

# Accountability in Global Environmental Governance: A Meaningful Tool for Action?

*Teresa Kramarz and Susan Park\**

## Abstract

Global environmental governance (GEG) is characterized by fragmentation, duplication, dispersed authority, and weak regulations. The gap between the need for action and existing responses has led to demands for accountability. This has created a paradox: accountability mechanisms to improve GEG have proliferated while the environment deteriorates. We offer a two-tier explanation for this paradox. First, actors establishing GEG are not held to account for the design of their environmental interventions. Biases in public, private, voluntary, and hybrid institutions, which shape goals and determine what to account for and to whom, remain unexamined. Second, efforts to establish accountability focus on functional requirements like monitoring and compliance, leading accountability to be viewed as an end in itself. Thus, complying with accountability may not mitigate negative environmental impacts. The utility of accountability hinges on improving governance at both tiers. Turning the accountability lens to the goals of those designing environmental institutions can overcome the focus of justifying institutions over environmental problems.

Global environmental governance (GEG) has burgeoned amidst ongoing deterioration of the environment. The problems with GEG are widely known: the system is fragmented, with duplicated efforts, dispersed political authority, and weak regulatory influence. Fingers point to a culture of unaccountability as being partly responsible (Najam and Halle 2010), although accountability remains underanalyzed (Biermann and Gupta 2011). Despite this, considerable efforts have been made to make GEG accountable through greater transparency, the provision of justification and reasoning for governance decisions, and monitoring and evaluation efforts. This has led to a paradox: processes for holding those governing the global environment to account have grown, while environmental deterioration continues across a range of indicators.

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For accountability to become a meaningful tool of environmental action, it must be applied to the goals of the multiple actors engaged in the public, private, voluntary, and hybrid institutions that comprise GEG. Authority holders, or those governing the environment, are guided by different goals that determine to whom and for what to account, and this influences the framing of environmental priorities and how accountability is measured. The theoretical framework argues that public, private, voluntary, and hybrid governance institutions prioritize goals such as responsiveness to constituencies, economic benefit and profit, and moral value, which influence the design and execution of GEG and its accountability mechanisms.<sup>1</sup>

It is imperative, therefore, to consider two tiers of environmental governance: the design of institutions and the execution of interventions. Otherwise, authority holders can be held to account for their actions without necessarily mitigating negative environmental impacts. Specifically, authority holders are held accountable to existing governance institutions that pursue goals such as short-term economic gains over environmental ones, because those establishing GEG are not held to account for the first tier of governance, where problems are framed, priorities identified, and solutions devised. While scholars are aware of competing and conflicting interests in bringing authority holders to account (see, e.g., Koppell's 2005 multiple accountability disorder), they have not linked the goals of actors to the design of environmental institutions, focusing instead on the execution of discrete interventions. The practice of accountability in GEG therefore privileges an "end-of-pipe" application of accountability rather than investigating whether, for what, and to whom those in authority were answerable in designing governance institutions.

The dual hope of environmental accountability is that it will improve problem-solving as well as responsiveness to the stakeholders affected by environmental problems, although there may be tensions in addressing both concerns. One example of the failure to integrate accountability is the displacement of resource-dependent communities in the name of conservation, without any accountability to these populations for the decisions that produced their marginalization (Chapin 2004). In the absence of a "process-integrated" application of accountability, competing goals and agendas are not publicized, debated, and agreed on when institutions are created. The overwhelming preference for applying accountability solely to functional, end-of-pipe concerns like verification, measurement, and compliance ultimately risks doing little to protect the global environment.

1. We make a constitutive argument that actors espouse goals that become socially accepted and formalized through public, private, and voluntary institutions, creating systems of governance. Public, private, and voluntary systems of governance have their own logics that determine how problems are framed and how those in authority devise the attendant accountability procedures. Individuals within these systems may act against those goals (for example, for personal enrichment) but are limited by their roles as to what is socially acceptable (Schillemans and Busuioc 2015, 194).

This article is structured in two parts. First, we examine the nature of the accountability mechanisms that have grown alongside the continued deterioration of the environment. Second, we develop a theoretical explanation for why more accountability will not produce a better environment: holding actors accountable for the execution of specific interventions is not enough; instead, the goals of those governing the environment must be scrutinized when public, private, voluntary, and hybrid institutions are designed. We conclude by hypothesizing that shifting the focus of accountability to encompass those designing as well as those executing environmental governance can restore value to a concept and instrument that has been of limited utility in GEG.

### **The Paradox: More Accountability Without More Environmental Benefits**

Declaring GEG unaccountable, Najam and Halle (2010) provide an entry into the debate over the utility of accountability. We recognize many of their concerns, but argue that the issue is not one of a lack of accountability, but of how accountability mechanisms are designed and, as we argue throughout, for what purpose. Accountability procedures are designed to ensure that authority holders are responsible and answerable for their actions within the governance institution's goals. Najam and Halle identify this in relation to multilateral environmental agreements (MEAs), but we need to interrogate the design of new institutions (and the retrofitting of old ones) by state and nonstate actors alike. Institutions are continually being created to mitigate environmental problems, with accountability procedures to assess their effectiveness. Environmental accountability must go beyond evaluating whether authority holders are responsible and answerable for their actions within these institutions, to hold them responsible and answerable to the environment and to primary stakeholders.

