commissioner of DG Enterprises, defined an ambitious target for reducing administrative burdens on businesses, and launched an *Action Programme* with the aim of measuring and reducing the administrative burdens generated by European legislation in the Member States (CE 2009). This document identified the environment as a priority area. In January 2009, the programme was extended from 42 to 72 legislative acts, for which a reduction of 80% of the administrative burden imposed by the European Union was envisaged. The *Action Programme for Reducing Administrative Burdens* (CE 2012) proposed a simplification of administrative burdens amounting to approximately EUR 302 million deriving from Community sources, through the adoption of several simplification measures in different areas (environment, agriculture, food security etc. ...).

This underlined the Commission's commitment to Better Regulation as part of the 'Growth and Jobs' strategy. The Commission stated that the

overall 25% reduction target was a joint objective, which can only be achieved based on a shared responsibility by the Member States and the European Institutions. Thus, all parties and member states involved in this process should have taken appropriate actions to translate the political objective into operational measures for the benefit of the business community and of the consumers. Environmental policy was identified as one of the domains where the European Union (EU) has progressively acquired additional competencies. Furthermore, it is argued that these expansions in environmental regulation adversely impact the EU's economic competitiveness (Steinebach and Knill 2017).

Within the European multilevel system, subnational regions not only participate in the implementation of European policies but also play a role to the reverse process of policy dismantling, wherein policies undergo reduction or diminishment in intensity. This article delves into the involvement of subnational regions in the dismantling of European environmental policy, with a particular focus on the case of Italy.

The remainder of the paper unfolds as follows: the theoretical framework is outlined in the second section, while the third section details the methodology and the research design. The fourth section provides empirical evidence on evaluating the effectiveness of the environmental policy dismantling at regional level through a comparative analysis of subnational capacities in Italy, as discussed in the fifth section. Finally, the concluding section proposes some suggestions for further research.

The European environmental policy dismantling process and administrative capacities at the Italian regional level

Policy dismantling has been examined in the field of policy studies through various lenses, with a notable emphasis on welfare-state retrenchment literature. Scholars such as Pierson (1994), drawing on institutionalist perspectives, have investigated the erosion of social policies that originated in the pioneering analyses carried out by Brewer (1974) and Behn (1978) on the termination of policies (Lasswell 1956). Concurrently, a separate strand of literature has delved into deregulation processes and their impact on state-regulated domains, particularly within environmental spheres (Majone 1994). Those studies focused on the demand for 'deregulation' that first emerged in the United States (Moran and Prosser 1994), and which included the design and the application of specific tools combining deregulation with re-regulation, as envisaged by the EU regulatory reform agenda (Howlett 2006; Majone 1996). Recently, there has been a growing emphasis on the reflections pertaining to the simplification and improvement of the design and quality of regulation (Baldwin, Cave, and Lodge 2011; OECD 2003; 2006; Radaelli and De Francesco 2007; Xanthaki 2014; Radaelli 2018a; 2018b).

Offering a comprehensive framework, Bauer et al. (2012) have elucidated the mechanisms, causes, and outcomes of policy dismantling across diverse policy domains. Defined as a process that reduces the number of policies or policy instruments and/or diminishes their intensity, policy dismantling can alter fundamental aspects of a policy or its implementation and oversight capacities (Bauer et al. 2012). 'Policy dismantling' takes up and expands this definition: 'a change of a direct, indirect, hidden, or symbolic nature that either diminishes the number of policies in a particular area, reduces the number of policy instruments used and / or lowers their intensity. It can involve changes to these core elements of policy and/or it can be achieved by manipulating the capacities to implement and supervise them' (Bauer and Knill 2012). Bauer and Knill (2012) introduce the concepts of policy density and intensity as measures of policy change. A decrease in the number of policies or instruments alters policy density, thereby constituting a form of dismantling. Additionally, the preferences of actors and their dismantling strategies must be taken into account to explain why simultaneous trends of rule expansion and policy reduction might occur. Bauer and Knill (2014) delineate four types of dismantling based on their visibility and whether actors actively choose to reduce policy: active dismantling, dismantling by symbolic action, dismantling by arena shifting, dismantling by default. Active dismantling entails a visible reduction in policy following a deliberate decision to do so, while symbolic action denotes policymakers' stated intention to reduce measures without effective implementation. Both strategies are observable and serve to portray politicians as willing to engage in dismantling. Arena-shifting involves the transfer of policies to different arenas (e.g. through decentralization) or changes in organizational structures that result in dismantling. Lastly, dismantling by default is a subtle strategy whereby non-adjustment of standards, for instance, leads to *de facto* dismantling. The latter two types are less apparent, allowing policymakers to pursue dismantling somewhat discreetly, away from public scrutiny (Bauer and Knill 2014). Furthermore, scholars identify low policy ambition, which denotes the 'suspension of further regulatory improvement' (Steinebach and Knill 2017, 438). While it does not constitute dismantling *per se*, it underscores policymakers' efforts to decelerate or halt the expansion of policy.

According to this framework, the political ramifications of dismantling measures are inherently unfavourable; therefore, policymakers may endeavour to mitigate these repercussions by evading, deflecting, or mitigating blame. For instance, examinations of the active dismantling of social policies in Italy and Switzerland have identified strategies for distributing blame and the influence of external factors such as socioeconomic conditions (Schmitt 2012). Recent investigations within the European Union (EU) have underscored the prevalence of such covert strategies, exploring the stagnation

observed in EU environmental policies through mechanisms such as ‘the backdoor’ and ‘comitology procedures’ (Burns, Eckersley, and Tobin 2020b; Pollex 2021; Pollex and Lenschow 2020; Steinebach and Knill 2017). While there is some evidence of sporadic covert policy dismantling, this remains a relatively minor aspect of EU policymaking, even in areas such as the environment (e.g. Brandsma et al. 2023; Burns, Eckersley, and Tobin 2020a; Pollex and Lenschow 2020). This observation is not unexpected, given the intricate nature of the EU’s policymaking process, which involves numerous potential veto-players who must reach consensus for any policy reduction. Accordingly, recent research highlights several factors including attempts to form dismantling coalitions, the influence of environmental movements and their anti-dismantling advocacy, as well as strategies of blame avoidance employed by both the Commission and member state governments (Gravey and Jordan 2020). Given this multifaceted landscape, low-visibility dismantling tactics may appear particularly appealing to policymakers within the European Union (EU), seeking to mitigate potential public backlash.

The literature on policy dismantling has focused more on how the European public decision-makers have prepared actions to reduce and simplify compliance than on how these have been implemented and whether companies have found these measures to be genuinely effective (Gravey and Jordan 2016; Gravey and Jordan 2020; Jordan et al. 2012a, 2012b; Jordan, Wurzel, and Zito 2013). By contrast, there is a lack of in-depth analysis of the effectiveness of dismantling at national and sub-national levels. Evidence shows that the effectiveness of these adjustments is severely compromised in the implementation phase (ENDS Europe 2005).

Simplification policies have encountered obstacles and created a piecemeal implementation that generates situations of imbalance in territorial terms (Coletti 2023; De Winter 2022; Hill and Hupe 2003; 2021; Hupe 2011).

The implementation process is a multidimensional concept since it is strictly linked to many variables which are influenced by the ability of regions and of the institutions that govern them to undertake effective actions (Kleider and Toubreau 2022) and, that enable rapprochement among the performances of the different regions (Crescenzi and Guida 2016; Di Cataldo and Rodríguez-Pose 2017; Rodríguez-Pose and Ketterer 2020). A large body of scientific literature has echoed it on regional development policy, within which there was consolidated awareness of the importance of the institutional context and administration as determining factors for social and economic growth of less developed areas (Nistotskaya, Charron, and Lapuente 2015; Rodríguez-Pose 2013; Rodríguez-Pose and Di Cataldo 2015; Rodríguez-Pose and Garcilazo 2015; Surubaru 2017; Terracciano and Graziano 2016; Tosun 2014; Mendez and Bachtler 2017).

