



COMMUNICATIONS STRATEGIES FOR ENFORCEMENT PROGRAMS

Capacity Building Support Document International Training Workshop



Ministry of Housing,
Spatial Planning,
and the Environment
(VROM) The Netherlands

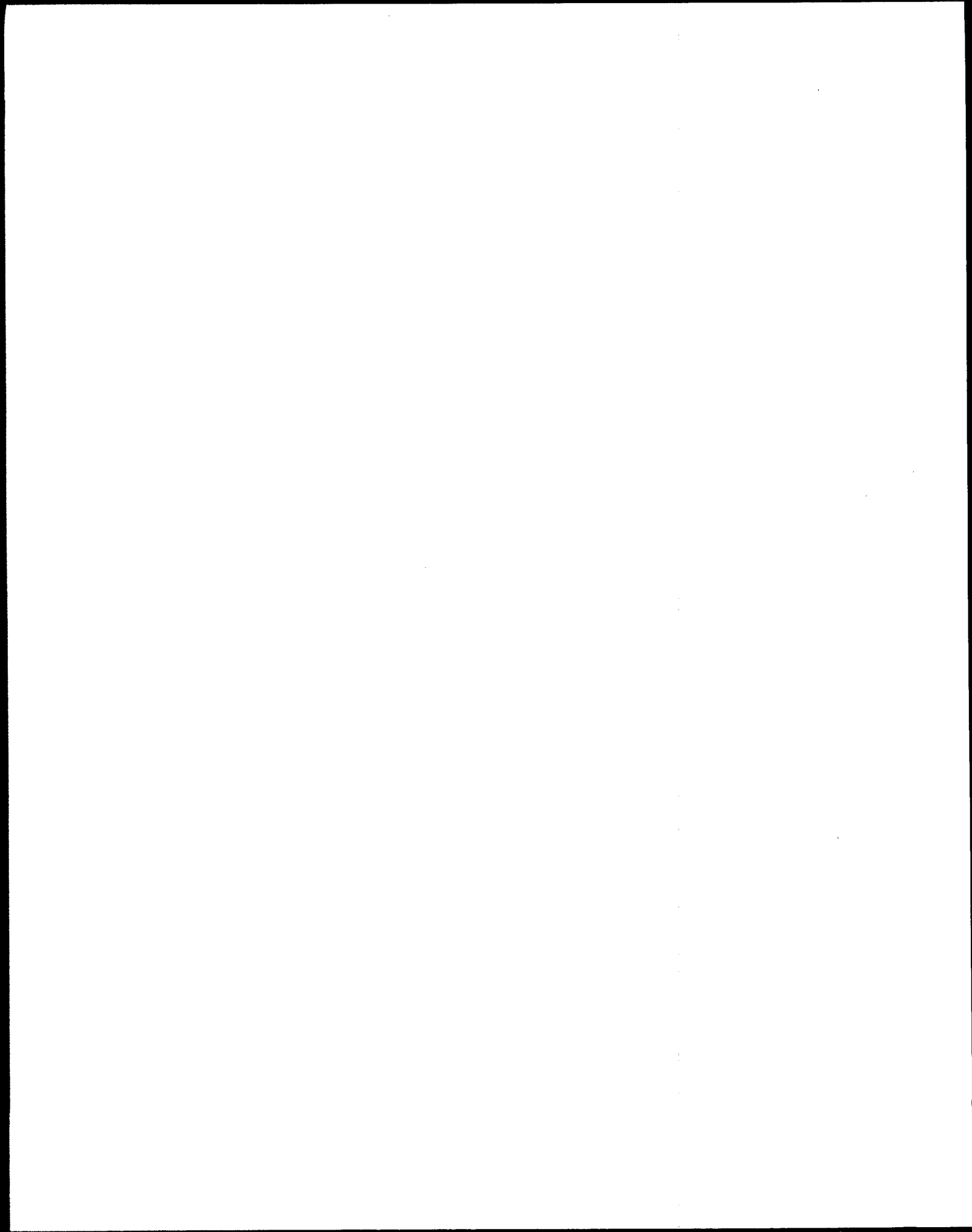


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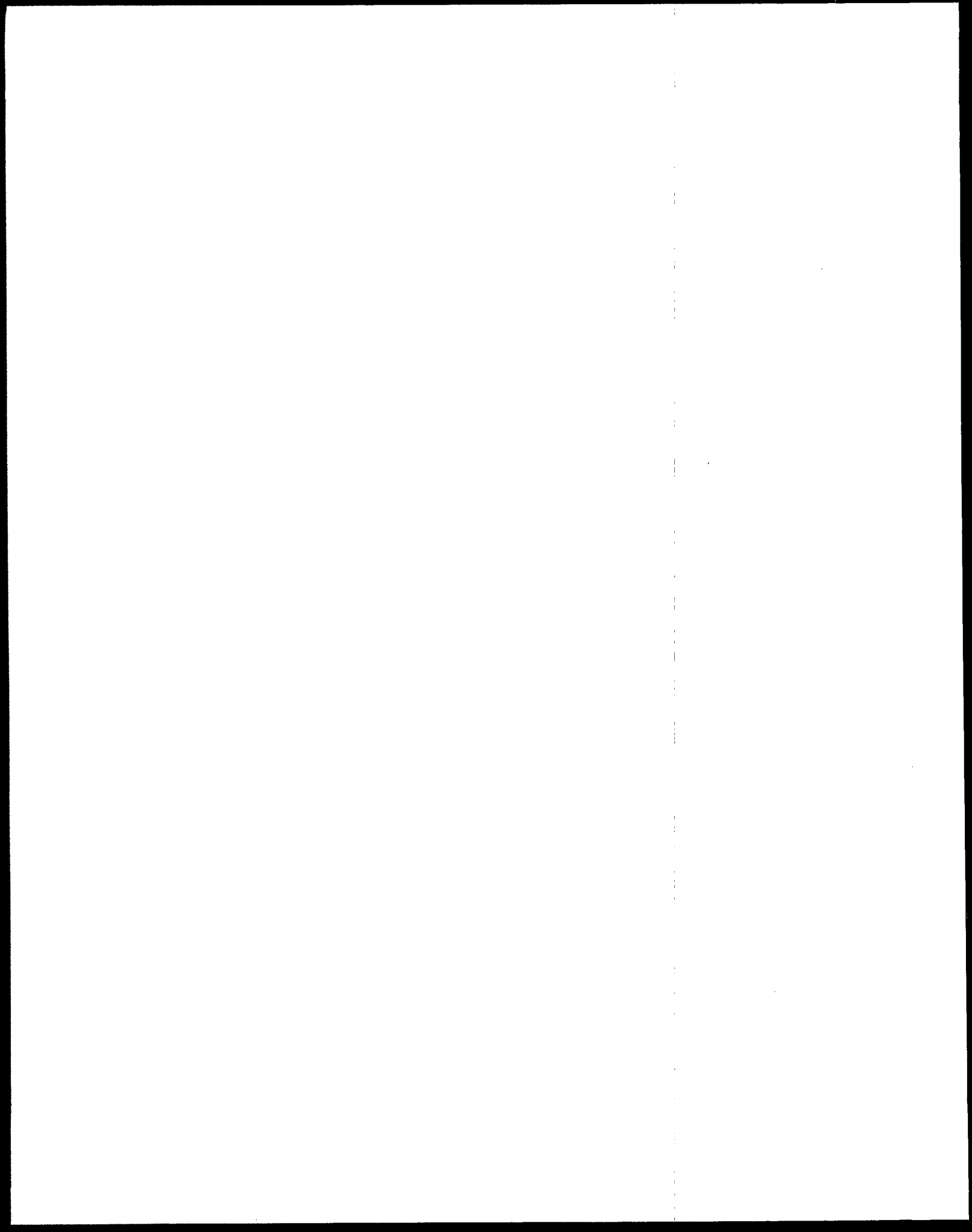
POLLUTION CONTROL DEPARTMENT
THAILAND