The proliferation of GEG accountability procedures is in keeping with broader trends toward declarations of accountability in global governance (Held and Koenig-Archibugi 2005). GEG is awash with what different actors claim to be accountability mechanisms that aim to increase transparency, lay out actors' justifications and reasoning for their governance decisions, and monitor and evaluate governance efforts (Ebrahim and Weisband 2007, 3–5). Authority holders thus seek to establish that they are responsible and answerable for their remit in governing the environment.

First is the rise of transparency by all actors in GEG to enable scrutiny (Gupta 2010). This is increasingly evident before, during, and after MEA negotiations. It is also apparent in the willingness of corporate and voluntary actors to provide public reporting on their activities (on nonstate holders of authority, see Cashore 2002). Voluntary actors such as environmental nongovernment organizations (ENGOS) have been asked to explain their "financial practices, partnerships and methods" (Balboa 2015, 159). The rising focus on transparency is

also manifested in various initiatives, such as the Global Reporting Initiative and the Carbon Disclosure Project.

Second is the increase of environmental actors' providing the justification and reasoning for their decisions. Evident across various media through which authority holders explain their decisions, the most tangible evidence is the formalizing of deliberative decision-making models in the Forest Stewardship Council and the Marine Stewardship Council (on the latter, see Gulbrandsen and Auld's contribution in this issue). Authority holders increasingly engage in providing justification and reasoning as an integral part of how they govern.

Third is the burgeoning of efforts to assess compliance through monitoring and evaluation, particularly by intergovernmental organizations (IOs). For example, the World Bank, which has a large environmental impact, has its independent evaluation group and internal units such as the quality assurance group to evaluate its environmental impact. Corporate actors have also been challenged to provide evidence of their compliance with voluntary standards such as the UN Global Compact. The ISO 14000 series now dominates such efforts, including environmental auditing. However, internal procedures remain difficult to assess (e.g., the project finance industry through the equator principles). Meanwhile, ENGOs are required to be financially accountable to the state while holding each other to account for voluntary professional standards (Balboa 2015, 162).

As this brief review demonstrates, what is problematic is not the absence of accountability initiatives, but the continued deterioration of the environment despite their growth. Thus, prescribing more accountability mechanisms is not necessarily better and will not necessarily reduce environmental degradation. Najam and Halle (2010) recognize this by stating that such initiatives are selective and partial, but we question whether this is a failure of the accountability mechanisms themselves, or whether such an "accountability paradox" is best explained by examining two tiers of governance: the original design of GEG and the execution of GEG to which accountability procedures have been applied. For example, recent studies such as Gulbrandsen and Auld's (this issue) demonstrate that having formalized justification and reasoning processes in GEG is no indication that those designing the process were held to account when they did it. Indeed, these studies demonstrate that not being accountable when designing nonstate certification schemes, even those with justification and reasoning processes, can still lead to problems of accountability when operationalizing certification. As we argue below, tracing accountability from the design tier to the execution tier is essential for accountability to be a meaningful tool for environmental action.

Some scholars have questioned the utility of accountability in GEG. For example, Lohmann (2009) claims that interventions such as carbon accounting and cost-benefit analysis create black boxes of measurement, which are ill-conceived for attending to the complexity of global environmental problems. Accountability procedures tacked onto environmental interventions produce noncommensurable categories that create perverse incentives for credit seekers and provide political

clout to blend fundamental differences in localities, actors, and issues in a Weberian drive to “to make an uncertain, complex, nonlinear, largely unpredictable world amenable to management and governance” (Lohmann 2009, 514). For instance,

carbon accounting’s indifference to where or how emissions cuts are made discourages attention to path dependence, positive feedbacks and innovation; its conflation of reductions and offsets leads to a running together of probability with uncertainty, ignorance and indeterminacy; and its focus on means of achieving short-term efficiency obstructs social thinking about long-term directions and the drawbacks of having to monitor geographically distant effects (Lohmann 2009, 530).

Lohmann identifies the gap between governance instruments and the desired environmental outcomes, but this does not explain the variance in the impacts of accountability instruments.

Yet demands for accountability continue because accountability procedures do not respond to environmental stakeholders expectations (those affected by environmental problems and those that claim to speak for the environment). This failure is twofold. First, despite the proliferation of GEG and the attendant accountability procedures, the environment continues to deteriorate across nearly all indicators (United Nations Environment Program [UNEP] 2007). This is a widely recognized failure of “outputs,” leading many to question whether those in authority are being held to account for governing the environment or whether we need more or better accountability. The second reason why there has been an increase in the desire by policy-makers, individuals, and institutions for greater accountability is based on input accountability or the continuing demand by different actors to shape decisions for governing the global environment (Chan and Pattberg 2008; Chesterman 2008). These issues are addressed in turn.

First, widespread calls for accountability are based on *output* accountability, or the demand that those governing be answerable and responsible for not delivering on their aim to mitigate the human impact on the biosphere (the conflation of environmental outputs such as meeting emissions targets and the resultant outcome for the environment is discussed below). Output accountability is the “oversight of operations, or accounting for results or impacts” (Davenport and Low 2013, 88–89). NGOs push states to be held responsible for their environmental impact and advocate for binding agreements to limit environmentally damaging behavior through international negotiations. Once such agreements have been concluded, NGOs (and corporations) seek to hold states accountable for meeting the agreed standards. While corporations are held to account through national regulations, NGOs have also demanded that corporations recognize their environmental footprint and that they be answerable for it. NGOs then monitor whether private actors comply with (usually industry-set) standards.

