

# Series on Integrated Impact Assessment

## 1- Overall situation and clarification of concepts

March 2014

This briefing note is the **first** in a series of six focused on the state of the practice of integrated impact assessment (IIA). These documents focus, respectively, on:

1. **Overall situation and clarification of concepts**
2. Example of the practice of IIA at the European Commission
3. Example of the practice of IIA in France
4. Example of the practice of IIA in the United Kingdom
5. Example of the practice of IIA in Northern Ireland
6. Main challenges and issues tied to IIA

### Foreword

Integrated Impact Assessment (IIA) is a decision-support mechanism increasingly being considered by public administrations in industrialized countries. The movement toward the adoption of evidence-based policy has given rise to many forms of impact assessment, reflecting governmental priorities. The need to combine the various impact assessment tools which have multiplied over the years within governments arises from the desire to reduce the administrative burden associated with assessments and to ensure governmental coherence (Achnicht, Rennings, & Hertin, 2009; Radaelli & Meuwese, 2009).

The integration of impact assessment tools is also relevant to the public health sector. Indeed, at a time when the institutionalization of health impact assessment (HIA) within government apparatus is being promoted as a way to improve the health of Canadians (Keon & Pépin, 2008; Health Council of Canada, 2010; Canadian Nurses Association, 2012), it is essential that this new form of impact assessment be positioned within the context of government decision-making processes.

The series on IIA follows from a study conducted during the summer of 2012 at the request of the Government of Québec, which is exploring this issue. The objective of the study, carried out by the National Collaborating Centre for Healthy Public Policy (NCCHPP) on behalf of Québec's Ministère de la Santé et des Services sociaux (MSSS – the Ministry of Health and Social Services), was twofold: to examine the current state of the practice of IIA in Western countries, along with key issues, and to gather practical examples. The research methodology was based on two strategies: reviewing the literature and examining case studies. The review focused on scientific articles and the grey literature. This allowed us to identify government initiatives that could shed light on modes of governance and tools used to conduct IIAs, which could be relevant to the Canadian context.

This series is intended, firstly, for government actors from all sectors seeking knowledge about the practice of IIA, and also for public health actors who wish to learn more about integrating health concerns into the IIA process, as a means of supporting decision making.

This first note in the series briefly defines IIA and describes its origins. Then it provides an overview of the current state of practice, and presents the main findings that emerge from this overview. In addition, it clarifies certain concepts related to the practice of IIA. Indeed, given that IIA is still in its early stages and that it emerged from several schools of thought, it seems useful to closely examine the concepts underlying this type of impact assessment in order to inform the reader and remove any ambiguities about it.

### Definition and origins of integrated impact assessment

#### DEFINITION

The literature on integrated impact assessment (IIA) reveals that the concept can vary depending on the goal pursued by its users and the context



in which it is practised. Our preferred definition is the European Union's version, for it unites the main characteristics identified in the documents reviewed. Thus, IIA can be described as a type of impact analysis aimed at integrating all the intended and unintended effects (usually on the economy, society and the environment) of a new government intervention, all within a single conceptual framework. By means of factual and comprehensible data, it helps inform decision makers of the potential advantages and disadvantages of their proposals. IIA is an *ex ante* assessment, that is, it is carried out prior to decision making (Bailey et al., 2003; European Commission, 2012; Milner et al., 2005). It seeks to identify the possible consequences of implementing proposals, not only for the activity sector developing the proposal, but also more broadly, across other sectors (European Commission, 2012).

## ORIGIN

As stated above, IIA emerged from a desire to integrate the impact studies of various fields within a conceptually neutral analysis model. It fulfills a need for a tool that addresses two issues: how to develop better policies and how to reduce the administrative burden.

## DEVELOPING BETTER POLICIES

Developing better policies involves striving for policies based on consistent, clearly formulated evidence. The various sector-based impact assessment tools that have been developed in recent years provide decision makers at the executive and legislative levels of government with access to factual information; this in turn encourages informed decision making (Hertin et al., 2007). Several of these impact assessment tools also take into account the interactions between the draft policy under review and other existing regulatory or policy provisions, to identify and mitigate potential inconsistencies. In addition, in recent years, citizens have been increasingly vocal in demanding that government administrations be held accountable for their decisions. This situation encourages policy makers to be more transparent about the reasons justifying their policy choices (Bailey et al., 2003).