COMMUNICATION STRATEGIES FOR ENFORCEMENT

*Capacity Building Document for Environmental
Compliance and Enforcement Programs*

April, 1996



PREFACE

This document, *Communication Strategies for Enforcement*, was originally prepared in 1996 as one of five Environmental Compliance and Enforcement Technical Capacity Building and Technical Support documents prepared to support the Fourth International Conference on Environmental Compliance and Enforcement held in Chiang Mai, Thailand, April 22-26, 1996 and ongoing international networking and capacity building under the auspices of the International Network for Environmental Compliance Enforcement. It was maintained as a review draft to accommodate comments and additional country examples. This final version remains unchanged and is published in final for use at the Fifth International Conference in Monterey, California, November 16-20, 1998 along with several new capacity building documents. These documents are prepared as resource documents to be used by government officials and others who have responsibility for developing or enhancing environmental compliance and enforcement programs. The documents include:

- Financing Environmental Permit, Compliance and Enforcement Programs
- Source Self-Monitoring, Reporting, and Recordkeeping Requirements: an International Comparison
- Multimedia Inspection Protocols: International Examples
- Communications Strategies for Enforcement Programs
- Transboundary Trade in Potentially Hazardous (Waste, Pesticides, and Ozone Depleting) Substances
- International Inspector Training Compendium, Course and Program Comparison
- Country Progress/Self Assessment Reports on Environmental Compliance and Enforcement
- Citizen Enforcement: Tools for effective participation

Consistent with the goals of the Executive Planning Committee for the Fourth and Fifth International Conferences and the ongoing goals of the International Network for Environmental Compliance and Enforcement to build capacity internationally for environmental compliance and enforcement, this document addresses key aspects of how and why to incorporate communications as a vital part of enforcement strategies to make them more effective.

The Third International Conference on Environmental Compliance and Enforcement in Oaxaca, Mexico (1994) pointed out the important role of communication in the enforcement of environmental requirements. This led to the inclusion of a workshop on communication and enforcement at the Fourth International Conference in Chiang Mai, Thailand. Linking communication to enforcement is relatively new. There are of course examples where enforcement involves communication. But this nearly always concerns implicit or incidental use of communication. Structured approaches which consider the impact enforcement actions can make through use of publicity, visibility of inspections, project-announcements etc., are scarce, to say the least.

The objective of the workshop and manual is to demonstrate the importance of communication in the enforcement process and to show how to profit from the power communication has. It not only provides theoretical background information on the various aspects of communication, but also involves an immediate translation of this theory to the practice of environmental enforcement. This makes the workshop and manual of importance for everyone involved in the enforcement process, from governmental policymakers to the individual environmental inspector. It can help you to take the first steps towards an effective combination of enforcement and communication.

Communication Strategies for Enforcement and the other documents listed above are available on the International Network for Environmental Compliance and Enforcement's (INECE) Internet site: <http://www.inece.org>. They also are available from the INECE Secretariat at the addresses below. Finally, the INECE Secretariat seeks your comments as to whether these documents serve their intended purpose and how they might be improved. Please send comments in writing to the INECE Secretariat in care of Ms. Wasserman or Mr. Gerardu at the following addresses:

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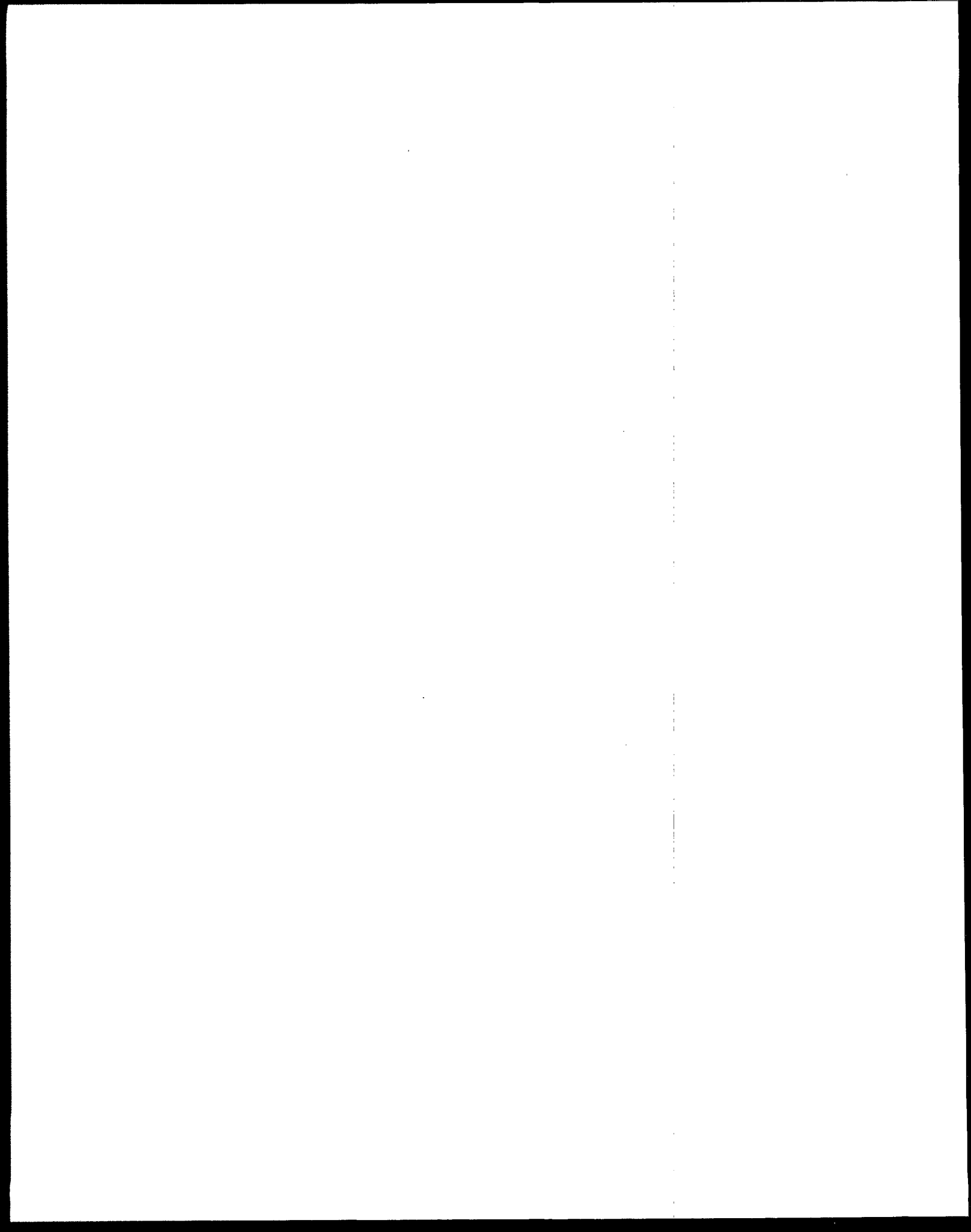


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1 Introduction

1.1 Communication and Enforcement

This manual focuses on the relationship between enforcement and communication, both instruments in the environmental policy of the national as well as the local government. The objective of environmental policy is to direct companies and individuals toward more environmental-friendly behaviour through compliance to regulations.

Enforcement is one of the most powerful instruments to influence behaviour of individuals and, consequently, of companies. The objective of enforcement is to achieve compliance within the regulated community. Although this manual concentrates on enforcement practice, it is absolutely vital to keep in mind that effective enforcement demands adequate environmental laws, requirements and sanctions.

One of the main problems for environmental enforcement is the imbalance between the huge amount of companies under regulation and the *limited enforcement capacity*. It is simply impossible to enforce every environmental law adequately by inspecting each company individually on a regular bases. A more sophisticated approach of enforcement is needed.

This manual demonstrates the potential of *communication* to raise the *effectiveness* of the enforcement.

1.2 Three Propositions

In this manual three propositions are presented about the way communication can leverage the effectiveness of your enforcement-activities. These propositions are the guideline in this manual.