Assessing the compliance of those governing the environment is one component of accountability. GEG remains weak in the use of enforcement or sanctions

(to punish a lack of transparency, answerability, or compliance). Output accountability remains a challenge because, as we outline below, accountability procedures prioritize other normative goals such that environmental outcomes are subsumed. The solution is not to expand the concept of accountability to address all GEG limitations but to illuminate how accountability can be a useful tool for meaningful environmental action by applying it to the design and execution of GEG.

The ongoing demand for accountability in GEG is based on the assumption that holding those governing to account will improve governance outcomes. Evidence is still required to support the argument that any kind of accountability measure has a positive effect on GEG. To date, the evidence on environmental accountability has shown mixed results at best (Larrinaga-Gonzalez and Bebbington 2001). There is a tendency to equate accountability mechanisms, understood as mostly public renderings on transparency, answerability, compliance, and sanctions, with improving effective environmental action. Yet, in the modern, bureaucratized state system upon which the international system is built, we are surrounded by examples of accountability arrangements that do not achieve attendant environmental benefits. For example, a proliferation of state-regulated protected area systems provide for legal accountability mechanisms that do not necessarily translate into conservation of the species they were designed to protect (Kramarz 2013). The accountability mechanism can identify whether actors are being held to account for meeting their stated aims, but to understand how and why particular accountability mechanisms were devised we need to analyze the goals of particular governance institutions.<sup>2</sup>

The second reason why there has been an increase in the demand by policy-makers, individuals, institutions, and ENGOs for greater accountability in GEG is based on *input* accountability (Chan and Pattberg 2008). This is in line with broader demands for global governance to be more responsive and answerable for *how* decisions are made, including determining who can hold authority holders to account. For much of the last decade, global governance has been described as having a “democratic deficit,” where decisions are made absent connections back to the “public” (Held and Koenig-Archibugi 2005). Demands for greater input accountability have challenged IOs that were only accountable to their member states, absent transparent decision-making processes. With a shift toward globalization, international decisions were increasingly felt locally, particularly as a result of transnational private governance (Dingwerth 2008). Pushback from groups in global civil society led to greater IO transparency and hotly contested debates over the power of private interests in international regulation. In reaction to ENGOs’ highly visible role, the voluntary sector also came under fire for being unaccountable (Balboa 2015).

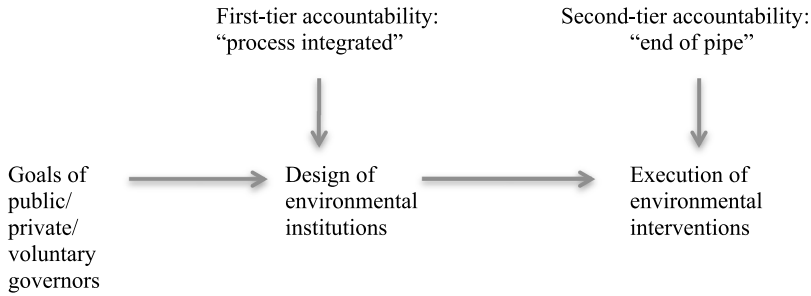
2. Moreover, those in authority may not be interested in whether accountability mechanisms work, as per the “forum model” (Schillemans and Busuioac’s 2015).

Increasing participation in governing the environment may lead to better environmental outcomes (Dingwerth 2008). However, accountability is a tool that can only hold those governing the environment responsible and answerable for their actions within the context of preexisting institutions. As with democratic processes, accountability procedures are not inherently pro-environmental. Input accountability is structured differently in public, private, and voluntary (and hybrid) governance institutions, with different values placed on open and participatory decision-making. A common feature across these governance institutions is the subordinate value placed on the environment. This is so even for hybrid governance institutions, such as public-private or public-voluntary arrangements designed to address environmental problems.

### **Accountability for Environmental Governance Goals: A Framework for Analysis**

The theoretical framework outlined here views accountability as a tool for improving environmental governance, leading to better environmental benefits. Establishing accountability procedures includes identifying what the object is for holding people to account, such as mitigating environmental damage, as well as how they should be held to account, through transparent standards of assessment. Yet identifying such procedures does not explain why accountability mechanisms may fail to make an impact. Accountability is a limited tool for improving the environment through better governance because authority holders may point to accountability procedures (transparency, justification and reasoning, monitoring and evaluation) as leading to outputs (labeling standards, treaties, conventions, protocols) but not necessarily to outcomes (preventing or mitigating harm, decelerating desertification, reversing CO<sub>2</sub> trends). While there is difficulty identifying how environmental outputs may lead to better environmental outcomes, the failure of existing accountability procedures can be traced to the goals of GEG.

Central to our argument is the recognition that actors have different goals, which delimit the options considered when designing environmental institutions and the types of interventions deemed appropriate. The “goals” are the main purpose of the governance institutions, with corresponding responsibilities to target audiences. These have a constitutive effect on actors’ understandings of the purpose of accountability (Searle 1995). Constitutive norms and rules “create new actors, interests, or categories of action,” while regulative norms and rules “order and constrain behavior” (Finnemore and Sikkink 1998, 891). Goals generate accountability procedures that regulate processes, standards, and sanctions, which are the regulative rules or the “means” of accountability. Every governance choice involves bias. Investigating those biases, including whether those designing public, private, voluntary, and hybrid institutions are accountable brings us closer to realizing accountability as a meaningful tool for action.