Since the 1970s, *implementation studies* have identified numerous barriers to effectively implement policy programmes (Bardach 1977; Linder and

Peters 1987; Pressman and Wildavsky 1973; Sabatier and Mazmanian 1979; Van Meter and Van Horn 1975): implementation policy is defined as a complex and dynamic process in which several actors with specific policy resources interact (Mazey and Richardson 1994). Accordingly, Hjern and Porter (1981) analysed the role of local networks in affecting the resolution of problems in the implementation process (Gupta and Chhibber 2024).

As stressed (Steinebach 2022), the implementation phase is influenced by the capacity of the actors. Even though it is intuitively simple to assume that 'capacity' can be present or absent in public administrations that effectively, or ineffectively, carry out their tasks, it is more difficult to understand what it is and how it can be measured (Onesti 2020; Polverari 2020). This concept has been defined in various ways as: state or government capacity (e.g. Dunlop, Ongaro, and Baker 2020; Lodge and Wegrich 2014); policy capacity (Peters 2015; Wu, Ramesh, and Howlett 2015); implementation capacity (Pressman and Wildavsky 1973).

As part of this, the Commission proposed that the 2007 Spring European Council set a reduction target of 25%, to be achieved jointly by the EU and Member States by 2012. This can be considered as strategic relocation of policies to alternative venues, such as through decentralization of policy dismantling. Given the characteristic low visibility of dismantling attempts, they could indeed be categorized as instances of policy dismantling by *arena shifting*. Thus, in line with the commitments undertaken at Community level, the Italian Department of Public Administration measured the most expensive procedures and reduced administrative burdens on businesses. Thus, the Italian Department of Public Administration took charge of the European action programme implementation and identified, as one of the main critical issues for companies, the different environmental authorizations that companies must acquire to carry out their business (Coletti 2023). The estimation of cost reduction savings amounted to 860 million euros: seven environmental regulations forced companies to resort to different administrations with different validity periods (Regions, Provinces, Municipalities, ARPA, etc.) to obtain the environmental authorizations necessary for their activities. The Decree February 2012, n. 5 and, the following Decree of the President of the Republic 13 March 2013, n. 59 established the Single Environmental Authorization (*Autorizzazione Unica Ambientale*, henceforth AUA), which replaced every act of communication, notification and authorization required by current environmental legislation for SMEs. Hence, the AUA became the single environmental authorization provision, its purpose being to simplify the procedure by replacing seven different authorizations². The application for release, accompanied by the documents, declarations and other certifications required, must be submitted to the Single Desk for Productive Activities (in Italian, *Sportello Unico Attività Produttive* – henceforth SUAP) which verifies its formal completeness and immediately transmits it, electronically,

to the competent authorities (i.e. the region, autonomous province, or other authority indicated by the legislation).

During the implementation of the environmental simplification, the administrative actors did not change (interview nos. 3, 4), and this was a great incentive for strengthening the policy's adoption. The dismantling policy strategies became proactive and oriented towards achieving simplification results. As already highlighted (Coletti 2023), the simplification policy exercised at Italian national level effectively led to the rationalization of seven different authorizations to a single instrument (the AUA). Thus, the process of policy dismantling with respect to the abolishment of a certain number of authorizations was activated proactively by the national actors.

The Department of Public Administration enlarged the network by involving the regions because it envisaged the significant decentralization of regional competences and its role in the implementation process. The State-Regions Conference – an interregional institutional body – was involved by signing an Agreement (March 2007), both in the first phase of consultation and in the process of adoption and implementation of the measures: the State and the Regions set themselves the objective of reducing by 25% by 2012 the obsolete, redundant, or repetitive administrative burdens and information obligations imposed on businesses (Article 9).

Research methodology and research design

Referring to the policy dismantling of the Commission, Gravey and Jordan (2020) stressed that 'in the 2000s and 2010s, the dismantling strategies moved away from the 'symbolic' to the more 'active' end of our continuum' (Gravey and Jordan 2020, 357). Specifically focusing on environmental policy, Gravey and Moore (2019) suggest that this policy domain had become firmly entrenched within the EU, with limited occurrences of dismantling and concurrent instances of expansion, a finding corroborated also by Lenschow and Sprungk (2010).

By considering various levels of governance, from local to supranational, policymakers can better understand the complexities of dismantling policies and address the challenges that arise at different scales. Particularly, the top-down approach to reduce red tape does not seem to reconcile with the administrative capacity of the Italian regions and their implementing capacity driven by endemic problems.

Policy dismantling was intercepted by the Italian national level, which introduced rules of administrative simplification without considering that their application would take place in territorial contexts very different with respect to their administrative capacities. Close attention was paid to administrative policy dismantling. Much less interest was channelled into the kind

of capacities required to sustain the simplification process through the implementation phase.

The research design of this explanatory study aims to provide hypothesis on the relationships between variables and why certain phenomena occur by exploring the underlying mechanisms that contribute to these phenomena. By combining the literature on policy dismantling with the studies on policy implementation, this paper undertakes an analysis focusing on the effectiveness of the European environmental policy dismantling at subnational level in Italy and the linkages with the implementing capacities of the regions.

The environmental policy offers a comprehensive view of the implementation process, spanning from Brussels to national and subnational levels. Using a single case selection strategy as the methodology enables a thorough examination of the impact of a multilayered network of actors on this process: compared to other EU member states like Spain or Germany, Italy is a peculiar case of the phenomenon under investigation since it has several levels of competing administrations composed by 20 regions, 107 provinces, and about 8000 municipalities. It is well-known that Italian regions experience a jeopardized implementation processes which seriously influence the performance of the different regions and, consequently, their social and economic growth. For this reason, it is interesting to focus on Italy which represents a peculiar single case with a high level of variation among the subnational realities, due to the powers' system devolved to the regions in the implementation of such policies.

The empirical contribution of this study consists of assessing **two research questions**:

- (1) whether the environmental policy has been effectively dismantled at the regional level.
- (2) what kind of regional capacities influence the implementation process.

The research hypothesis is to understand whether and how the distinctive capacities of the Italian regions have influenced the policy implementation process and determined their success or their drift into states of policy inertia or expansion. The research offers a cursory examination of the potential causal links between policy dismantling and regional capacities. Thus, the paper investigates regional capacities concerning the management of regulatory and administrative procedures, as well as the enforcement of simplification policies. By examining regional capacities, the research aims to uncover the strengths, weaknesses, and challenges faced by regional actors in managing regulatory frameworks and administrative processes (streamline procedures, reduce bureaucratic hurdles, and facilitate compliance with simplification policies). Furthermore, the study aims to evaluate the effectiveness

of regional enforcement mechanisms in ensuring compliance with simplification policies. This includes examining the enforcement strategies employed by regional authorities, their coordination with other levels of government, and their capacity to monitor compliance. In a similar vein developed by Lodge and Wegrich (2014), an interesting approach has been established that articulates the ability to respond into different dimensions: coordination capacity, regulatory capacity, and delivery capacity.

Coordination capacity is the ability to bring together dispersed stakeholders, and other agencies in decision-making. As widely known (Bouckaert, Peters, and Verhoest 2010; Hood and Margetts 2007; Hooghe, Marks, and Schakel 2010, 53; Kleider and Toubeau 2022; Rhodes 1997), dispersion due to decentralization aggravates the problem of coordinating different actors under difficult conditions. The coordination capacity of the networks of actors can be a major factor in the success of the implementation phase.