Proposition 1:

Communication makes environmental enforcement more effective by influencing the perception of the enforcement-action.

The effectiveness of enforcement depends on the '*chance to get caught*': the probability to get caught if you violate the rules. The effect this '*chance to get caught*' has on compliance is based on two elements: the factual chance to get caught and the *perception* of (feeling about) this chance to get caught. If the government inspects 10 out of the 100 companies, the factual chance to get inspected is 10%. But if the government communicates about the enforcement-action probably more than 10 companies *feel* they run the risk to be inspected. This feeling alone can change their behaviour. This is what communication can do. Chapter 4 of the manual explains in detail the chance to get caught concept and how it can be influenced by communication.

Proposition 2:
Communication and enforcement should be integrated.

Like enforcement, communication is an instrument of environmental policy. These two instruments are not independent of each other: if employed in the right combination they reinforce each other, but if handled separately they can do more harm than good.

For communication to make enforcement more effective, it's necessary to integrate these two instruments of environmental policy. Successful integration means the implementation of *Two Basic Rules*:

1. *No Enforcement without Communication!*
2. *No Communication without Enforcement!*

Putting a lot of effort in enforcing environmental requirements without communicating in one way or the other that you're making these efforts, means a chance has been missed. Checking compliance without making this known to the regulated community is not a very efficient way of stimulating environmentally friendly behaviour. In other words: enforcement should be accompanied by communication.

Vice versa is it in the long run not effective to constantly communicate about enforcement and threaten with compliance-checks, while in fact there are none. Communication by itself is not enough.

In this manual it is argued that bringing these two principles in practice demands an integration of enforcement and communication. This means planning, development, execution and evaluation of enforcement and communication take place simultaneously. They support one another. How this integration can be accomplished is demonstrated with the *Peeling Model* encompassing enforcement and the different ways to communicate: Chapter 5 of this manual.

Proposition 3:
A strategic approach for both enforcement and communication is a prerequisite for success.

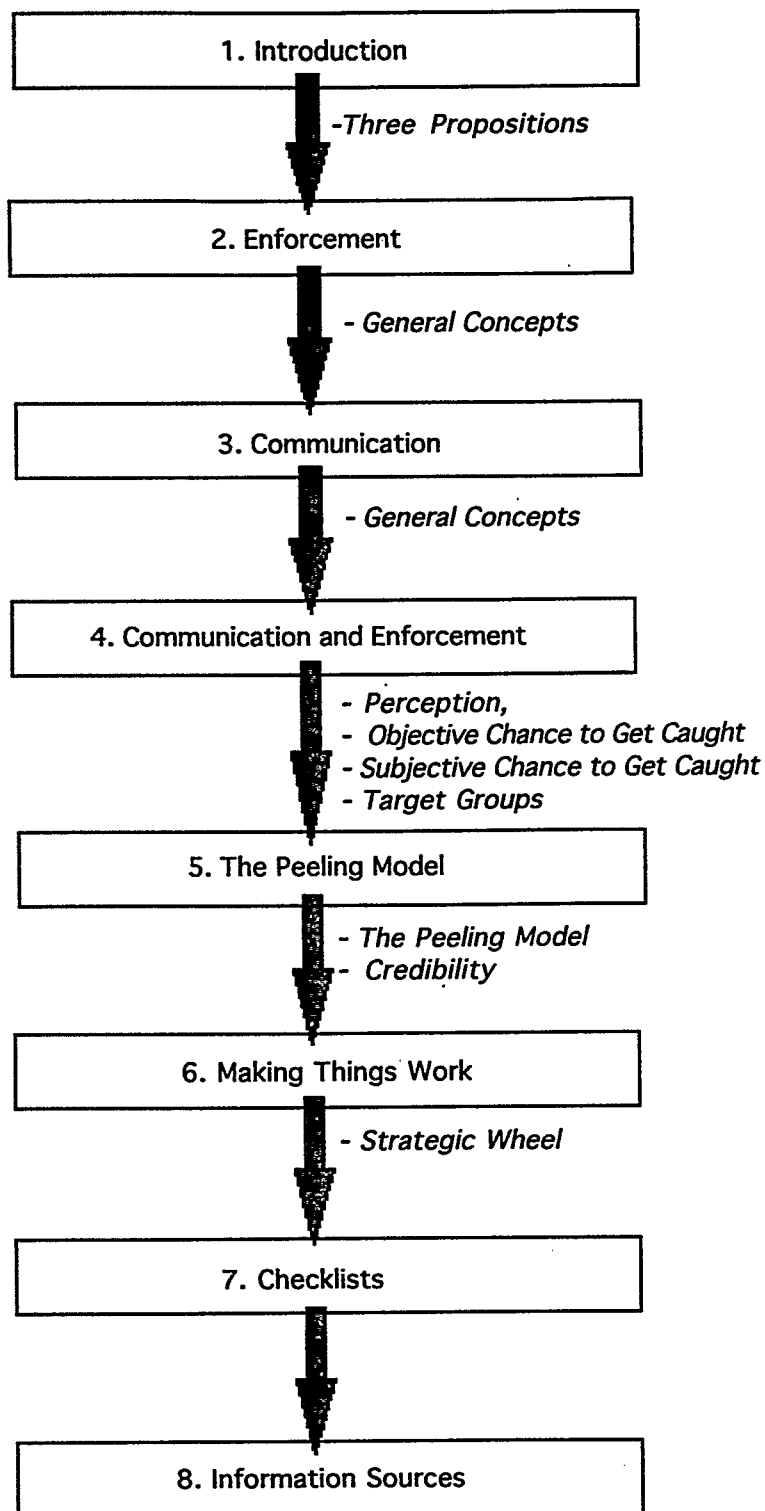
Proposition 3 logically springs from proposition 2. Integration of enforcement and communication demands a strategic approach. This implies the development and formulation of a strategy: a long term approach based on a thorough analyses of the present situation and the environmental problem at hand, the relevant target groups and the means of enforcement at your disposal. Chapter 6 presents a method for strategic enforcement- and communication planning: *The Strategic Wheel*.

1.3 How to read this manual?

After the introduction in chapter 1, chapter 2 and three give an overview of the most important theoretical concepts of enforcement, communication and their interrelation. Chapter 4 to 6 deal with the three propositions, stated above. To help you use the ideas and concepts of the manual in your day to day practice, chapter 7 presents the checklists. In chapter 8 you can find the information sources used for this manual.