**Figure 1**

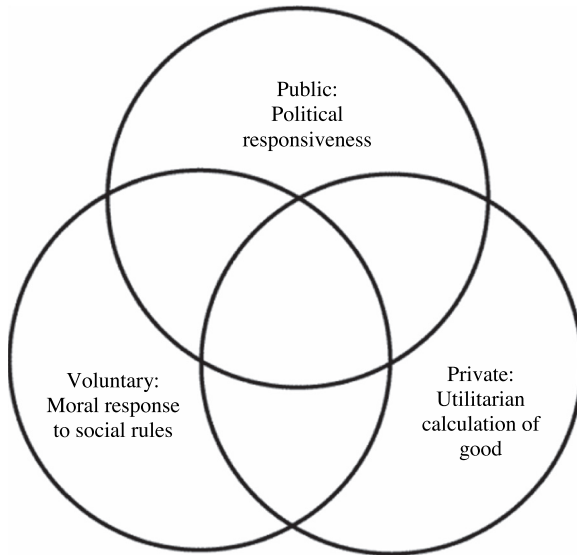
Applying Accountability to the First and Second Tiers of GEG

Goals influence how different actors are held responsible in environmental institutions, which determines how their actions are rendered to a relevant community at two “tiers.” The first tier is the original design of governance institutions, where problems are framed, priorities identified, and solutions devised. This opens up a set of interrelated questions: Who gets to choose the approach for addressing an environmental problem? What biases animate these choices? To whom are actors accountable in prioritizing certain goals? For example, to whom were the proponents of the UN Global Compact accountable when they assumed that norms could trump self-interest (Chesterman 2008, 47–48)? To whom is Conservation International accountable for promoting a hotspot approach to conservation? Or the World-Wide Fund for Nature (WWF) for supporting a Forest Stewardship Council (FSC) standard of certification over others (Cashore 2002, 507)? What are the intrinsic goals of these institutions, and where is the accountability for choosing these goals?

The second tier of GEG is the execution of environmental interventions. The accountability literature concentrates on whether authority holders are transparent, provide justification and reasoning, include monitoring and evaluation procedures, and are compliant with their aims in relation to the execution of specific interventions (or whether actors do what they are supposed to do). We liken our distinction between the first and second tiers of GEG to “process-integrated” versus “end-of-pipe” types of environmental approaches. The former relies on *ex ante* approaches—in the design stage of environmental governance, such as processes of clean production—while the latter relies on *ex post*—in the execution stage of environmental governance (Fig. 1). For accountability to be a meaningful tool for action, it must be applied to both tiers, as they are intrinsically linked.<sup>3</sup>

3. The “promise of accountability” is that “governance can be enhanced by facilitating or requiring account giving behavior” through accountability mechanisms, including “promoting behavior driven by the expectations of relevant and significant others” (Dubnick and Frederickson 2011, 17). We argue that this should run through both the design and the execution of GEG, rather than be limited to verification, measurement, and compliance.





**Figure 2**  
Public, Private, and Voluntary Logics of Environmental Governance

We map how the first and second tiers of GEG interact across three ideal governance institutions: public, private, and voluntary (Chan and Pattberg 2008, 105; Mashaw 2006).<sup>4</sup> This is important because the proliferation of institutions “based on private authority, private regimes, or some mix of public and private actors” (Risse 2005, 166) has led some to argue that other types of accountabilities exist beyond public accountability, where “market” and “voluntary” accountability have different standards, procedures, and sanctions (Mashaw 2006). We adapt a map of accountability first described by Dubnick and Justice (2004) to highlight how these institutions have distinct logics of action (Fig. 2). In *public* systems, what counts as accountability is being answerable to an electorate or political community for protecting the public good; in *private* systems, what counts is providing economic benefits to consumers and shareholders; in *voluntary* systems, what counts is upholding or diffusing agreed-upon moral standards of conduct among self-selected, like-minded individuals. These are the goals of the governance institutions we investigate.

Consequently, actors internalize a need to act and render an account of their actions based on bureaucratic, utilitarian, or moral standards. Understanding the motivations for accountability that animate different authority holders,

4. In keeping with the GEG literature, we differentiate between “public” and “private” governance instead of the “state” and “market” actors discussed elsewhere. We also use the term “voluntary sector” rather than “social” or “society,” because we identify the role of collective actors that are not beholden to the state or of private actors acting voluntarily within society, and all sectors have their own socially accepted standards of behavior.

and where if at all the environment appears in those motivations to account (subsumed by political, economic, and moral preferences), can reveal important governance dysfunctions and, ultimately, failures to curb environmental degradation of the earth's systems.

These categories, like all ideal types, do not describe the complexity of GEG. A decreasing number of institutions fit neatly into a single category. As Figure 2 suggests, GEG initiatives involve hybrid institutions that create more complexity for understanding accountability relationships and responsibilities for effective environmental action (we do not see governance as necessarily progressing from one type to another, as do Chan and Pattberg 2008, 108). Gulbrandsen and Auld's article in this issue, on certification schemes in the Marine Stewardship Council (MSC), examines governance institutions that straddle voluntary and private types. Gordon's article (also this issue) analyzes cities demanding accountability for climate governance, which straddles public and voluntary governance. Balboa's contribution to this issue, on the accountability of environmental impact bonds, straddles traditional public and private governance. Public, private, and voluntary governance categories are useful for distilling principles of accountability for different types of institutions. They are also useful for mapping the types of accountability to which hybrid arrangements adhere. Although hybrid institutions straddle more than one type of governance, they tend to prefer particular goals that shape not only what they are accountable for, but also how.