## REDUCING ADMINISTRATIVE BURDENS

The trend toward integrating the many types of sectoral impact analysis that, over time, have become mandatory (assessment of the impacts on the environment, health, equity, businesses, etc.) into a single process is gaining increasing momentum. The various assessments, each of which usually targets only one sector, tend to be overlapping, costly and redundant. Incorporating several dimensions within a single process facilitates the work of analysts and encourages communication among different departments (Achtinicht et al., 2009; Bond et al., 2001; Jacob & Hertin, 2007).

It is important to note here that some of the IIA processes currently being developed have their origins in a tradition of regulatory impact assessment (RIA) that is strongly rooted in many countries. This form of assessment is prompted by a desire to improve regulations by reducing their negative impacts on businesses and citizens. Streamlining regulatory processes often referred to as "smart regulation" and "cutting the red tape," has been practised in the majority of Organisation for Economic Co-operation and Development (OECD) countries since the 2000s. In some countries, like the United Kingdom, RIA laid the foundation for IIA<sup>1</sup> (Achtinicht et al., 2009).

## State of the practice

### DEGREE OF INTEGRATION

It is possible to observe two trends within the practice of integrated impact assessment: one that can be qualified as 'weak' integration and another that can be qualified as 'strong' integration (Bond et al., 2001). The weak form of integration involves carrying out sectoral impact assessments independently of each other. It is possible to synchronize the processes, but the results of the various impact assessments are then viewed individually and may be given unequal consideration during the decision-making process. Under the strong form of integration, environmental, social, economic and other impact assessments are integrated throughout the analysis process. Decision makers are thus provided with a single overall assessment to guide their choice. This trend can be observed in the relatively frequent attempts to

<sup>1</sup> For more detailed information about smart regulation, IIA and the state of their practice in the world, see Kirkpatrick and Parker (2004); for Canada and its provinces, see Redmond et al. (2011).

integrate the assessment of health impacts and environmental impacts into a single process (see, for example, Simos and Arrizabakaga, 2006).

## COUNTRIES

IIA practice first developed in what would be referred to as the weak form. Given the difficulty of synchronizing the different analysis processes and, above all, due to the disparity among their underlying methods and paradigms, practice subsequently shifted toward an approach that could be qualified as strong (Bond et al., 2001). However, the strong form of the practice is not widespread. Among industrialized countries, the most cited examples are found in Europe. Although we were able to find studies reporting on the examples of Germany, the European Commission, France, Northern Ireland, the Netherlands, Poland, the United Kingdom and Switzerland, we also found that a gap frequently exists between the practice described and the principles of IIA (which call for equal consideration of multiple sectors). Regarding implementation, the examples of France, the European Commission, the United Kingdom and Northern Ireland seemed most relevant to us.

IIA began to be practised in France relatively recently, having been introduced in 2009 under the impetus of an organic statute (i.e., derived from one of France's foundational laws). The examples of the European Commission and the United Kingdom are better known and have been the subject of several studies. Thus, they provide useful information regarding methods of operation. The case of Northern Ireland provides an example of IIA promoted on a voluntary basis. These four examples are described in detail in the 2nd, 3rd, 4th and 5th briefing notes in this series.

At this point, it is worth noting that regulatory impact assessment (RIA) is considered to be IIA's precursor. RIA was greatly popularized, beginning in the late 1990s, by the OECD, which promotes it as a way to "improve policy coherence and promote economic welfare through better quality regulation" (Organisation for Economic Cooperation and Development [OECD], 2009). Today, the use of RIA is widespread in most industrialized countries. As mentioned above, some governments have broadened the range of effects analyzed within the context of RIA practice, considering more than just the consequences for businesses. For example, the United Kingdom shifted from RIA focused on

businesses, which it had established in 1998, to a broader form of RIA in the early 2000s, finally opting for integrated impact assessment (impact analysis) in 2007 (National Audit Office ([NAO], 2009). Researchers have observed that an emphasis on reducing the regulatory burden on businesses remains dominant within the current practice of IIA and that the tools used in its application, such as the method for calculating the reduction of administrative burdens, known as the "SCM" (Standard Cost Model), are less adapted to the inclusion of other perspectives (Jacob & Hertin, 2007; Jacob et al., 2008).