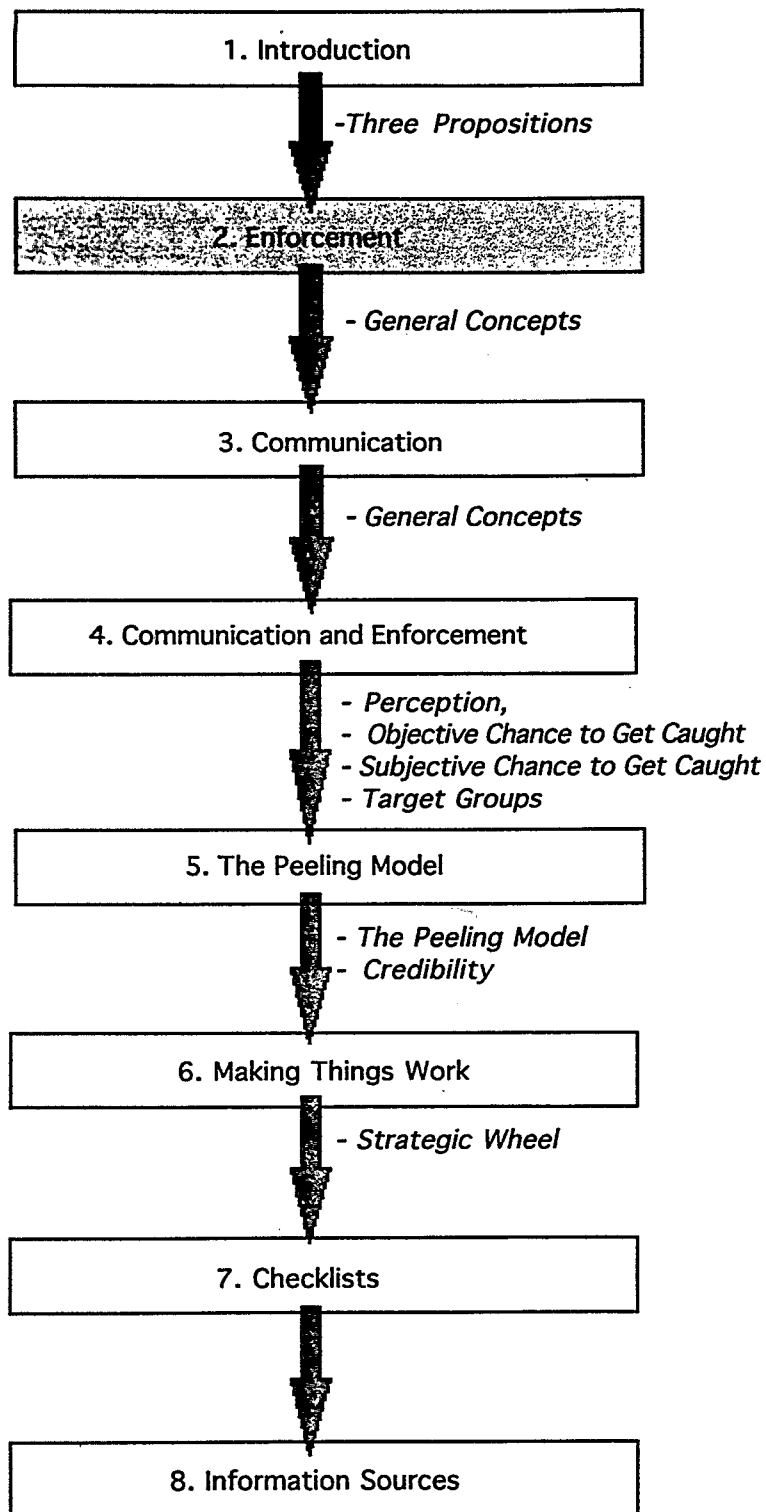
Below, a schematic outline of this manual is presented.

Hopefully this manual shows you the way to make enforcement more effective through communication.



Background

- *general concepts* -



2 Enforcement

During the last ten years more effort has been put into environmental enforcement. Before discussing the role of communication, this chapter gives a very brief overview of the development of enforcement, resulting in the formulation of the challenge for the next ten years.

2.1 An Instrument of Environmental Policy

To make sure there is agreement on the meaning of environmental enforcement, it is useful to start with a definition:

Enforcement is the set of actions that governments or others take to achieve compliance within the regulated community and to correct or halt situations that endanger the environment or public health. (Office of Enforcement, U.S. Environmental Protection Agency (1992). Principles of Environmental Enforcement. p.1-2.)

Enforcement is an important instrument of environmental policy. It serves environmental policy on two main objectives:

1. Promoting Compliance

Primary goal of the enforcement is the promotion of compliance. Compliance is the full implementation of environmental requirements.

2. Supporting Credibility

Besides directly promoting compliance, enforcement serves environmental policy in another way. It provides environmental laws and requirements with credibility. The regulated community judges laws by the way they are enforced: *"If the law is not worth enforcing, it probably isn't worth complying either!"*.

2.2 Correction and Prevention

Discussions on enforcement always involve a distinction between corrective and preventive enforcement. In this paragraph the strict distinction of these two concepts is disputed.

In general, we speak of *corrective* enforcement when the enforcement action is directed at behaviour that already took place. Offending a rule triggers an enforcement action. Figure 1 depicts this process. This philosophy of 'make the offender pay' is illustrated by the XXX-case.



Figure 1
corrective Enforcement

The XXX-case

Violations found during a 10-month investigation, including among others illegal land disposal of hazardous waste, resulted in a settlement between Company XXX and the U.S. E.P.A. In this settlement XXX agrees to pay a \$ 8 million penalty. Furthermore XXX has to repair and upgrade the facility at a cost estimated to be in the tens of millions of dollars.

Source: U.S. E.P.A.

Whereas corrective enforcement is directed at past behaviour, *preventive* enforcement aims at future behaviour. Its primary goal is to change behaviour before offences occur. This approach is illustrated in figure 2.



Figure 2
Preventive Enforcement

Derelict Vehicles

A Dutch enforcement project in one of its provinces handling the problem of derelict vehicles aimed at closing down the great majority of the car dismantlers. With less competition it would be economically feasible for the remaining firms to take measures to protect the environment. A licensing system made this possible. The province started an intensive inspection program. The dismantling firms were inspected on three occasions. The first round was meant to be informative. Violations found during the second round led to a formal warning. Only offenses discovered during the third inspection were sanctioned. During the first round it transpired that 50 % of the firms complied with the rules. In 1995 the percentage has risen to 85%.

Source: Environmental Law Enforcement in practice in the Netherlands (1995), p. 104 -106.

The 'XXX-case' and the 'derelict-vehicles-case' are typical for the difference between the corrective and preventive enforcement approach. But is it fair to say the XXX-case is nothing more than corrective action and the derelicts-approach is pure preventive? It probably isn't. In fact, the difference between corrective and preventive enforcement is based on a short term perspective on enforcement.

Of course the XXX-settlement in itself is corrective. But mark the words of the U.S. E.P.A. Assistant Attorney general at the press conference shortly after the settlement:

"...the penalties contained in today's settlement should sent a clear message that business must either comply with our environmental laws or inevitably pay a stiff price for avoiding their public responsibilities.....Let this send a clear signal, when the well-being of future generations of Americans is at stake, we will never permit anyone to profit from environmental violations."

Obviously, the settlement with XXX is used to influence future behaviour. The U.S. E.P.A. aims for a strong deterrence-effect. In the same way the preventive measures taken in the Dutch case of derelict vehicles are supported by the threat of corrective action. Sanctions have to be paid if, in the third inspection-round, offences are found. These two cases show if you apply a broader time-horizon every good enforcement action has an element of correction and an element of prevention. The two figures shown above can be compressed in one cycle of enforcement.

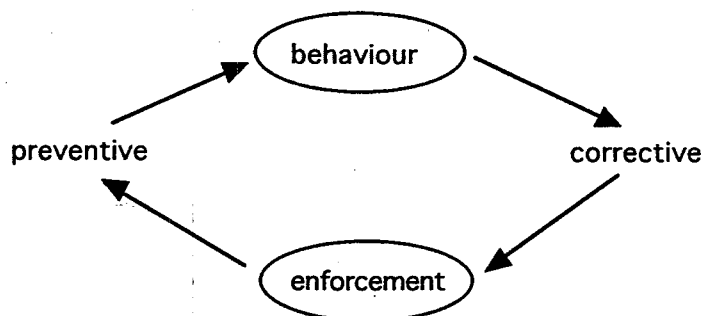


Figure 3
The Enforcement Cycle

2.3 Enforcement: the State of the Art

Overlooking the global map it is possible to discern three possible situations in which you find the development of enforcement policy. First of all there is the situation in which there is no environmental enforcement what-so-ever. It is *absent*.

A second situation you come across is to be characterized by an *ad hoc* approach of enforcement. Enforcement activities take place but in an unstructured way. The enforcement is *re-active*. Action is provoked by environmental problems, obvious offences of environmental requirements etc. Probably most countries' environmental enforcement policies can be labeled as being *ad hoc*.

The third category groups the cases in which enforcement is approached systematically, resulting in a *structured* and planned environmental enforcement policy. Enforcement is no longer just a reaction on environmental problems and offences, it's also proactive in the sense that it is aimed at avoiding these problems.