Different accountability procedures meet the goals of the three institutional types. To distill the relationship between the goals, which shape the designs of institutions and the execution of environmental interventions, we examine six standard accountability questions: who is being held to account? to whom is accountability owed? for what are they accountable? what process demonstrates accountability? what standards does an agent use to demonstrate accountability? and what happens when the agent fails to meet these standards? (Mashaw 2006, 118). A summary of the discussion may be found in Table 1.

### *Public Accountability*

Because states remain the primary holders of authority, public accountability is the default setting for discussions of responsibility and answerability for environmental degradation. States' goal is to represent the demos within sovereign states. A call for public accountability is "to express a belief that persons with public responsibilities should be answerable to 'the people' for the performance of their duties" (Dowdle 2006, 3). Public officials are held to account through democratic elections and bureaucratic procedures, although these processes are problematic (Rubin 2006, 76–77). Elected officials and bureaucrats respond to public demands for curbing environmental degradation and for establishing and upholding legislation and international agreements.

**Table 1**

## Mapping Accountability Goals and Means in GEG

First-Tier Accountability: CONSTITUTIVE GOALS		Second-Tier Accountability: REGULATIVE MEANS				
What is the primary purpose?	Who is held to account?	To whom is accountability owed?	Normative priority: For what are they accountable?	Inputs: What process demonstrates accountability?	Outputs: What standards demonstrate accountability?	What sanctions are available?
To represent	Elected officials and civil servants	Electorate and political communities	Responding to regulatory demands, upholding and obeying the law, not abusing powers, serving the public interest	Transparency of deliberative process, disclosure of information, open access to information, public consultations, report cards, participatory audits, budget reviews	Legislation, treaties, conventions, protocols, enforcement, monitoring	Removal from office, legal action through the courts, fines, loss of trust
To profitably generate goods and services	Producers	Consumers, shareholders, and employees	Maximizing social welfare through employing people to supply products and services at the quantity, quality, and price consumers demand	<b>Public Governance Institutions</b> Disclosure of financial position, accurate forecasts of risk and exposure, adherence to standards of business practice	Price, availability, ease of access to desired goods and services, social and environmental benchmarks	Firm collapse, legal action through the courts, reputational loss, profit loss, fines
To promote moral conduct	Norm champions	Social networks	Constructing ethical frames and socializing a standard of accepted conduct	<b>Private Governance Institutions</b> Information campaigns, transparency of deliberative processes, accurate reporting on norm spread	Agent-based uptake of desired conduct	Reputational loss, naming, shaming, fines, loss of influence
				<b>Voluntary Governance Institutions</b>		

The six accountability questions should be applied to both the first and second tiers of governance. Discussions of accountability tend to concentrate on the execution of public accountability through holding signatory states responsible to agreements and targets. Internationally, public governance is articulated through a patchwork of treaties, protocols, and agreements between states that have emerged over the last seventy years. Now more than 1,200 MEAs and 1,500 bilateral agreements between states cover the global environment (Mitchell 2002–2015). States have also created and repurposed IOs to enforce and operationalize these agreements.

In many MEAs and the attendant governance institutions, an accountability analysis would provide a forensic account for explaining who got to choose the “right” approach for addressing environmental problems, while revealing the biases that animated those choices and determining whether (and to whom) they were accountable for prioritizing certain goals. The traditional focus on states has privileged demonstrating accountability through increasing transparency in international decision-making, disclosing information, and establishing public consultations, report cards, participatory audits, and budget reviews (Warner 2005). Compliance and audit processes for evaluating accountability have accelerated with global patterns of interaction (Davenport and Low 2013). Public accountability outputs include the establishment of standards that environmental actors agree to adhere to: legislation, treaties, conventions, protocols, monitoring, and evaluation targets. Thus, the institutional focus that contributes to an accountability discussion has been limited to enhancing information flows between states and tracing commitments and compliance.

This suggests that accountability is narrowly conceived as compliance but is not identified as promoting certain agendas. Thus, the biases of the authority holders designing GEG remain unexamined. Those governing the environment remain unaccountable because the point of departure for accountability is based on the predetermined goals and installed capacities of public governance institutions. What is neglected is the meaning and value that state discourses attach to the environment. States are crucial for sustaining the major environmental discourses that shape how problems are framed and the policies created to tackle them.

An accountability analysis at the design tier would investigate the design of the goals of public governance, including how problems are framed. Three modern environmental discourses have been identified: the construct of globalized systems of knowledge production, the emphasis of economic efficiency over ethical frames, and favoring imperatives of modernization and development (Warner 2005, 287). Most MEAs have an economic framing of the world’s resources. Although two equity norms have emerged from international conventions—that the environment is the “common heritage of humankind” and that states have “common but differentiated responsibilities”—the success of these norms is attributable to how well they fit into the existing global neoliberal economic order, because they do not require a restructuring of trade, states, and sovereignty (Okereke 2008, 25–26).