Regulatory capacity is widely recognized by the literature on how to improve the quality of regulation. It is the ability of the regulating authority to define comprehensive, clear, and simplified rules (Radaelli and De Francesco 2007). Broadening the definition, regulatory capacity may also involve the other actions that local authorities are able to undertake because of their powers and position. This dimension concerns understanding how this policy has been implemented at the regional level with respect to the regulation adopted, the definition of the instruments adopted, the adoptions by the various regions, and the level of regulatory cogency of the instruments, assuming the equation that the more binding instruments are, the more regulatory pressure is imposed on businesses. Thus, the analysis will deploy this dimension in the following indicators: timing of rules adoption; regulatory tools adopted; incomplete or missing rules.

Then, **delivery capacity** concerns the organization of regulatory processes and ‘making things happen’ (Lodge and Wegrich 2014), and the discretionary resources of street-level bureaucracy (Lipsky 1980). As reported (Casula 2022Piattoni 2010), the level of decentralization in the management of policy can influence the effectiveness of results. Regional and local governments that assume more responsibilities in policy areas, like environment and the level of decentralization in the management of policy can influence the effectiveness of results.

The dismantling process was measured through a combination of desk research, scrutiny of institutional websites, and analysis of the Foromez survey (2019). The survey concerning the AUA Monitoring – Single Environmental Authorization – Agenda for simplification 2018–2020 began in December 2018 and ended in March 2019. Monitoring was carried out on all 90 Administrations responsible for AUA – Regions, Metropolitan Cities and Provinces – distributed throughout the country. At the end of the Survey, the number of competent Authorities that replied to the

questionnaire was 70 (78%), divided among 54 Provinces, and 12 metropolitan cities (for the Regions whose competence in AUA is assumed by the provinces or metropolitan cities) and 4 regional administrations (Abruzzo, Friuli-Venezia Giulia, Umbria and Valle d'Aosta) in cases where the competence in the matter of AUA was delegated to the Regions. It was considered that two regions could not be included in the present analysis for the following reasons: Campania reported a partial number of AUA, which may represent a substantial point of weakness for our analysis; Trento – as autonomous province – has an independent Statutory authority with a specific regulation.

The research design also included the finalization of interviews with key players at both national and regional level (n. 14 interviews March – December 2022). Semi – structured interviews were finalized with experts, officials, and senior managers, combining a pre-determined set of open questions.

How to evaluate the effectiveness of the environmental policy dismantling at regional level?

What was supposed in principle to be a revolutionary simplification action began to get complicated in the implementation phase. Numerous concerns were raised by stakeholders regarding whether the AUA was an effective simplification policy (ANCE 2021; Promo PA 2020); thus, it can be assumed that the dismantling policy did not produce positive benefit on stakeholder.

The revolutionary purpose of the simplification process began to create a lot of confusion from the first months of application, at both an institutional and implementation level. By issuing a ministerial note (November 7, 2013), the Ministry of the Environment gave the first interpretative clarifications for the regions which were struggling to finalize a simplified model for the adoption of the simplification measures. The absence of a national model induced the Regions to adopt their own regional forms, creating several different modules (interview no. 1). On 26 February 2015, the Conference of the Regions approved use of the single standardized form for the Single Environmental Authorization (AUA) to simplify various procedures (production plants, production of energy from small-scale renewable sources). The proposed standardized scheme was to replace all the existing forms of authorization. Therefore, the Regions were forced to adapt their documentation to the national form by 30 June 2015 (deadline set by the Ministries of the Environment and Simplification). Although the simplification action requested by the Public Administration was intended to remedy the uneven and patchy implementation that was being experienced in the area, businesses suffered a confusing situation also due to the changes of the documents to be compiled (interviews nos. 11, 12, 13).

To operationalize the regional capacity concept, the paper will consider the following dimensions and their indicators, as show in [Table 1](#).

Table 1. The framework of the analysis.

Dimensions	Indicators
Coordinating capacity	– centrality of one actor, able to manage the actors – number of actors in the network
Regulatory capacity	– timing of rules adoption – regulatory tools adopted – incomplete or missing rules
Delivery capacity	– Procedural effectiveness: Timeframe of getting AUAs, clarity of procedures; IT platforms – Enforcement effectiveness: Effective operating capacity and efficiency in accomplishing the procedures for Conferences of service and SUAPs

(A)#Coordination capacity

The regional actors implemented the regulatory and organizational phase: depending on the reality in which they operated, these processes encountered difficulties in the being implemented in the specific regional contexts (interviews no. 9, 10, 13). As shown by [Table 1](#), the total number of AUAs reported between 2016 and 2018 testify to the number of businesses requiring the environmental authorizations for the performance of their business activities. Some regions (Lombardy, Piedmont, Veneto) are constituted by many provincial and municipal bodies, which represented a challenge to the implementation process. A single **competent authority** was established in provinces or in a different authority indicated by the regional legislation as competent for the purpose of issuing, renewing, and updating the AUA; the final provision of the procedure adopted by the Single Desk for Productive Activities. In some cases, the competence for issuing the authorization lies within the regions (Abruzzo, Friuli-Venezia Giulia, Umbria and Tuscany and Valle d'Aosta); in other cases, other competent authorities are entrusted with this task (provinces, municipalities). Thus, the regional autonomy generates a situation of non-homogeneity (interviews no. 11, 12) and, the Italian regional panorama deriving from the application of the regulation is jeopardized, also highlighting the respective complexity of the regions.

Regarding their policy networks, the process was organized around centralized competent authorities in 6 regions, and only in the Emilia Romagna case did the regional authority set up nine SACs (office for authorizations within each ARPA) with the duty of coordinating the municipalities, and the provinces. This can be an indicator of the actor's centrality, given by the presence of pivotal actors able to manage the network and make the process effective. The other main players participating in the network were the municipalities and provinces, which were primarily responsible for the effectiveness of

the reduction of administrative burdens for businesses. In 12 cases, regions delegated powers to provinces to coordinate the municipalities: the more the number of provinces were, the more the coordination among actors became problematic. This issue could also influence delivery capacity, as will be shown in [Table 2](#).

Although there was an apparent centralization of responsibilities, the competent environmental authorities remained the public administrations, which intervened in the proceedings replaced by the AUA. Other actors intervened by providing opinions in the sub-procedures: the operator of the integrated water service for industrial waste discharges delivered to the public sewerage system; reclamation consortium; industrial consortium; local health authorities; the regional authorities for environmental protection.

Furthermore, public administrations had to manage their internal complexity: the Regions and municipalities do not operate as single entities but have a series of dedicated services within them, such as the Water Management and Quality Service for wastewater discharges from production activities that do not flow into the public sewerage system; Energy Policy Service for air quality and atmospheric emissions; Waste Management Service for the use of sludge deriving from the purification process in agriculture which follows the specific sub-procedures. To find a solution to their internal complexity, the Italian regions tried to organize themselves to effectively accommodate the AUA's requests and set up the SUAP channel. The submission of the authorizations should be finalized through the established

Table 2. Coordination capacity of the regions.

Regions	Total n. AUA (2016-2018)	Regional level – competent authority (centrality of the network)	n. Provinces	n. Municipalities
Abruzzo	924	YES	4	305
Basilicata	2005	NO	2	131
Calabria	2615	NO	5 (1*)	440
Emilia Romagna	9140 (partial 88%)	Regional Authority and SAC (in each province)	9 (1*)	328
Friuli Venezia Giulia	1766	YES	4	215
Lazio	1302 (partial 60%)	NO	5 (1*)	378
Liguria	507 (partial 75%)	NO	4 (1*)	234
Lombardy	4249 (partial 67%)	NO	11 (1*)	1506
Marche	3555	NO	5	228
Molise	440	NO	2	136
Piedmont	4799	NO	7 (1*)	1181
Puglia	1397	NO	6 (1*)	257
Sardegna	165 (partial 60%)	NO	5 (1*)	377
Sicily	2571 (partial 78%)	NO	9 (1*)	390
Tuscany		YES	10 (1*)	273
Umbria	1808	YES	2	92
Valle d'Aosta	316	YES	-	74
Veneto	5486	YES	7 (1*)	563

Source: own elaboration. * included metropolitan cities.

point of contact (SUAP), and their release to the business's owner (natural or legal person) should take place within 90 days.