Nigeria Moves From No Enforcement towards Ad Hoc Enforcement

Enforcement is absent:

After a period of booming industrialisation, Nigerian government started to take notice of the environmental downside of uncontrolled industry-growth, especially the discharging of liquid effluents and solid wastes into open drains, stream, channels and lagoons. Although some laws, dating back to the colonial period, existed, coordination and enforcement were almost nil.

Enforcement is adhoc:

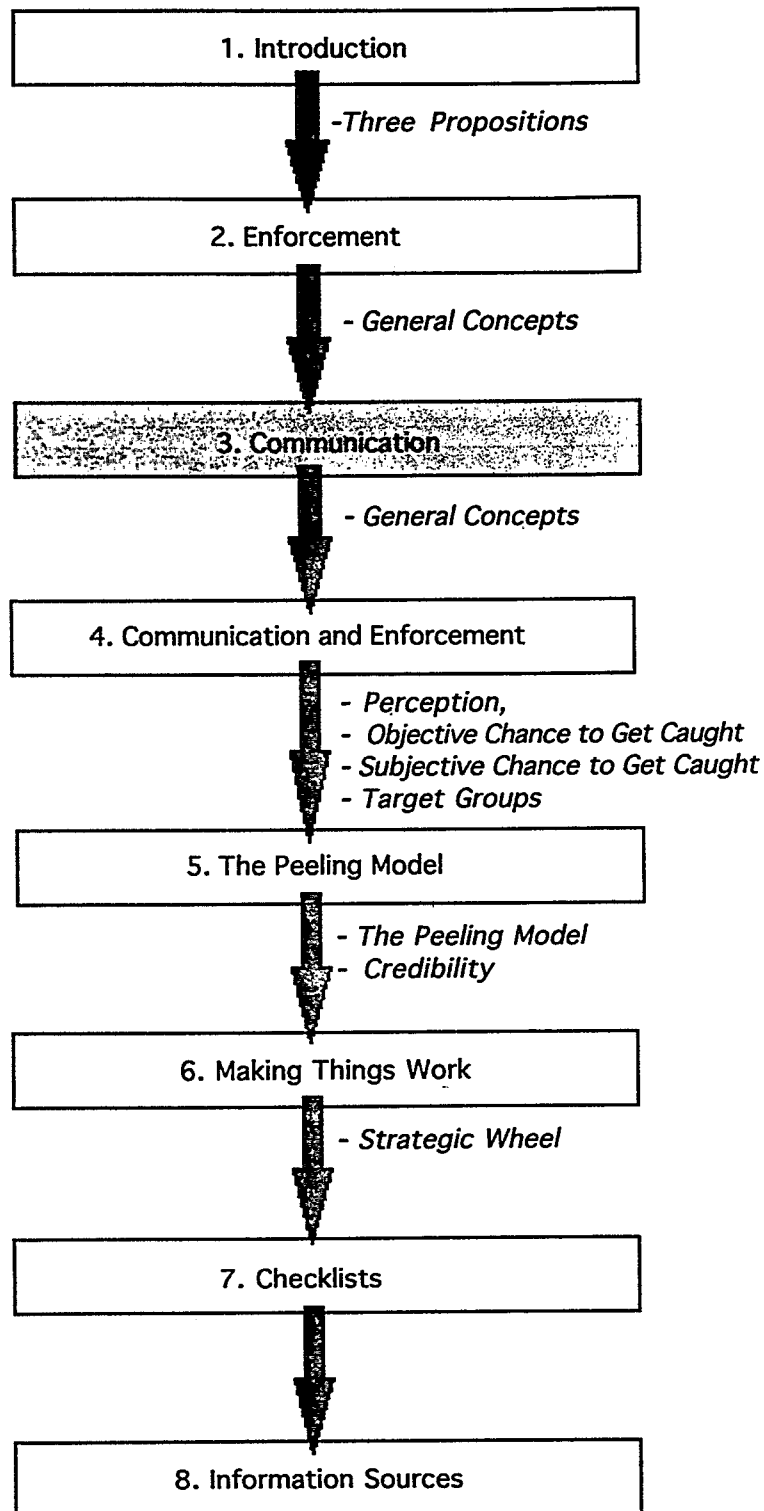
In reaction of a toxic waste incidence the Government set up a Federal Environmental Protection Agency, including an Inspectorate and Enforcement Department. Industries are encouraged by In-House-Training to do self monitoring and industries are required to obtain permits. Mostly unannounced inspections check compliance and ensure high-quality self-monitoring. Total annual inspections exceed 300. In addition, supporting measures were taken, like encouraging public complaints and starting a campaign on moving economy towards better processing and less polluting technology. Compliance rates were in 1994 still low, but improving.

Source: Proceedings Volume 2 Third International Conference on Environmental Enforcement (1994), p. 123-128.

2.4 The Challenge for Environmental Enforcement

The last ten years environmental enforcement has become a major issue: governments sharpen their environmental policies and issue laws, inspectors visit companies and execute audits to check compliance, projects are started to save forests or to prevent illegal dumping.

But, the task environmental enforcement faces is immense. There is so much ground to cover with the limited enforcement capacity available to governments. There are limits to how many inspections you can perform. Inspections are costly. They demand human resources, technical equipment and education. Budgets are, by definition, restricted. This makes it crucial the enforcement effort is *more effective*. The question is: how do we get the most out of our enforcement money? This manual shows how communication can help you.



3 Communication

Communication encompasses all kinds of activities. Every day we communicate and get information by television, newspapers, small-talks, reports etc. After giving a general definition of communication, we will focus on the role of communication as an instrument of environmental policy, especially in relation to enforcement.

3.1 Communication: Definition

Defining 'communication' has proved to be an awkward task. For the purpose of this manual we adhere the following definition:

Communication is every informationflow and informationexchange between organisations and/or persons, with a certain objective.

In the case of environmental enforcement the objective of communication is to achieve environmental-friendly behaviour in general and compliance by the regulated community in particular. For this manual it's important to get a clear view on what communication can do in relation to the environmental policy and the enforcement in particular.

3.2 Communication: Instrument of Environmental Policy

The objective of environmental policy is to change behaviour in a more environmental friendly way. Therefore the government uses all kinds of instruments:

- regulations
- financial instruments, subsidies
- sanctioning
- enforcement
- communication
- education
- research
- facilities
- covenants

Most of the time the government uses a mixture of different instruments. Communication is one of these instruments.

Reducing Water Pollution by Discharges

An effective campaign to reduce waterpollution by discharges possibly includes the following measures:

- *regulation on discharges*
- *enforcement of regulation: inspections to check compliance and sanctions on non-compliance*
- *inform companies on the new regulations through brochures*
- *a branche-meeting to promote and explain possible measures companies can take*
- *research on how the regulated community thinks about regulations on discharging*
- *information centre to answer questions and practical advise*
- *financial support, subsidization of new technologies*

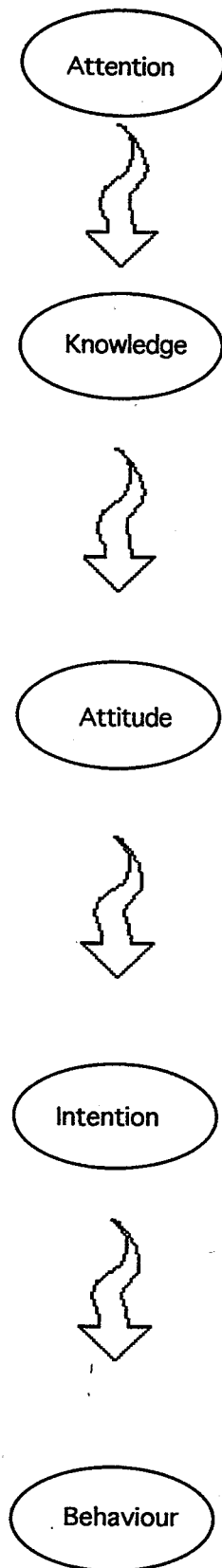
A combination of different instruments is most effective because they can reinforce each other. This especially applies for communication as an instrument of environmental policy.