Just as the OECD can be said to have spurred on the use of RIA in industrialized countries, the European Commission can be said to have played this role with respect to IIA within Europe. The Commission implemented this assessment system in 2003 and it remains the most formalized practice of IIA to date (De Smedt, 2010). This initiative, which arose at the European level, influenced the member states, and is referenced by several European Union countries (Hertin et al., 2007). The system established by the European Commission combines two strategies for improving public policy. The first centres on sustainable development, which ensures a balance between economic, social and environmental development. The second constitutes the Better Regulation program (Watson et al., 2007). This program, derived from the tradition of RIA, aims to simplify legislation and reduce administrative burdens on businesses caused by regulation, achieving these through *ex ante* and transparent impact assessments. Thus, the IIA system introduced by the European Commission is focused on meeting two types of objectives: sector-based objectives, related to the specific sector generating the draft policy, and broader governmental objectives.

## Main observations

In carrying out this study, we often observed that there is a gap between formal guidelines and practice. Based on the existing practices described in this series and on the review of the literature, it is appears that the ability to concretely integrate the various dimensions of impact within a single analysis model is dependent upon several factors. We have identified three: the governmental vision underlying the assessment mechanism, strong

institutionalization of the mechanism and the use of inclusive analysis tools.

### THE UNDERLYING VISION

The first factor stems from the vision and objectives of governmental authorities. When the mechanism is intended to be inclusive and is aligned with the government's overarching goals, a balanced treatment of varying types of impacts is more likely to be achieved. IIA mechanisms structured around the three "pillars" of sustainable development (social, economic and environmental development), such as those of the European Commission and Northern Ireland (see forthcoming notes 2 and 5 of this series), seem better suited to resisting the tendency to subordinate environmental and social aspects to economic imperatives.

### STRONG INSTITUTIONALIZATION

The second factor associated with success is strong institutionalization of the impact assessment mechanism. The most highly developed examples of IIA bring into play a set of interconnected and clearly explained administrative structures and processes that guide practice. Senior levels of government are centrally involved with such mechanisms. Strong central leadership, the production of adapted practical guides, training and access to information resources are some of the measures implemented by governments who are more strongly committed to this approach. Two government initiatives described in this series deserve to be highlighted here. One is the European Commission's (see forthcoming note 2) systematic creation of inter-service steering groups for each IIA, at the start of the legislative development process. Under the procedure established by the European Commission, the Directorates-General are required to form a multi-disciplinary team, composed of representatives from the sectors that could be affected by a new proposal, in order to guide its IIA. This strategy encourages a cross-cutting view of subjects and supports the development of some form of governmental consensus. The second noteworthy government initiative is the United Kingdom's series of successive evaluations of the quality of the practice, carried out by the National Audit Office (National Audit Office, 2009, 2010) (see forthcoming note 4). These made it possible to closely monitor the evolving quality of the impact assessments carried out in different departments and to propose improvements. One of their studies also pointed out the incentive effect of these external evaluations on

the willingness of departments to comply as fully as possible with government requirements (NAO, 2010).

### INCLUSIVE ANALYSIS METHODS

A third factor, tied in with the previous one, relates to the preferred analysis methods. This is the aspect of IIA mechanisms that generates the most discussion. Cost-benefit analyses are very useful, but are also criticized for their inability to accurately assess impacts that are difficult to quantify or to associate with a monetary value. Searching for a balance between the use of quantitative and qualitative methods and among multiple dimensions to include economic social and environmental considerations remains a constant challenge. At issue is the credibility of the process, which in turn affects how the results of the IIA might influence decision making.

## Conclusion

To summarize, it is still uncommon to find IIA practised in its integral form. Its implementation may be influenced by the traditional practice of RIA, which has a tendency to be strongly influenced by the perspective of economic efficiency. IIA practice can also be guided by a broader governmental vision aimed at integrating the major policy areas, namely, the social, environmental and economic sectors, which influence life in society. In all cases, strong institutionalization, which includes well-established internal mechanisms and capacity building, is required.

Note 6 of this series on IIA will provide more detail about the various challenges and issues associated with this practice.