As noted by the Formez survey (2020), most of the critical issues that slowed down the AUAs' procedures finalization were due to the management of SUAPs and to the competent authorities in charge of environmental matters. The SUAP became the bottleneck of the process because it received AUAs' submissions, which were parceled out among numerous sub-procedures undertaken by several actors and with different timing (interviews nos. 9, 10, 11, 12, 13).

The problem with the effectiveness of policy dismantling was stressed by businesses which still raised complaints against the red tape. A range of information requirements and administrative practices were applied to businesses by each single entity (province, ARPA, municipality, ASL, region). As reaffirmed by the ANCE survey (2021) carried out on a regional sample, the entry into force of the simplification protocols did not produce the expected effects because the entities continued to be multiple for each individual area. Although the law delegated adoption of the final provision to the SUAP, the time required to issue the authorization remained too long, and the paperwork required from businesses differed according to the area despite the approval of a national form.

(B)#Regulatory capacity

About regulatory capacity, understood as the capacity to make and adopt comprehensive, clear, and simplified rules, the implementation phase led to an uneven territorial application and a belated and confused adoption of regulations by some regions.

Table 2 summarizes how long it took the regions to adopt a regulation. As highlighted, in some cases the number of years calculated between the date of issue of the National Regulation (13 March 2013) and of the regional regulation exceeded one year and, in some cases, amounted at 3 years causing serious problems for enterprises. Both the simplified authorization regime and the unified AUA model finalized by the central state were supplanted by different models developed by provinces and municipalities.

Particularly, the 'regulatory capacity' of regions was exercised by using regional executive decrees (DGRs), followed by another regional executive decree for the approval of standardized documentation for the submission of the authorization with strong cogency at the regional level. Other tools – like circulars, notes, and non-binding regulations – were introduced by several regions to specify previous statements, to correct, or to add other items of information. This can be taken to be an indicator of the procedural inefficiencies and problems that arose during the implementation process. Even if the approach may raise some doubts about its limitations, the not-binding regulation adopted by the regions can reflect whether regions

efficiently accomplished the dismantling process or, by contrast, **expand the policy**. An effect that can be observed is the policymakers' **inertia** when the regional authorities reported delays and/or deficiencies in the implementation policy. In 9 cases, the regional rules were incomplete or lacking. In most cases, the provincial and municipal levels issued interpretative guidelines, expanding the number of regulations (interview nos. 9,11,13). Particularly, Lombardy, Tuscany, Veneto, and Piedmont issued various explanatory circulars (not binding like the regional decree) to respond rapidly to stakeholders' requests for clarification with respect to some unclear passages in the national legislation and, interpretive doubts. In other cases, the **inertia** in rapidly adopting regional regulations was evident in several regions that took a long time to transpose the national regulation: the public officials consulted during the survey complained about incomplete and/or missing regional rules (Table 3).

The analysis showed that some regions transposed the two national regulations – DPR n. 59/2013 and National Decree of 8 May 2015 – in one year, performing in an effective way compared to the other regions. Emilia-Romagna, Lombardy, Tuscany, and Piedmont were able to draft both regulations in just one year and half, and the regional governments obtained a positive assessment by the survey (Table 4).

Table 3. Regulatory capacity of the regions.

Regions	Adoption of National law D.P.R. n. 59 of – 13 march 2013	Adoption of standard formulaire Decree 8 May 2015	Incomplete or missing regional rules (Survey judgment)
Abruzzo	>3 years	1 year	Negative
Basilicata	>3 years	4 years	Negative
Calabria	>2 years	n.a	Negative
Emilia Romagna	< 1 year	< 1 year	Positive
Friuli Venezia Giulia	>5 years	>6 years	n.a.
Lazio	>2 years	2 years	Negative
Liguria	>3 years	1, 5 years	Neutral
Lombardy	<1 year	Several circulars – not binding	Positive
Marche	>1year	>2 years	Negative
Molise	>3 years		Negative
Piedmont	<1 year	<1 year	Several circular – soft law not binding
Puglia	n.a	>2 years	Not regulation – INERTIA
Sardegna	1 year	n.a	n.a.
Sicilia	1 year	n.a.	Negative
Tuscany	>1,5 year	>1,5 year	Several circular – soft law not binding
Umbria	>6 years	>5 years	Issuing guidelines (2019) INERTIA
Valle d'Aosta	>1 year	n.a	n.a.
Veneto	<1 year		Circular – not binding

Source; own elaboration.

Table 4. Delivery capacity of the regions.

Regions	Procedural effectiveness		Enforcement effectiveness		
	Timeframe of getting AUAs	Clarity of procedures (Survey judgment)	IT platform*	Conference of service efficiency (Survey judgment)	SUAPs efficiency (Survey judgment)
Abruzzo	Critical	Negative	NO	weak	Negative
Basilicata	Critical	Negative	IT platforms 2	weak	Negative
Calabria	n.a	Negative	MIX	weak	Negative
Emilia Romagna	Under control	positive	It platforms	Moderate/weak	Negative
Friuli Venezia Giulia	n.a.	n.a.	IT platforms	weak	negative
Lazio	Critical	negative	MIX	weak	negative
Liguria	Critical	negative	NO	weak	negative
Lombardy	Critical	positive	IT platforms interoperability	moderate	negative
Marche	Critical	negative	IT platforms	moderate	negative
Molise	Under control	n.a.	No	moderate	negative
Piedmont	Under control	neutral	IT platformsNot interoperability	moderate	negative
Puglia	Critical	negative	NO	weak	negative
Sardegna	Under control	neutral	IT platforms	positive	negative
Sicily	Critical	negative	NO	weak	negative
Tuscany	Under control	positive	IT platforms	moderate	negative
Umbria	Under control	neutral	NO	n.a.	n.a.
Valle d'Aosta	Under control	n.a	IT platforms	n.a.	negative
Veneto	Critical	neutral	IT platforms	Weak/moderate	negative

(C)#Delivery capacity

As reported (Formez 2021), **the procedural effectiveness** of the administrative proceedings and their timeframe differed among the regions, in some cases generating serious problems (Abruzzo, Lazio, Liguria, Lombardy, Marche). Even if this indicator furnishes some interesting evidence, the analysis should consider the biases due to the number of businesses asking for the permission in each region, the number of AUAs submitted for the opening or renewal of production plants (above all considering the 15 years of authorization validity), and the human resources involved by each region (Interviews nos. 5, 6, 7).

Regarding the **clarity of procedures**, the survey reported that in 8 regions the overall judgment was negative. Complaints were made also by business associations (Osservatorio 2018). The identification of the SUAPs as the authorities competent for issuing AUAs represented a bottleneck for a company especially in cases where it had to start up a new production plant and had to apply for various permits (town planning, building, fire safety, environmental). Those permits were finalized by other authorities (like municipalities) that had the professional's expertise needed to deal with specific issues, and

lean procedures. Where the action that the proposer had to carry out was a simple modification of the already-authorized production structure, and the only authorization to obtain was the environmental one for discharges and emissions: these obliged businesses to submit the request to SUAP, that has no competence in the specific matters, representing a procedural burden compared to the direct request to the Competent Authority. Some of the interviewees (Interviews nos. 12, 13, 14) reported that for some types of water discharge, the possibility of simplified communication procedures would be introduced. Another interviewee stressed that a lot of confusion was also generated by having included communications related to the impact of noise, which are procedures often subject to municipal authorization within the overall comprehensive building procedure (Interview no. 12).