3.3 What Communication Can Do

Communication operates on different levels, aimed at influencing behaviour.

Five levels are discerned: Attention, Knowledge, Attitude, Intention and Behaviour. Below, these levels are explained, starting with the Attention level, then moving closer to actual behaviour with every next level. It is important to understand this is not one and only sequence of communication levels. In fact, the different levels are highly interrelated.

Furthermore it should be said, communication alone is never enough to change behaviour. Something more is needed to change behavior, like: environmental research, new regulations, sanctions, financial support, enforcement etc.

Attention:

At this first level of influence communication makes the problem at hand an issue of concern for the regulated community.

Examples:

- publishing environmental research results
- speeches by the Minister or other authorities on this matter
- news items on environmental pollution

Knowledge

At the knowledge level communication is pure informative. It raises the knowledge about environmental problems, regulations, the enforcement etc.

Examples:

- informing the community about new license requirements
- explaining the individual implications of new regulations
- information about the sanctions on non-compliance
- information about financial support for companies who intend to take adequate measures
- announce enforcement action

Attitude:

To convert the knowledge of the environmental problem, the regulations and the enforcement into a positive opinion towards compliance, it is necessary to add communication at the attitude level. Explain the reasoning behind the regulation and make the regulated community aware of their individual contribution to the environmental pollution and their responsibilities.

Examples:

- the presentation of achieved results
- showing the negative effects of non-compliance on the environment
- explaining the reasons for regulations

Intention:

Transforming a positive attitude into an intention to change behaviour, to comply, asks for another level of communication. This level creates the desire to comply, by making compliance more attractive (rewarding) or by making it unattractive not to adjust your behaviour (punishing). Communication can make these positive and negative impulses known to the community.

Examples:

- example setting to deter offenders
- communicating the sanctions on non-compliance
- announcing inspections
- rewards for good behaviour

Behaviour:

Finally a positive intention must lead to an actual change in behaviour. Communication at this level facilitates compliance.

Examples:

- supporting compliance with advice
- instructions to facilitate compliance
- information on financial support to achieve compliance

3.4 Enforcement Communication: the State of the Art

In the same way enforcement can be divided in three categories, it is possible to describe the use of communication. In most cases communication is not yet used as an instrument of enforcement. Enforcement communication is *absent*.

Sometimes enforcement communication is used in an *ad hoc* manner to enforce environmental laws. In general this is triggered by the attention the press pays to an environmental problem. Especially major environmental calamities do very well in attracting the attention of press and public, and so will the environmental enforcement's reaction to this calamity. It is only at this moment enforcers take extra care of what they say and do. They realize themselves that the media lever the effect of their words and actions. Note that the first impression the environmental enforcement makes in this situation is a negative one. After all the damage is already done.

A third group is a very small group of cases in which communication is used structurally as a means of enforcement. Environmental policy is aimed at creating publicity and employing other means of communication to enlarge the effect of the enforcement activities.

Auto Service Shops in Santa Rosa

Auto service shops created a significant source of water and air pollution for the Municipality of Santa Rosa. The service shops became the target group of a special enforcement program. Auto service shops that achieved full compliance based on a multimedia inspection were offered to voluntarily receive a seal (sticker). The public was encouraged to do business with shops displaying the seal, through a well organized outreach campaign, including television-advertizing. Materials, like handouts with 'Best Management Practices', pollution prevention techniques and sources for waste recycling, were produced to assist the industry in achieving compliance. In addition local agencies that monitor and enforce environmental requirements at services stations joined forces. They produced an inspection checklist, thereby allowing any one agency to perform a complete, multi-media inspection, referring serious violations to the appropriate agency for follow-up enforcement.

Source: Proceedings Volume 2 Third International Conference on Environmental Enforcement (1994), p. 205 -206.

3.5 The Challenge for Communication

To ensure a longterm effectiveness of enforcement, continuity is essential. Needless to say this demands a systematic approach with structured enforcement, but also with structured communication. This is the only way to accomplish a consistent enforcement of the environmental laws which is effective and efficient. The challenge for communication is to support the enforcement in such a way the effectiveness of enforcement as an instrument of environmental policy will be strengthened. This asks for an integration of enforcement and communication. In the end this will lead to more compliance and a more environmental-friendly behaviour of companies.

Reading the example above of a compliance incentive program in Santa Rosa (California, U.S.) gives an idea of what an integrated approach of enforcement and communication can look like.

Integrating enforcement and communication is your best guarantee for longterm results. The following chapters elaborate on the question why integration is so important and how it can be accomplished.

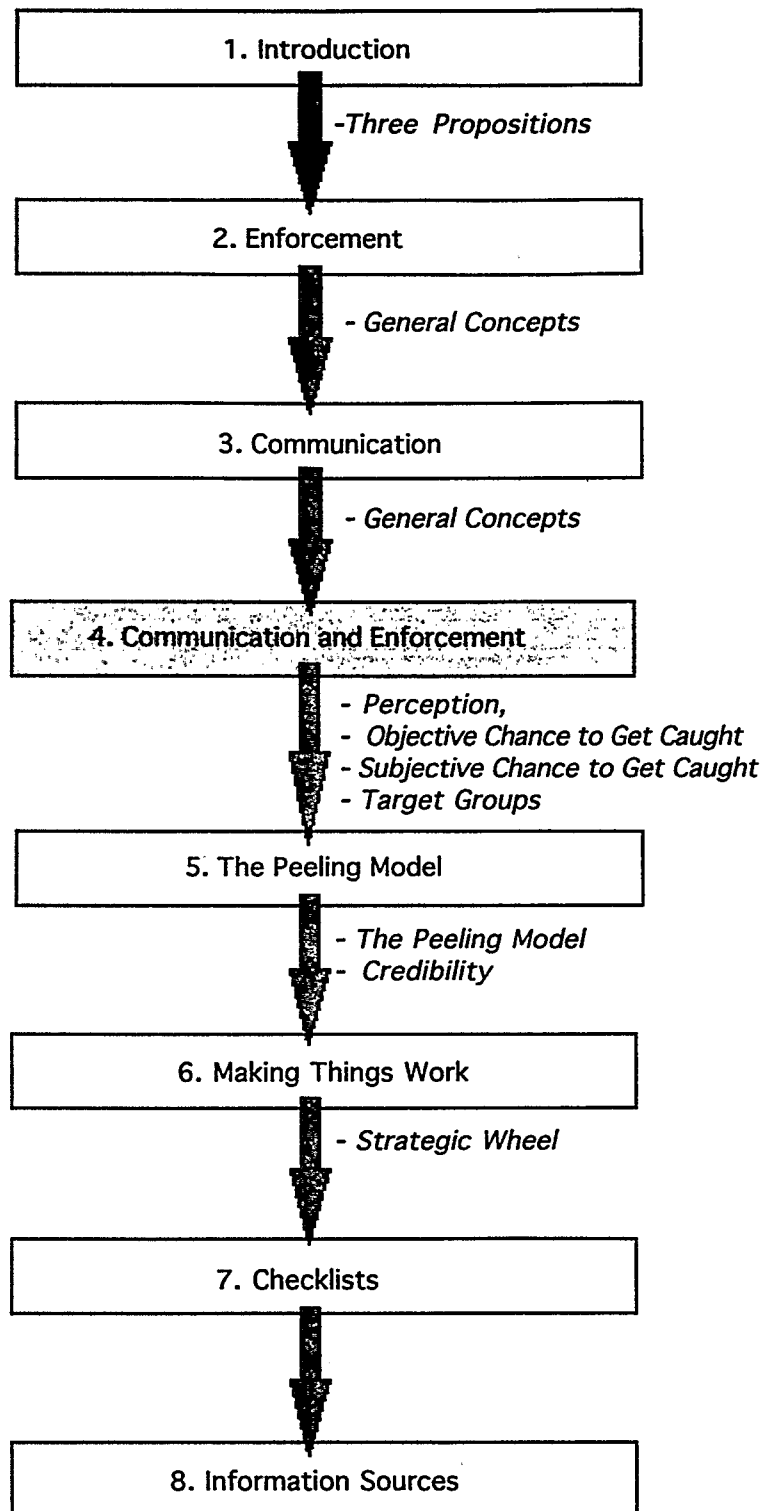
Proposition 1:

"Communication makes environmental enforcement more effective by influencing the perception of the enforcement-action."