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## APPENDIX

### TYPES OF IMPACT ASSESSMENT WITH SOME POTENTIAL FOR INTEGRATION

Aside from IIA itself, it is worth mentioning the efforts that have been made to integrate various existing forms of sectoral impact assessment. The environmental, public health and economic sectors have each developed their own impact assessment tools. Given that these sectors draw on integrative concepts, their analytic tools tend to produce more or less cross-cutting and intersectoral perspectives. Six types of impact assessment that embody a certain degree of integration are described below. Table 1, which follows, provides a summary and presents a taxonomy of different forms of impact assessment that include some degree of integration.

#### Regulatory impact assessment (RIA)

This type of impact assessment is very widespread in industrialized countries. This instrument is primarily concerned with the impact of regulation on businesses. Introduced in the 1970s, regulatory impact assessment was specifically designed to estimate the economic costs and benefits of new regulations for businesses. Its use increased during the 1980s and 1990s, driven by the need to ensure an environment conducive to commercial competitiveness, given the context of market globalization (Achnicht et al., 2009). Its practice then expanded to include analysis of the impact of regulations on the administrative burden of businesses, giving rise to a concern for regulatory relief. It is characterized by its systematic approach, well-integrated into legislative and regulatory development processes. In recent years, there has been a broadening of the range of dimensions analyzed, with interest extended to the unintended consequences of a bill or regulation, such as distributive effects and indirect costs. Such a broadening of focus has paved the way for more integrated impact assessment (NAO, 2007; Staronova, 2007).

#### Integrated environmental impact assessment (IEIA)

This type of impact assessment is aimed at considering, analyzing and interpreting the aspects of a project likely to harm the physical environment, ecosystems, resources and the quality of life of living beings (McCaig, 2005). Integrated

environmental impact assessment builds on the environmental focus, integrating social, economic and health concerns tied to the development of a project. It represents an evolved form of environmental impact assessment, whose initial scope has proven too limited because it tends to produce a fragmented view of potential impacts. Over time, concerns about human health (Human Impact Assessment) (Bailey et al., 2003) and social impacts (Social Impact Assessment) (Vanclay, 2003) have been integrated. IEIA is a systemic approach that focuses not only on the social impacts of environmental change brought about by a project, but also on harmful effects on the environment that, in turn, can be caused by these social changes. This analysis of “second level” changes (Abaza et al, 2004) makes it possible to anticipate the indirect and long-term effects of development projects (Briggs, 2008; Versluys, 2006). Although environmental impact assessment is now well-established in the vast majority of industrialized countries, its integrated form is not frequent and its practice varies greatly depending on the cultural and institutional contexts in which it is implemented. The use of an independent body to allow for public consultation on proposals, as found in British Columbia and Québec, ensures, to some extent, an integrative vision.

#### Strategic environmental assessment (SEA)

This type of assessment differs from integrated environmental impact assessment in that it occurs upstream, at an earlier stage of a project's development, when the main strategic choices and orientations have not yet been determined. While environmental impact assessment applies to projects originating from both the private and public sectors, strategic environmental assessment applies only to government policies and programs likely to have an environmental impact. Through its proactive approach, it generates discussion about the purpose of and need for a specific project within the context of other government decisions in the same policy sector, while examining a wider range of development options (Bailey et al., 2003). This practice is particularly prevalent in European countries, which are subject to the directives of the European Union in this area (Crowley & Risse, 2011). In Canada, some provinces have also made strategic environmental assessments mandatory (Noble, 2004).



### **Sustainability impact assessment**

This type of analysis is a relatively recent development. Its emergence coincides with the establishment of sustainable development strategies formulated in recent years by many governments (Bond et al., 2012). Sustainability impact assessment, which focuses on the three “pillars” of sustainable development, namely, its social, economic and environmental components, measures these impacts using a single procedure, and is less restrictive than environmental impact assessments. Sustainability impact assessment takes into account cross-sectoral and somewhat intangible considerations. Some aspects of strategic environmental assessment are conceptually very similar (Crowley and Risse, 2011; OECD, 2011). However, unlike the latter, sustainability impact assessment is not applied only to government policies and programs that could have a significant impact on the environment, but rather to all government projects and activities, with the aim of integrating the principles of sustainable development into the government’s planning and decision making processes (Office fédéral du développement territorial [ARE], 2004). Thus, “sustainability means that all three sustainable development aspects are fully integrated into the assessment” (OECD, 2011, p. 4). Sustainability impact assessment must therefore identify the necessary trade-offs between the economic, environmental and social objectives of government policies and programs. Again, long-term effects are considered, in addition to short-term effects (OECD, 2011; ARE, 2004). The practice of sustainability impact assessment was instituted by the European Commission in 2001 and was incorporated into integrated impact assessment in 2003. In Switzerland, sustainability impact assessment fulfills, to some degree, the role of integrated impact assessment at the federal level, since it must include in its analysis the appropriate sections of the various sectoral impact assessments provided for by the management framework (ARE, 2004). This form of impact assessment still seems rarely to be carried out with a view to influencing government decision making (Bond et al., 2012).