A general assessment of the efficiency of procedures related to the use of **IT platforms** highlights that region adopted different solutions: in some cases, the creation of a regional platform and the possibility of using the national platform (impresainungiorno.it); in the most entropic cases, several IT systems were used to manage AUA processes. Although some Regions had adopted the standards of interoperability among the information systems of the bodies involved in the procedure, not all the actors used the regional interoperability platform to facilitate the exchange of documentation among the bodies involved in the sub-procedures and to update the information present in the AUA Register of Regions. In some cases, a unified telematic channel for submitting applications did not exist and companies had to cope with four different channels of the one-stop shop: regional, chamber, municipal, provincial (Interview no. 6). There was therefore a lack of homogeneity on the local level in the management of SUAPs which generated confusion for companies, especially for those operating in different areas of the same province or region, which were forced to interact with as many different platforms as there were SUAPs to which they had to report (Interview nos. 6, 7). In some cases, there were also documents/dossiers that were submitted via email or in a paper form and were not registered in a telematic channel, entailing that some of procedures were not tracked by the IT system. The best performers seem to be Emilia-Romagna, Lombardy, and Tuscany.

Analyzing the second variable – **enforcement effectiveness** – the research focused on the ability of the actors involved in the process of designing the flow of actions for implementing and monitoring the policy. It considered the following indicators:

- a) **Effective operating capacity of the Conference for Services:** the critical points identified by the survey were the followings: the inertia of third party bodies in expressing the opinions within their competence; many documentation integrations requested from companies; the

administrations' judgements were provided beyond the deadlines, entailing an extension of the timeframe; there was frequent recourse to simultaneous conferences which ensured effective dialogue among the actors involved, after resorting to asynchronous conferences (simplified channel) which involved longer times; organizational issues and shortcomings in personnel skills were also highlighted.

- b) **Effective operating capacity of the SUAP:** Most SUAPs still lacked the professional and technical skills required to manage the complexity of the AUA process. The SUAPs, being responsible for the AUA procedures, should have ensured greater homogeneity in terms of both communication method (PEC or portal) and delivery of information (forwarding of requests and circulation of documents and opinions in general, ensuring the necessary rapidity), and, lastly, compile the administrative paperwork necessary for the adoption of the AUA. For the time being, the SUAPs operated, in most cases, a pure and simple document transfer between the actors involved in the process and the applicant. Moreover, the **organizational structure** of the SUAPs was uneven, with branches often allocated to operators who usually performed other municipal functions (municipal police, tax office, technical office) and there was a lack of resources and adequate training to acquire specific expertise. For instance, the management of the many AUAs required for the sole discharge of industrial wastewater into public sewers meant that the provinces/metropolitan cities had to finalize a number much higher number of procedures without any specific technical expertise.

The overall judgment passed by the survey (Formez [2021](#)) on both the Conference for Services and the SUAPs was negative for almost all the regions assessed. This dimension represents the weakness of the implementation phase and shows the shortfall in **administrative capacities** of the regions unable to provide an adequate level of human resources and manage the procedural effectiveness of procedures. In fact, administrative capacity can reflect «the availability of the abilities and knowledge [...], that allow individuals, organizations, or societies [...] to identify and solve collective problems » (Christensen and Gazley [2008](#), 266).

Discussion

The results show that the management of the implementation phase by the regions were quite similar on the enforcement effectiveness in the delivery phase, while the results on the other two dimensions – coordinating and regulatory capacity – were diversified: it seems that 4 regions performed slightly better than the others: Emilia Romagna, Lombardy, Piedmont, and Tuscany.

About **coordinating capacity**, a fragmentation of powers devolved to different actors led to the development of differentiated implementation practices, dysfunctions in process management, and the absence of a coordinating actor able to manage the implementation phase. The case of Emilia Romagna seems virtuous: within the region, a coordination authority had been created in each province to guarantee governance of the process and take into consideration the province's specificities and the coordination of the various actors. Tuscany adopted the model of Emilia in the centralization of control at the regional level. Both the regions control a smaller number of municipalities compared to Lombardy (1506) and Piedmont (1181), which, on the other hand, place coordination responsibilities at a sub-regional level. The Lombardy and Piedmont networks are more complex and the choice of assigning coordination responsibilities to the sub-regional level would have had repercussions on the critical timing in management of AUA requests. To cope with weakness in coordinating capacities, Lombardy and Piedmont had tried to strengthen their role by **enhancing their delivery capacity**: the regional IT platforms were set up to exercise control over the dispersed processes among the provinces. For this purpose, Lombardy had developed a platform – AUA POINT – to achieve centralized and systematic data collection and replace the transmission of data to the competent Authority, the Municipality and ARPA.

In the four regions, the timescales for transposing the national legislation are limited to the first year and a half. The survey did not reveal any negative effects on the **regulatory capacity** of the regions themselves, which therefore prepared the regulatory indications in a short time to provide companies with a more certain context. Even if the national level showed deficiencies in coordinating the process and giving a clear input on the simplification process, these regions were able to cover the inefficiencies by **expanding soft regulation** and providing suggestion for businesses. The intent of these regions – above all, Lombardy, and Piedmont – was to strengthen their regulatory capacity while their coordinating capacity was somehow compromised by a dispersed governance of actors.

With respect to **delivery capacity**, the procedural times in the four regions improved markedly in the three-year period considered, except for Lombardy, in which only some provinces were able to respect the AUA's timeframe. In the survey (Formez 2021), no negative judgments were expressed on their procedural clarity. All these four regions had set up not only dedicated platforms for the submission of online requests but also systems that guaranteed the interoperability of data among the various administrations, demonstrating that they governed the fragmentation of processes.

The service conferences were effectively managed in synchrony, receiving the judgments of the various administrations without significant delays. With respect to the ability of the SUAPs to respond to requests, the interviewees' judgment was not completely negative. Nevertheless, to overcome this

obstacle, some of the regions organized training courses to improve the SUAP officials' skills.

The duty of oversight was neglected by all the regions in the case under analysis: regions did not create a **shared archive** of all the AUAs issued by the actors in order to be able to start *ex post* inspections intended to verify whether the declared values and thresholds were respected to protect the environment (Interview no. 5). In recent years, only the Lombardy region has established a central system for checking the number of AUAs and strengthening its delivery and coordinating capacity: systematic data collection would have helped in obtaining information for the development of air quality recovery plans and for monitoring critical situations in the implementation phase.

Conclusion

This study has conducted a cursory examination of the effectiveness of environmental policy dismantling at the regional level. Its purpose has been to understand the effectiveness of the European environmental policy dismantling at subnational level in Italy and the linkages with the implementing capacities of the regions.

As regards the **first research question**, it emerges from the analysis that although the simplification policy has been strategically relocated through the decentralization of policy dismantling by the European and national-level authorities, the policy has met different fates at the regional level and **implementation in dispersed governance**. The policy dismantling has seen an expansion – rather than simplification – of the regulation defined by the regions and by the competent authorities in the environmental policy. Furthermore, there is evidence of regions that have adopted an inertial approach which manifests itself in the deferred timing of the adoption of the measures, in the lack of management of the critical issues reported by users, and in a lack of the centralized coordination of procedures. There have been consequences, like a further expansion of the policy or an inertial response to the implementation request, which may strongly undermine the initial objectives of the policy dismantling. Besides expansion, what emerges from the analysis is also the tendency not to shift from their current situation and develop an inertial response: that is, not to adopt implementation regulations and not to design the governance processes, but rather to postpone such actions, leaving stakeholders to follow the old authorization regime. Some evident obstacles can be recalled: the need to reorganize the overall governance of the process, proposing compensation for the actors who lose resources in the reorganization, or managing the inefficiencies in terms of administrative capacity deriving from the actors who must be governed within the process.