The shift away from state-based regulation since the 1990s has allowed the private sector to gain authority to prescribe and proscribe self-regulated environmental interventions. This antiregulatory discourse and shift in authority threatens the democratic deliberation that could render environmental governance goals accountable. It prioritizes governance institutions biased toward other purposes and objects of accountability over environmental problems. Yet firms also demand from states regulated and predictable landscapes to be able to project profitable business models. The merging interests of private industry and accountability-supplying regulatory states have shaped the goals of states, including a focus on scientific consensus for environmental decision-making domestically (Dowdle 2006).

In GEG, bureaucratic forms of accountability are particularly emphasized (Rubin 2006, 54). For example, UNEP is held to account for its activities by its member states. Member states' authority and accountability, in turn, rests on state sovereignty (and increasingly on popular sovereignty). This constitutes a delegation chain from member states to management to staff. Scholars of the World Bank have examined the various means through which bureaucracies are held to account through oversight procedures and management plans (Nielson, Tierney, and Weaver 2006). Failure to meet the standards set by elected officials or bureaucrats should lead to a removal from office or a loss of trust, although evidence of the former remains scarce (Schillemans and Busuioac 2015).

Beyond traditional forms of accountability, current scholarship focuses on how to make IOs more accountable to stakeholders (Ebrahim and Weisband 2007; Held and Koenig-Archibugi 2005). As we identified earlier, being truly environmentally accountable is not only to be held responsible and answerable for one's actions, but to be responsible and answerable for protecting the environment and principal stakeholders, rather than being held to account for meeting the goals of the political, private, or voluntary institutions that are authoritative in a given context. Who counts as a stakeholder? If the World Bank lends donor funds to borrower countries for environmentally damaging projects (such as coal-fired power plants), and both the donors and borrowers are satisfied, then the World Bank is perfectly accountable to both. This contractual relationship omits being held to account by those outside the contract who are nonetheless affected by the World Bank's actions. This draws attention to the limits of traditional accountability delegation chains. We have to go beyond a framework that privileges bureaucratic accountability. Typically, in projects stakeholders are assessed according to how they affect the problem and who is affected by the problem, along a power-versus-interest continuum. In the case of the World Bank and the coal power plants, the stakeholders are not only those immediately affected but also people who may not live in the country requesting the plant, but are nevertheless subject to the environmental effects of that state's decision (see also Mason 2005).

Benner, Reinecke, and Witte (2005, 193) argue that asymmetries in global governance lead to operational and participatory gaps in accountability that

require a pluralist approach to accountability. Public accountability is hierarchical, reproducing assumptions about whom should be held to account in a sovereign state system with unequal power resources, while obscuring gaps in accountability for the powerless (Ebrahim and Weisband 2007, 3–5). There is profound inequality between those producing environmental degradation and those affected, as well as inequality between those with the power and the means to rectify a problem and those who suffer from it (Benner et al. 2005; Chesterman 2008, 44; Mason 2005). Power differentials between groups that incur the greatest costs of environmental deterioration, and intergenerational responsibilities to those future generations that cannot make governance demands on current elected officials and bureaucrats all reinforce our argument for holding up to scrutiny the biased choices behind the design of GEG. Doing so promises greater utility for accountability as a tool for environmental action.

In short, much of the public accountability focus has been on ensuring that specific interventions are carried out. Public accountability has processes, standards, and sanctions for evaluating the execution of public GEG. This includes certifications schemes, green accounting, and carbon markets. Where there is no discussion of the goals of GEG, being held accountable to mechanisms decided by others will be of limited utility to the environment and those likely to be affected.

### *Private Accountability*

Private (and hybrid) governance institutions are particularly important, considering the rise in power and authority of market actors (Cashore 2002). States have ceded authority to the private sector over governance institutions, leading to very different accountability goals. The primary goal of private governance is to maintain industry profitability while maximizing social welfare. Consumers and shareholders hold producers accountable for meeting market demands in a way that generates profit, while abiding by regulatory and social standards of appropriate business practice. Environmental issues are incorporated into market transactions as a constraining factor on profit-making rather than a compelling goal in their own right. Accountability processes, standards, and sanctions in private governance reflect the authority of supply and demand and the secondary placement of environmental issues. Thus, processes of accountability are built into the business model through internal business practices, supply chains, logistics, annual financial reports, and certification schemes. Standards that demonstrate accountability include the price, availability, and ease of access to desired goods and services. Social and environmental benchmarks are added onto these. Failure to meet these standards could result in the firm's collapse, litigation, and reputational and profit loss.

As the framings surrounding debates on corporate environmentalism demonstrate, the focus is on maximizing firms' profits as a first-order concern, while still leaving behind a living planet for future generations (Freeman et al.

2000). Traditional neoclassical economic paradigms treat environmental degradation as an externality whose cost is not assumed by producers. Corporate environmentalism attempts to reverse that practice by internalizing environmental costs into market transactions, yet unlimited growth and profit remains a dominant paradigm over an ecocentric approach informed by the earth's carrying capacity (Banerjee 2002).

First-tier governance applications of accountability would examine to whom the private sector is accountable when establishing new environmental institutions. Private transnational regulation has become an accountability concern, as market actors devise new standards absent engagement and participation from those affected (Dingwerth 2008). As Chesterman notes in relation to transnational regulation, "[P]articipation in these disparate decision-making processes varies widely, but there is rarely a general right for affected parties to challenge a decision; frequently it is not possible even to seek reasons as to why a particular decision was made" (2008, 40).