### **Social impact assessment**

This type of assessment involves the process of analyzing the positive and negative social consequences of an intervention. Its objective is to bring about a more sustainable and equitable

biophysical and human environment (Vanclay, 2003). This form of analysis was developed within the field of environmental impact assessment with the same intent as mentioned above, namely to extend the range of potential impacts to examine when studying a project. It was introduced in response to pressure from communities whose quality of life is greatly influenced by cultural factors. Cultural dimensions are particularly relevant when considering the effects of projects on Aboriginal communities and in developing countries. Although at present it is rarely applied outside of the context of environmental impact assessments, social impact assessment remains an analytical framework that bears interest for government decision making. It sheds relevant light on less tangible consequences, such as the distribution of impacts among population subgroups, human rights, historical and cultural contexts and community values (Esteves et al., 2012).

### **Health Impact Assessment (HIA)**

HIA is a form of impact assessment aimed at estimating the potential consequences of a proposed project or policy on population health and its determinants. It is intended to highlight unintended consequences on population health of non-health sector policies. It arose within the context of environmental impact assessments, but took root in the 1990s as a strategy for supporting the development of healthy public policies at all levels of government decision making (Kemmer, 2001). It is informed by a holistic view of health action, which leads to consideration of all the determinants of health, be these social, economic, physical or individual. Among its guiding principles is the reduction of social inequalities of health and its primary objective is to assist policy makers in maximizing the positive and minimizing the negative effects of their proposals on health (European Centre for Health Policy, 1999, Forsyth et al., 2010; Milner et al., 2005). Over the last decade, the use of HIA has grown significantly on all continents of the globe (Blau et al., 2007; Wismar, 2004). Although mainly used at the level of local governments, its institutionalization within core public administrations is increasingly being considered due to its active promotion by international organizations such as the World Health Organization.

**Table 1: Taxonomy of different forms of impact assessment with some potential for integration**

<b>Name</b>	<b>Objects assessed</b>	<b>Impacts assessed</b>	<b>Characteristics</b>
<b>Integrated impact assessment</b>	Policies Any governmental decision that have significant economic, social and environmental impacts	Economic, social (including health) and environmental dimensions.	Analytical framework that integrates all dimensions; intended and unintended consequences. Not widely used.
<b>Regulatory impact assessment</b>	New regulations	Impact on businesses and economic activity.	Systematic approach integrated into policy development processes. Widespread use.
<b>Integrated environmental impact assessment</b>	Projects	Impact on the environment, ecosystems, resources, quality of life of living beings.	Takes into account impacts on human health and social impacts, in addition to environmental impacts, and examines their interactions.  Short- and long-term impacts. Not widely used.
<b>Strategic environmental assessment</b>	Policies, programs, strategies	Social, economic and health dimensions tied to the environment.	Enables consideration of a specific project in a wider development context. Long-term impacts. Widespread use.
<b>Sustainability impact assessment</b>	Governmental decisions	Sustainable development dimensions (economic, social, environmental) in an integrated manner.	Integrated approach supporting a long-term perspective. Arbitration between the effects of the three dimensions. Used in Switzerland.
<b>Social impact assessment</b>	Projects	Impacts on broader social elements such as inequality, human rights, culture, heritage, etc.	Applied especially in the context of environmental impact assessments of projects planned for sensitive cultural environments.  Short- and long-term impacts. Not widely used.
<b>Health impact assessment</b>	Policies, projects	Social, economic and environmental determinants of health and social inequalities of health.	Relies on an intersectoral approach. Short- and long-term impacts. Widespread use.

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