With respect to the **second research question** – what kind of regional capacities influence the implementation process and to which degree – the

analysis of the delivery phase showed that the administrative capacity of the regions is disparate. Accordingly, the dynamics related to the implementation phase led to inefficiencies in managing the policy which indirectly involve the contribution of other actors to finalize the release of AUAs, new and complex procedures, conflicting administrative practices between regions if not even within the same region. Thus, the research shows that an effective coordinating, regulatory and delivery capacities influence regional performances in the implementation phase of the policy.

Given the complexity of internal realities, regions that are weak in one of the capacities considered can try to strengthen their role by **enhancing the other two capacities**. Thus, the three dimensions should be connected to each other to strengthen the regional capacity to manage and supervise the implementation phase. This can be provided useful evidence for the implementation literature applied to the policy dismantling processes. The analysis of these capacities within the realities interested by a dismantling policy can reflect the effectiveness of the implementation process and detect the possible obstacles and problems to be addressed.

According to the expectation drawn from the literature, one of the reasons for ineffective and inefficient implementation lies in the administrative capacity of the local actors (Polverari 2020; Steinebach 2022). The four regions (Emilia Romagna, Lombardy, Piedmont, and Tuscany) that performed slightly better are also the regional contexts where social and economic growth are more developed compared to other Italian regions.

Moreover, the paper tried to understand how the administrative capacity can be measured and how it can be articulated at regional level. The three dimensions described and monitored the effective process of implementation in different realities. Thus, a contribution of the analysis in this paper is that proposing a narrow conceptualization of the *regional administrative capacity*, which can be understood as public administrations' ability to effectively implement policies and can be evaluated by measuring their coordinating, regulatory, and delivery capability. At least for the delivery capacity dimension, the correlation between the topic of public officials' training and administrative capacity can offer a strategic perspective basis on which regions can develop relevant actions. While the relevance of administrative capacities emerges as a powerful driver towards proactive implementation according to our research, further micro analysis would be necessary to understand the internal institutional dynamics through which regions are activated in the implementation process.

Notes

1. Project implemented with the technical and financial support of the Italian Ministry of Health - PNC- PNRR- Health, Environment, Biodiversity and Climate.

2. These are: authorization for water discharges; prior communication of the agro-economic use of livestock effluents, vegetation water from oil mills and waste water from the companies; authorization for emissions into the atmosphere; general authorization for emissions into the atmosphere; communication or clearance on noise impact; authorization for the use of sludge deriving from the purification process in agriculture; communications regarding waste

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References

- Baldwin, R., M. Cave, and M. Lodge. 2011. *Understanding Regulation: Theory, Strategy, and Practice*. Oxford: Oxford University Press.
- Bardach, E. 1977. *The Implementation Game: What Happens After a Bill Becomes a Law*. Massachusetts: MIT Press.
- Bauer, M. W., A. J. Jordan, C. Green-Pedersen, and A. Héritier. 2012. *Dismantling Public Policy: Preferences, Strategies and Effects*. Oxford: Oxford University Press.
- Bauer, M. W., and C. Knill. 2012. "Understanding Policy Dismantling: An Analytical Framework." In *Dismantling Public Policy: Preferences, Strategies, and Effects*, edited by Bauer Michael W., Christoffer , and Adrienne Héritier, 30–51. Oxford: Oxford University Press.
- Bauer, M. W., and C. Knill. 2014. "A Conceptual Framework for the Comparative Analysis of Policy Change: Measurement, Explanation and Strategies of Policy Dismantling." *Journal of Comparative Policy Analysis: Research and Practice* 16: 28. <https://doi.org/10.1080/13876988.2014.885186>.
- Behn, R. D. 1978. "How to Terminate a Public Policy." *Policy Analysis* 4: 393–414.
- Benson, D., and A. Jordan. 2014. "Explaining Task Allocation in the EU: Retooling Federalism for Comparative Analysis." *JCMS: Journal of Common Market Studies* 52 (4): 794–809. <https://doi.org/10.1111/jcms.12131>.
- Bernauer, D., and C. Knill. 2012. "When the Dismantling of an Ineffective Policy Becomes Increasingly Costly: Default Strategies, Arena-Shifting, and Symbolic Action in German Waste Policy." In *Dismantling Public Policy*, edited by M. W. Bauer, A. Jordan, C. Green-Pedersen, and A. Héritier, 155–175. Oxford: Oxford university press.
- Berry, C., B. Burden, and W. Howell. 2010. "After Enactment: The Lives and Deaths of Federal Programs." *American Journal of Political Science* 54 (1): 1–17. <https://doi.org/10.1111/j.1540-5907.2009.00414.x>.
- Black, J., and R. Baldwin. 2012. "When Risk-Based Regulation Aims low: A Strategic Framework." *Regulation and Governance* 6 (2): 131–148. <https://doi.org/10.1111/j.1748-5991.2012.01127.x>.
- Bouckaert, G., G. Peters, and K. Verhoest. 2010. *The Coordination of Public Sector Organization: Shifting Patterns of Public Management*. Basingstoke: Palgrave Macmillan.

- Brandsma, G. J., J. Pollex, and P. Tobin. 2023. "Overlooked Yet Ongoing: Policy Termination in the European Union." *JCMS: Journal of Common Market Studies* 61: 1360–1376. <https://doi.org/10.1111/jcms.13468>.
- Brewer, D. 1974. "The Policy Sciences Emerge: To Nurture and Structure a Discipline." *Policy Sciences* 5: 239–245. <https://doi.org/10.1007/BF00144283>.
- Burns, C., P. Eckersley, and P. Tobin. 2020a. "EU Environmental Policy in Times of Crisis." *Journal of European Public Policy* 27 (1): 1–19. <https://doi.org/10.1080/13501763.2018.1561741>.
- Burns, C., P. Eckersley, and P. Tobin. 2020b. "EU Environmental Policy in Times of Crisis." *Journal of European Public Policy* 27 (1): 1–19. <https://doi.org/10.1080/13501763.2018.1561741>.
- Casula, M. 2022. "How Different Multilevel and Multi-Actor Arrangements Impact Policy Implementation: Evidence from EU Regional Policy." *Territory, Politics, Governance* 1 (25): 2162–2671.
- CE. 2009. *Action Programme delivering on promises*, SWD(2012) 423 final.
- CE. 2012. *Action Programme for Reducing Administrative Burdens in the EU Final Report Accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions EU Regulatory Fitness* {COM(2012) 746 final} {SWD(2012) 422 final}.
- CE. 2016. *Regulatory Fitness and Performance Programme REFIT and the 10 Priorities of the Commission*, {COM(2016) 710 final}.
- CE. 2023. *The European Union's Actions to Simplify Legislation: Annual Burden Survey 2022*. Luxembourg: Publications Office of the European Union, 2023. Accessed from https://commission.europa.eu/document/download/fb29f07c-3c53-42ce-8d16-862fbb38c076_en?filename=ABS_20230912_0.pdf.
- Christensen, R. K., and B. Gazley. 2008. "Capacity for Public Administration: Analysis of Meaning and Measurement." *Public Administration and Development* 28 (4): 265–279. <https://doi.org/10.1002/pad.500>.
- Coletti, P. 2016. "Red Tape and the Standard Cost Model." In *Handbook of Regulatory Impact Assessment*, edited by Claire Dunlop, and Claudio Radaelli, 93–107. Cheltenham: Edward Elgar.
- Coletti, P. 2023. "Il Policy Dismantling Della Politica Ambientale Europea: Come Valutare la Semplificazione Regionale tra Policy Inertia e Policy Expansion." *Rivista Italiana di Politiche Pubbliche* 1: 125–148.
- Coletti, P. 2024. *Le Politiche Ambientali*. Bologna: Il Mulino.
- Coletti, P., and C. Radaelli. 2013. "Economic Rationales, Learning and Regulatory Instruments." *Public Administration Journal* 91 (4): 1056–1070. <https://doi.org/10.1111/padm.12006>.
- Crescenzi, R., and M. Guia. 2016. "The EU Cohesion Policy in Context: Does a Bottom-up Approach Work in all Regions?" *Environment and Planning* 52 (1): 134–152.
- Dente, B., and R. Lewanski. 1982. "Administrative Networks and Implementation Effectiveness: Industrial Air Pollution Control Policy in Italy." *Policy Studies Journal* 11 (1): 116–129. <https://doi.org/10.1111/j.1541-0072.1982.tb00241.x>.
- Dente, B., and R. Lewanski. 1983. "Implementing Air Pollution Control in Italy: The Importance of the Political and Administrative Structure." In *International Comparisons in Implementing Pollution Laws*, edited by P. B. Downing, and K. Hanf, 107–128. Boston: Kluwer/Nijhoff.