Even the creation of hybrid governance institutions such as the MSC should be interrogated according to the six standard accountability questions. To whom were Unilever and the WWF accountable when creating the MSC? To their shareholders and members? To the environment and affected stakeholders? Were they accountable for determining that the MSC would not have direct membership or local affiliations, as per the structure of the FSC (Auld and Gulbrandsen 2010, 98)? Private and voluntary governance institutions like both the FSC and MSC establish environmental initiatives that downplay the need for rapid and deep environmental action requiring industry-wide changes, reflecting instead the dominance of market-oriented policy instruments (Chan and Pattberg 2008, 113).

This has led scholars to suggest that private actors cannot be held to account in the way that public actors can. Private accountability systems revolve around the tenets of supply and demand. Product, capital, and labor markets are built on the buying and selling of goods and services, determined by market signals and consumer preferences. Private or market accountability is "often mutual" and more fluid than the hierarchy of public accountability (Chan and Pattberg 2008, 105). Rubin argues that devolving responsibilities to private actors to make their own rules is not accountability, because it "misleads us into thinking that the firm is being supervised or controlled, while in actuality it can violate public norms with impunity" (2006, 66). Market actors operate within both public and private law, where "constraints are designed largely to make the competitive process work more effectively" (Mashaw 2006, 123).

Others suggest that the purpose of accountability that characterizes public governance institutions can be integrated into the private sphere through "publicization," in which private actors commit to public goals as the price, for example, of accessing opportunities to supply goods and services (Freeman 2006, 83–86). The dramatic shift toward private GEG publicization signals the possibility of ensuring environmental action commensurate with environmental

demands. Yet efforts to establish accountability in private governance tend to focus on functional requirements, leading scholars and policy-makers to view accountability as an end in itself. When second-tier environmental interventions in nonstate certification schemes are examined, for example, the extent to which they are decreasing deforestation or improving fish stocks is unclear. Despite the popularity of such schemes in the West, structural barriers to their global uptake stem from the fundamental design choices of their governance institutions. These barriers include the uneven geographic representation stemming from the dominance of industrialized companies in creating the rules, as compared with the lack of infrastructure, economic capacity, and expertise among companies in developing countries striving to meet certification requirements (Dingwerth 2008; Pattberg 2005, 366).

The burgeoning scholarship on private and hybrid governance institutions examines how they have taken up “public” accountability mechanisms to denote their commitment to accountability, leading in some cases to processes and standards not dissimilar from the mechanisms of public accountability (Auld and Gulbrandsen 2010). Thus, both the FSC and the MSC have processes for greater transparency and more deliberative and participatory decision-making, as well as for disclosing information, ensuring public consultations, and establishing reports assessing their conduct (Auld and Gulbrandsen 2010; Cashore 2002; Chan and Pattberg 2008; Gulbrandsen 2008; see also Gulbrandsen and Auld, this issue). Some, such as the MSC, have also established formal recourse mechanisms to challenge decisions (Gulbrandsen and Auld, this issue).

Yet as Chesterman (2008, 42) points out, regimes (including transnational private ones) are more commonly “designed with an accountability deficit in place.” In other words, despite allowing for greater “public” accountability in the structure of private voluntary governance institutions, the design of such “open” institutions may meet other primary goals, which needs to be further interrogated. In the case of the MSC, accountability processes may be used “instrumentally” to advance the goals of the governance institution, such as ensuring its legitimacy in maintaining profitability rather than sustainability (Auld and Gulbrandsen 2010, 98; Gulbrandsen 2008). This reinforces the argument that accountability can only be a meaningful tool for environmental action if it is used to interrogate the choices made by authority holders in determining the design of GEG and the environmental interventions and accountability processes that follow.

### *Voluntary Accountability*

Transnational activists have been powerful drivers of change in GEG, aiming to promote moral conduct (Finnemore and Sikkink 1998). Voluntary accountability is focused on meeting standards of appropriate conduct promoted by norm champions within social networks (Mashaw 2006, 124). This involves being held morally accountable to other individuals, as well as to formal and informal



social networks outside the state and marketplace (including family, friends, and associations). Indeed, the “creation of most environmental groups can be traced back to core values within civil society” (Cashore 2002, 522). Voluntary accountability systems are much more fluid and flexible than the “rigidly defined and jurisdictionally cabined” administrative and legal “subcategories” of public governance (Mashaw 2006, 126–127). Obligations may be formal or informal and are “informed by judgments of appropriateness” (Chan and Pattberg 2008, 105).

Voluntary actors such as ENGOs are accountable for constructing ethical frames and socializing a standard of acceptable conduct and for holding themselves to it. The processes that voluntary actors use to demonstrate their accountability are to provide information on their practices and to engage in campaigns, lobbying, and marketing to spread their ideas. The standards of accountability to which they are held are determined by their social networks (Balboa 2015, 172). Failure to be responsible and answerable for spreading new ideas and ethical frameworks could lead to reputational loss, being “named and shamed,” leading to a loss of influence and materially undermining the operation of the organization or association.