-Perception-

- Objective Chance to Get Caught -***
- Subjective Chance to Get Caught -***

-Target Groups-



4 Communication and Enforcement

This chapter is about how communication can make enforcement more effective. The key word in this chapter is, as in our first proposition, 'perception'.

4.1 Chance to Get Caught

An important concept in relation to enforcement is what we call 'the chance to get caught'. The chance to get caught can be defined in two different ways:

1. *The objective chance to get caught*
The statistical probability to get caught when violating the rules.
(also called: the factual/real chance to get caught)
2. *The subjective chance to get caught*
The estimation by the regulated community of the probability to get caught when violating the rules.
(also called: the perceived/ estimated chance to get caught)

What people think, believe, feel, this is what they act upon. Regulated companies will be far more willing to comply if they feel there is a substantial chance they get caught for offending the rules. This feeling is based on their own estimation, their *perception*.

To effect future behaviour of the whole regulated community, it is not enough just to create a substantial objective chance to get caught. It is crucial to make them *see and believe* there is a good chance to get caught if they offend the rules. That's where communication comes in.

Objective and Subjective chance to get caught.

For example: one truck loaded with illegal waste tries to pass the boarder. If one out of every ten trucks' cargo is inspected and this check is 100% waterproof the chance to get caught for a truck with an illegal load is 10%. This is called the objective chance to get caught. The driver has to estimate the chances to pass the boarder without problems.

Basically there are two variations possible in the estimation the truckdriver makes:

- 1. The driver sees each and every cargo-inspection executed during the waitingperiod at the boarder. The perception of the chance to get caught will be high, possibly more then ten percent.*
- 2. The driver has passed the boarders more than twenty times now and has never seen any truck being inspected, because inspections are executed unobtrusively. The estimated chance to get caught will probably not be as high as 10%.*

The estimate the driver makes, wittingly or unwittingly, is called the subjective chance to get caught. It is is this subjective chance that will influence the truckdriver's future behaviour.

4.2 Communication Builds Perception

How communication makes the difference between the objective and subjective chance to get caught is shown in figure 5. This figure depicts how communication levers the objective chance to get caught to an even more effective subjective chance to get caught by influencing perception.

**Figure 4**

From Objective to Subjective Chance to Get Caught

Communication can influence the perception of enforcement in a number of ways. Actual enforcement action is the starting point, communication can make this action *visible*. It can draw attention towards the inspections you undertake and towards the sanctions you issue. It can underline the specific characteristics of your enforcement action. If an inspection of one company leads to tough sanctioning, this of course will be noticed by this company. But if this enforcement action is done in silence there will hardly be any effect on the other companies. Dependant on whether you choose for a more preventive or repressive policy you can draw attention to the chance to get caught or the sanction.

Communication puts a magnifying-glass on the value of your chance to get caught and on the sanction you issue. In 'marketing' this leverage-power of communication has long been acknowledged. Product-value is enlarged by adding emotional value to the objective, rational characteristics of a product. The value of a sports shoe is not just its practical use. Wearing a specific brand of sports shoe can make you feel good. This additional value exists in people's minds. It is a perception created by communication.

Communication can make things attractive, or unattractive. It *colors perception*. The widespread use of advertizing campaigns as an instrument to increase product sales do just that, color perception. How attractive would a bottle of black liquid be without a flashy label and glittering T.V. commercial. These communication elements have made Cola into an attractive product, with billions of buyers. Parallel to a company producing sports shoes or liquids, the enforcement department produces its own product: the enforcement action.

In the same way communication can be used to attract people to buy a product, communication can be used to deter offenders by making non-compliance unattractive. Think about example-setting by publishing offenders' names in the media.

Communication and Perception

A few examples of communication influencing perception of chance to get caught and sanctioning:

Subjective Chance to get Caught

- ***making actions more visible through publicity, letters to companies etc.***
- ***announcing actions in the media***

Sanctioning

- ***publishing results of enforcement actions in the media***
- ***publishing issued sanctions***

Communication can be used to make others perceive your enforcement action and color this perception. This will increase the subjective chance to get caught and the perception of the sanctioning, which most probably influences future behaviour. This is why there should be *No Enforcement without Communication*; the First Basic Rule.

On the other hand it's impossible to create a subjective chance to get caught by communication alone. Perception can't be built on air. If you don't live up to the promises you communicate, communication can prove to be a boomerang and come right back at you. You lose credibility, your communication loses credibility, and you will have a hard time to regain it. *No communication without Enforcement*; the second Basic Rule. The bases of enforcement communication must be an objective chance to get caught combined with a sanction. Together this is the enforcement action. About the factual chance to get caught and the sanctions you can communicate. You can direct attention to the inspections you execute and the fines you issue. This way you amplify the impact on perception.

Of course it's sometimes recommendable to operate more quietly, making the enforcement unpredictable and surprising. You can put it this way: *"You have to do everything you say, but you don't have to say everything you do!"*

4.3 Target Groups are the Market

This paragraph continues the parallel between marketing and enforcement. Marketing never works without a definition of the target group. It is essential to aim your marketing efforts for a specific group with specific needs and preferences. For enforcement it is equally important to focus on a target group. Concentrating your enforcement-efforts on a well defined part of the regulated community, the target group, makes enforcement much more effective.

Before you define your target groups you have to take in account a number of considerations:

1. Risk-potential
2. Environmental priorities (water, waste, land-use, noise etc.)
3. Compliance-reputation
4. Complaints
5. Preventive effect

Target Groups Priorities in Norway

In Norway in the year 1993, 1500 enterprises have been granted discharge permits. In order to get the best possible results from their limited inspection capacity they carefully select the enterprises they inspect or audit. They use the following criteria:

- 1. Enterprises which contribute to environmental problems in areas which are given high priority by environmental authorities.*
- 2. Enterprises with a great potential risk of hazardous discharges.*
- 3. Suspicion of violations.*
- 4. Geographic areas with special environmental problems.*
- 5. Preventive considerations.*

Source: Proceedings Volume 2 Third International Conference on Environmental Enforcement (1994), p. 111-115.

Preventive effect of 'Multinationals'

For a few years compliance in Indonesia was checked through the Minister of Environment incidentally paying a visit to a multinational based in Jakarta. This without exception resulted in a fair amount of publicity. Not only because of the high ranked inspector, but also because of the media-attention for multinationals. In other words, the preventive effect of publicity was at least one of the reasons to select multinationals as target group.

Source: I.W.A.C.O. The Netherlands

Defining target groups gives direction to your enforcement and communication. Keeping your target group in mind, you can choose the most effective combination of action and communication. This same integrated approach of action, communication and target groups we find in the world of business. The way enterprises produce and sell their products teaches the enforcement department a valuable lesson.

In Chapter 7 you can read how to define a target group.