- De Winter, M. 2022. "Policy Implementation in the Health Sector of the Federal State of Belgium: An Ethnographic Approach." *Regional & Federal Studies* 32 (5): 641–661. <https://doi.org/10.1080/13597566.2021.1915779>.
- Di Cataldo, M., and A. Rodríguez-Pose. 2017. "What Drives Employment Growth and Social Inclusion in the Regions of the European Union?" *Regional Studies* 51 (12): 1840–1859. <https://doi.org/10.1080/00343404.2016.1255320>.
- Dunlop, C. A., E. Ongaro, and K. Baker. 2020. "Researching COVID19: A Research Agenda for Public Policy and Administration Scholars." *Public Policy and Administration* 35 (4): 365–383. <https://doi.org/10.1177/0952076720939631>.
- ENDS Report. 2005. *Where Next for EU Environment Policy?* (06/2005). Accessed from <http://www.endsreport.com/14009/wherenext-for-eu-environment-policy>.
- Formez. 2021. "Report Monitoraggio Autorizzazione Unica Ambientale - AUA Analisi dei dati regionali." http://focus.formez.it/sites/all/files/48_report_monitoraggio_aua-giugno_2019.pdf.
- Golub, J. 1996. "Sovereignty and Subsidiarity in EU Environmental Policy." *Political Studies* 44: 686–703. <https://doi.org/10.1111/j.1467-9248.1996.tb01749.x>.
- Gravey, V., and A. J. Jordan. 2016. "Does the European Union Have a Reverse Gear? Policy Dismantling in a Hypercon-Sensual Polity." *Journal of European Public Policy* 23: 1180–1198. <https://doi.org/10.1080/13501763.2016.1186208>.
- Gravey, V., and A. J. Jordan. 2020. "Policy Dismantling at EU Level: Reaching the Limits of 'an Ever-Closer Ecological Union'?" *Public Administration* 98 (2): 349–362. <https://doi.org/10.1111/padm.12605>.
- Gravey, V., and Moore, B. 2019. "Full Steam Ahead or Dead in the Water? European Union Environmental Policy After the Economic Crisis, edited by C. Burns, S. Sewerin, and P. Tobin *The Impact of the Economic Crisis on European Environmental Policy*, 19–41. Oxford: Oxford University Press.
- Gupta, P., and P. Chhibber. 2024. "Bureaucratic Connections and Local Development: A Study of Palwal District in India." *Regional & Federal Studies* 34 (2): 163–187. <https://doi.org/10.1080/13597566.2022.2086864>.
- Hill, M., and P. Hupe. 2003. "The Multi-Layer Problem in Implementation Research." *Public Management Review* 5 (4): 471–490. <https://doi.org/10.1080/1471903032000178545>.
- Hill, M., and P. Hupe. 2021. *Implementing Public Policy: An Introduction to the Study of Operational Governance*. Thousand Oaks, CA: SAGE.
- Hjern, B., and D. O. Porter. 1981. "Implementation Structures. A New Unit of Administrative Analysis." *Organization Studies* 2 (3): 211–227. <https://doi.org/10.1177/017084068100200301>.
- Hood, C., and H. Z. Margetts. 2007. *The Tools of Government in the Digital Age*. London: Palgrave Macmillan.
- Hooghe, L., G. N. Marks, and A. H. Schakel. 2010. *The Rise of Regional Authority: A Comparative Study of 42 Democracies*. New York: Routledge.
- Howlett, M. 2006. "Conclusion: The de/Reregulatory Cycle." In *Deregulation and its Discontents*, edited by M. Ramesh, and M. Howlett, 228–236. Cheltenham: Edward Elgar.
- Hupe, P. L. 2011. "The Thesis of Incongruent Implementation: Revisiting Pressman and Wildavsky." *Public Policy and Administration* 26 (1): 63–80. <https://doi.org/10.1177/0952076710367717>.
- Jordan, A., and J. Turnpenny. 2012. "From Dismantling by Default to Symbolic Dismantling: Water Policy in the United-Kingdom." In *Dismantling Public Policy*,

- edited by M. W. Bauer, A. Jordan, C. GreenPedersen, and A. Heritier, 176–199. Oxford: Oxford University Press.
- Jordan, A., R. K. W. Wurzel, and A. R. Zito. 2013. "Still the Century of 'New' Environmental Policy Instruments? Exploring Patterns of Innovation and Continuity." *Environmental Politics* 22 (1): 155–173. <https://doi.org/10.1080/09644016.2013.755839>.
- Kleider, H., and S. Toubeau. 2022. "Public Policy in Multi-Level Systems: A new Research Agenda for the Study of Regional-Level Policy." *Regional & Federal Studies* 32 (3): 277–305. <https://doi.org/10.1080/13597566.2021.2018681>.
- Lasswell, H. D. 1956. *The Decision Process: Seven Categories of Functional Analysis*. College Park, MD: University of Maryland Press.
- Lenschow, A., and C. Sprungk. 2010. "The Myth of a Green Europe." *JCMS: Journal of Common Market Studies* 48 (1): 133–154. <https://doi.org/10.1111/j.1468-5965.2009.02045.x>.
- Linder, S. H., and B. G. Peters. 1987. "A Design Perspective on Policy Implementation: The Fallacies of Misplaced Prescription." *Review of Policy Research* 6: 459–475. <https://doi.org/10.1111/j.1541-1338.1987.tb00761.x>.
- Lipsky, M. 1980. *Street-Level Bureaucracy. Dilemmas of the Individual in Public Services*. New York: Russell Sage Foundation.
- Lodge, M., and K. Wegrich. 2014. *The Problem-Solving Capacity of the Modern State*. Oxford: Oxford University Press.
- Majone, G. 1994. "Paradoxes of Privatization and Deregulation." *Journal of European Public Policy* 1 (1): 53–69. <https://doi.org/10.1080/13501769408406947>.
- Majone, G. 1996. "The Rise of Statutory Regulation in Europe." In *Regulating Europe*, edited by G. Majone, 47–60. London: Routledge.
- Mazey, S., and J. Richardson. 1994. "Policy co-Ordination in Brussels: Environmental and Regional Policy." *Regional Politics and Policy* 4 (1): 22–44. <https://doi.org/10.1080/13597569408420885>.
- Mendez, C., and J. Bachtler. 2017. "Financial Compliance in the European Union: A Cross-National Assessment of Financial Correction Patterns and Causes in Cohesion Policy." *JCMS: Journal of Common Market Studies* 55 (3): 569–592. <https://doi.org/10.1111/jcms.12502>.
- Moran, M., and T. Prosser. 1994. *Privatisation and Regulatory Change in Europe*. Milton Keynes: Open University Press.
- Nistotskaya, M., N. Charron, and V. Lapuente. 2015. "The Wealth of Regions: Quality of Government and SMEs in 172 European Regions." *Environment and Planning C: Government and Policy* 33: 1125–1155. <https://doi.org/10.1177/0263774X15610058>.
- OECD. 2003. *From red Tape to Smart Tape - Administrative Simplification*. Paris.: OECD Publishing.
- OECD. 2006. *Cutting red Tape - National Strategies for Administrative Simplification*. Paris.: OECD Publishing.
- Onesti, G. 2020. "La Capacità Amministrativa Delle Regioni Italiane in Un'ottica Comparativa." *Rivista Economica del Mezzogiorno* 3: 513.
- Osservatorio, C. N. A. 2018. "Comune che vai burocrazia che trovi, Rete Imprese Italia" Accessed from <https://www.cna.it/tag/osservatorio-cna-comune-che-vai-burocrazia-che-trovi/>.
- Peters, G. B. 2015. *Advanced Introduction to Public Policy*. Cheltenham: Edward Elgar.
- Piattoni, S. 2010. *The Theory of Multilevel Governance*. Oxford: Oxford University Press.
- Pierson, P. 1994. *Dismantling the Welfare State*. Cambridge: Cambridge University Press.