Carbon rationing action groups (CRAGs) provide an illustration of voluntary accountability. These community-based groups voluntarily cap their carbon emissions and self-impose fines if they surpass their annual targets. CRAGs’ primary goal is to promote personal, responsible conduct vis à vis climate change. CRAGs, as a localized response to climate action, originated in the UK and spread to the United States, Canada, and China (Hoffmann 2011). CRAG members form a social network of shared values and hold themselves and each other accountable to an annual target of carbon reductions. Members self-report on their carbon emissions, and the group fines those who exceed the agreed targets. Previously, accountability relationships in the voluntary sector were based on the kind of trust that CRAGs exemplify, but more recently they have shifted to bureaucratic compliance and auditing processes as the connections between actors have multiplied via globalization (Davenport and Low 2013, 88–89) and as ENGOs have been pushed to meet public accountability processes by donors (Balboa 2015).

Beyond its self-imposed social standards, the voluntary sector is important because of the role that activists play in demanding that environmental degradation be subject to public regulation and that private actors be held to account (Mason 2005). The power to hold actors in positions of authority responsible and answerable for their actions is to determine what broader social goals matter and what are the legitimate grounds for making authority holders accountable. This stems from social networks as a site of “meaning-making” about what constitutes acceptable behavior (Mashaw 2006, 126). Voluntary accountability can bring actors together into a hierarchical authority relationship where none had before existed (Gulbrandsen 2008, 578).

In a first-tier governance examination of voluntary accountability, the six standard questions should be applied: who is accountable in voluntary governance

institutions, for what and to whom, and what processes, standards, and sanctions are in place? While the CRAGs above represent pure voluntary governance institutions, first-tier interrogations should also be applied to hybrid governance institutions. The voluntary actors with the biggest influence are those who “shout the loudest” (Chesterman 2008, 49), and they are not necessarily representative of all affected stakeholders (Dingwerth 2008). Even those promoting environmental concerns can be biased toward other priorities, such as offering moderate reforms over radical ones to influence public and private governance institutions (Maniates 2001). This is particularly pronounced when using “market-oriented policy instruments ... to address matters of concern to global civil society” (Cashore 2002, 503, 514). This has meant that environmentalism has successfully created a “new societal occupation,” but it has not stopped serious environmental degradation (Engels 2010, 128). The influence of transnational activists has not necessarily been matched by new accountability mechanisms (Chan and Pattberg 2008, 106). If there is no accountability for the goals the voluntary sector promotes, it is unsurprising that environmental problems persist or that stakeholder demands for responsiveness from governing institutions continue.

Voluntary actors advocate greater accountability of second-tier type environmental interventions, such as certification schemes, because they are complicit in choosing the goals for governing the environment, designing corresponding institutions, and supporting others, even if those interventions “do not address environmental groups’ fundamental critiques and concerns” (Cashore 2002, 518). To illustrate, accountability in global forest governance has shifted from private institutions to “collaborative civil society based regimes” (Chan and Pattberg 2008, 104). Despite the move toward stakeholder governance accountability, deficits remain. Authority holders in these environmental institutions choose to adopt specific accountability processes not based on what might be effective in holding actors to account for their actions, but because the measures are considered appropriate by voluntary actors (Gulbrandsen 2008).

To explain, “popular organizational accountability recipes may or may not enhance control [over the organization through monitoring] and responsiveness [to stakeholders demanding accountability], but as long as the organization adopts those recipes it is deemed successful by external audiences” (Gulbrandsen 2008, 569). The upshot, Gulbrandsen argues, is that the “spread of particular accountability arrangements appears to be driven more by expectations and demands in organizations’ institutional environments [ENGOs] than the instrumental function of these arrangements,” leading to more formal accountability processes but less responsiveness to critics and stakeholders (p. 577). Thus, “accountability understood in this way could become a meaningless ritual of justifying conduct by answering only those questions that the answerable party has decided upon” (Gulbrandsen 2008, 578). The appearance of accountability here demonstrates how “accountability mechanisms have frequently been responsive to the realities of power not merely in implementation but in design” (Chesterman 2008, 47). This strengthens our call to identify

how accountability mechanisms are tied to the inherently biased goals of GEG institutions.

## Conclusions

A growing number of governance institutions have incorporated environmental accountability mechanisms in response to the demand for environmentally effective and democratically responsive governance—yet the environment continues to deteriorate. We provided a two-tier explanation for this “accountability paradox” and suggest a path to recover accountability as a meaningful tool for environmental action. First, actors in public, private, voluntary, and hybrid institutions are not held to account for the design of environmental interventions. Environmental governance involves biases that determine what counts as an appropriate response. In the absence of accountability for these biases, governance institutions are able to subordinate environmental ends to goals determined by different institutional logics. Second, and as a result of this deficit, efforts to establish accountability tend to focus on functional requirements, leading scholars and policy-makers to view accountability as an end in itself. We have argued throughout that accountability can be a meaningful tool for environmental action only if it is incorporated in the first tier of environmental governance, where agenda and goal-setting take place: from the understanding and framing of problems, to formulating alternatives and choosing appropriate strategies for action.

Accountability remains a weak tool for environmental action because it is conceived as a monitoring, compliance, and enforcement device that is applied, as an appendage, to the execution of particular interventions. This is the case when consultations with stakeholders of environmental problems take place after public, private, or voluntary governors have already drawn the constitutive boundaries of what is possible. This reduces accountability to a policing function and negates its leverage for spurring environmental action. Given the continued growth of accountability mechanisms without teeth, current applications of accountability in GEG run a real risk of enabling continued environmental degradation rather than protection.

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