- Pollock, M. 1994. "Creeping Competence: The Expanding Agenda of the European Community." *Journal of Public Policy* 14 (02): 95–145. <https://doi.org/10.1017/S0143814X00007418>.
- Pollex, J. 2021. "Simultaneous Policy Expansion and Reduction? Tracing Dismantling in the Context of Experimentalist Governance in European Union Environmental Policy." *JCMS: Journal of Common Market Studies* 60: 1–30.
- Pollex, J., and A. Lenschow. 2020. "Many Faces of Dismantling: Hiding Policy Change in non-Legislative Acts in EU Environmental Policy." *Journal of European Public Policy* 27 (1): 20–40. <https://doi.org/10.1080/13501763.2019.1574869>.
- Pollex, J., and A. Lenschow. 2020. "Many Faces of Dismantling: Hiding Policy Change in non-Legislative Acts in EU Environmental Policy." *Journal of European Public Policy* 27 (1): 20–40. <https://doi.org/10.1080/13501763.2019.1574869>.
- Polverari, L. 2020. "La Capacità Amministrativa: Letteratura, Criticità e Un'agenda di Ricerca a Servizio del Policymaking." *Rivista Giuridica del Mezzogiorno* 3-4: 743–762.
- Pressman, J. L., and A. Wildavsky. 1973. *Implementation: How Great Expectations in Washington are Dashed in Oakland*. Berkeley: University of California Press.
- Radaelli, C. M. 2018a. 'EU Policies and the Europeanization of Domestic Policy-Making.' In *Handbook of EU Policies: Interpretive Approaches to the EU*, edited by H. Heinelt and S. Münch, 55–71. Edward Elgar.
- Radaelli, C. M. 2018b. "Half-way Through the Better Regulation Strategy of the Juncker Commission: What Does the Evidence say?" *Journal of Common Market Studies* 56: 85–95.
- Radaelli, C. M., and F. De Francesco. 2007. *Regulatory Quality in Europe: Concepts, Measures, and Policy Processes*. Manchester: Manchester University Press.
- Radaelli, C., and J. P. Salter. 2019. "Europeanization in Reverse Gear?" In *Differentiated Integration and Disintegration in a Post-Brexit Era*, edited by Stefan Gänzle, Benjamin Leruth, and Jarle Trondal, 36–53. London: Routledge.
- Ragusa, J. M. 2010. "The Lifecycle of Public Policy: An Event History Analysis of Repeals to Landmark Legislative Enactments, 1951–2006." *American Politics Research* 38 (6): 1015–1051. <https://doi.org/10.1177/1532673X10374170>.
- Rhodes, R. A. W. 1997. *Understanding Governance: Policy Networks, Governance, Reflexivity and Accountability*. Buckingham: Open University Press.
- Rodríguez-Pose, A. 2013. "Do Institutions Matter for Regional Development?" *Regional Studies* 47 (7): 1034–1047. <https://doi.org/10.1080/00343404.2012.748978>.
- Rodríguez-Pose, A., and M. Di Cataldo. 2015. "Quality of Government and Innovative Performance in the Regions of Europe." *Journal of Economic Geography* 15 (4): 673–706.
- Rodríguez-Pose, A., and E. Garcilazo. 2015. "Quality of Government and the Returns of Investment: Examining the Impact of Cohesion Expenditure in European Regions." *Regional Studies* 49 (8): 1274–1290.
- Rodríguez-Pose, A., and T. Ketterer. 2020. "Institutional Change and the Development of Lagging Regions in Europe." *Regional Studies* 54 (7): 974–986. <https://doi.org/10.1080/00343404.2019.1608356>.
- Sabatier, P. A., and D. Mazmanian. 1979. "The Conditions of Effective Implementation." *Policy Analysis* 5: 481–504.
- Schmitt, S. 2012. "Sequences of Active Policy Dismantling? Path Dependency in Pension Reform Processes." In *Dismantling Public Policy*, edited by M. W. Bauer, A. Jordan, C. Green-Pedersen, and A. Héritier, 56–80. Oxford: Oxford University Press.
- Steinebach, Y. 2022. "Administrative Traditions and the Effectiveness of Regulation." *Journal of European Public Policy* 30 (3): 1–20.

- Steinebach, Y., and C. Knill. 2017. "Still an Entrepreneur? The Changing Role of the European Commission in EU Environmental Policy-Making." *Journal of European Public Policy* 24 (3): 429–446. <https://doi.org/10.1080/13501763.2016.1149207>.
- Surubaru, N. C. 2017. "Administrative Capacity or Quality of Political Governance? EU Cohesion Policy in the new Europe, 2007–13." *Regional Studies* 51 (6): 844. <https://doi.org/10.1080/00343404.2016.1246798>.
- Terracciano, B., and P. R. Graziano. 2016. "EU Cohesion Policy Implementation and Administrative Capacities: Insights from Italian Regions." *Regional & Federal Studies* 26 (3): 293–320. <https://doi.org/10.1080/13597566.2016.1200033>.
- Tosun, J. 2014. "Absorption of Regional Funds: A Comparative Analysis." *JCMS: Journal of Common Market Studies* 52 (2): 371–387. <https://doi.org/10.1111/jcms.12088>.
- Van Meter, D., and C. Van Horn. 1975. "The Policy Implementation Process." *Administration & Society* 6 (4): 445–488. <https://doi.org/10.1177/009539977500600404>.
- Wilkinson, D., C. Monkhouse, M. Herodes, and A. Farmer. 2005. "For Better or for Worse? The Eu's "Better Regulation" Agenda and the Environment." *Institute for European Policy* 26 (3): 151–161.
- Wu, X., M. Ramesh, and M. Howlett. 2015. "Policy Capacity: A Conceptual Framework for Understanding Policy Competences and Capabilities." *Policy and Society* 34 ((3–4): 165–117. <https://doi.org/10.1016/j.polsoc.2015.09.001>.
- Xanthaki, H. 2014. "European Union Legislative Quality After the Lisbon Treaty: The Challenges of Smart Regulation." *Statute Law Review* 35 (1): 66–80. <https://doi.org/10.1093/slr/hmt005>.

Interviews

- Interview n. 1, public official Ministry for public administration, 14 July 2022
- Interview n.2, expert consultant, 22 July 2022
- Interview n.3, expert, 23 August 2022
- Interview n.4, expert, 22 July 2022
- Interview n.5, manager ARPA, 22 July 2022
- Interview n. 6, public official Lombardy Region, 10 May 2022
- Interview n. 7, public official Municipality of Milan, 22 May 2022
- Interview n.9, public official at Regional Agency for environment (Lombardy), 18 July 2022
- Interview n.10, public official at Regional Agency for environment (Piedmont), 19 November 2022
- Interview n.11, public official at Regional Agency for environment (Calabria), 19 November 2022
- Interview n.12, public official at Regional Agency for environment (Abruzzo), 19 November 2022
- Interview n.13, public official at Regional Agency for environment (Sicily), 19 November 2022