4.4 Communication Puts a Leverage on Enforcement

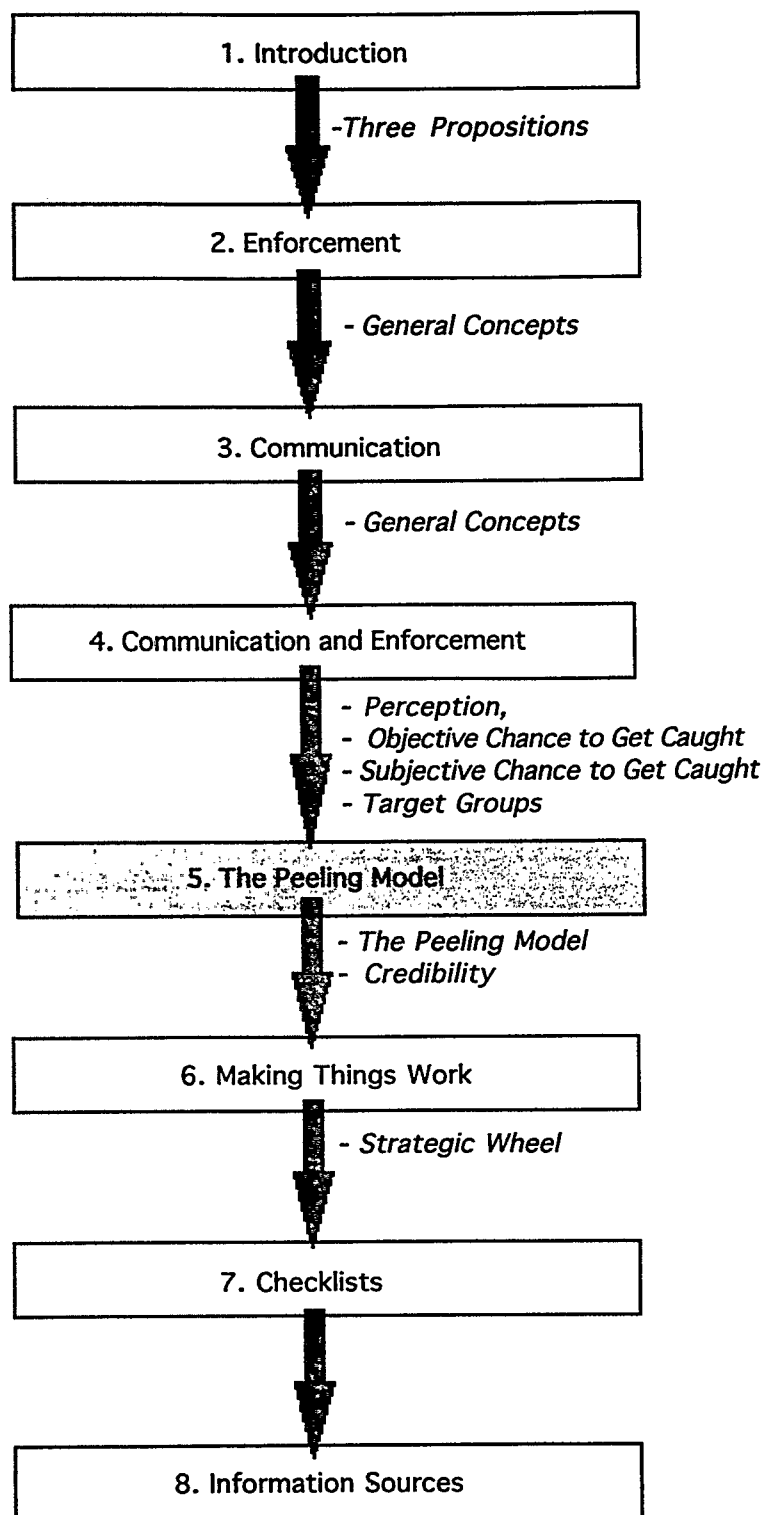
Through communication it is possible to lever the impact of your enforcement action. If done properly, an executed inspection will not just effect the inspected company, it will also have a deterrent effect on other members of the regulated community. Communication makes enforcement visible. Communication spreads the preventive effect of your enforcement -activities out over larger parts of the regulated community. This way compliance is promoted on a larger scale than just the inspected company.

Communication comes in many forms to support the enforcement of the law. The difficulty of using communication as an instrument of enforcement lies in finding an equilibrium between enforcement and communication. In marketing it is common knowledge communication produces the best results if it colors perception in a way that matches your product. Communication and product should create one *consistent image*. It is safe to say the same goes for communication and enforcement action. This demands an integrated approach of communication and enforcement action. This is not all that easy, knowing there are many ways to design your inspection-activities and at least as many ways to communicate with your target group. The Peeling Model in chapter 5 provides you with a systematic approach to tackle this problem.

Proposition 2:

"Communication and enforcement should be integrated."

***- The Peeling Model-
-Credibility-***

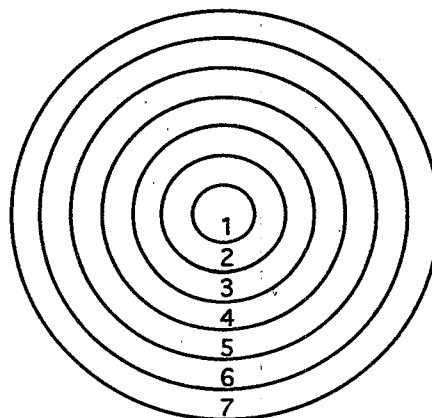


5 The Peeling Model

To optimize the effect on compliance it is necessary to attune action and communication not only to each other but also to the regulated community. In this chapter we present a model for integrating communication and enforcement. The Peeling Model provides you with a systematic guideline. The model is based on a marketing view, looking at enforcement as a product, where communication is a marketing-instrument to sell the product to your target groups.

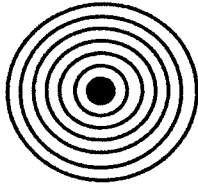
5.1 The Peeling Model: Enforcement in 7 Layers

The Peeling Model consists of six levels of communication laid around the enforcement action.



1. Enforcement action: inspection and sanction
2. Enforcementsignals
3. Enforcement action-communication
4. General enforcement-communication
5. Communication on regulation
6. Educating-communication
7. Topic communication

Figure 5
The Peeling Model



1. Enforcement Action

The heart of every enforcement project must be the enforcement action. The executed inspections and issued sanctions are the 'Bull's Eye' of your enforcement-communication strategy. There is a range of dimensions on which enforcement actions can vary.

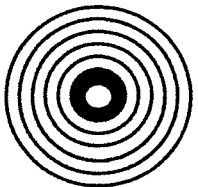
Enforcement Actions:

- inspections:
 - single - multi media
 - personal - written contact
 - selfmonitoring - direct inspections
 - announced - unannounced
 - inspection of whole target group -selection
 - once - more than once
 - inspections equally spread in time - concentrated
- sanctions:
 - fines
 - restoring environmental damage
 - withdrawal of licence

Illegal Waste Transport I

For the Illegal Waste Transport across the boarder a licence is required. Related to this licence is a set of regulations and requirements. To promote compliance with these regulations the Government has decided to intensify inspections at the boarders and along the highways.

Sanctions are dependant on the seriousness of the offences. Besides fines, sanctions can include the withdrawal of the licence for waste transports.



2. Enforcementsignals

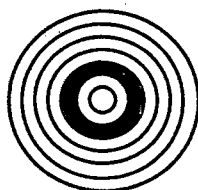
The most elementary form of communication is directly connected to the physical presence of the inspectors. This communication on the spot makes the enforcement directly visible. Visibility is important to raise the awareness and attention for the enforcement effort, especially with the people directly involved. It enlarges the effect on the subjective chance to get caught. To keep the regulated community guessing, it is necessary to alternate between obtrusive and unobtrusive inspections.

Enforcementsignals:

- uniform
- car/ boat/ airplane
- logo/label/seal
- technical equipment

Illegal Waste Transport II

To increase the visibility of the inspections at the boarder inspectors drive cars that can easily be recognized by a logo. Moreover signs, stating 'waste transport inspection' are used to direct drivers to the place where the inspections take place. For inspections on the highway a helicopter will sometimes be used to track illegal transports. Inspectors on the ground than mostly operate undercover, driving in unobtrusive cars. Visibility in this way is varied.



3. Enforcement Action-communication

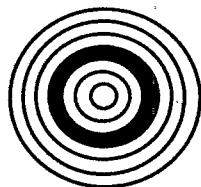
The second layer of communication has specific enforcement actions as subject, but is not directly related to these actions. It increases the visibility of the enforcement action with the inspected member of the regulated community, but even more important, to the other members. Enforcement Action communication spreads the impact of an inspection out over broader parts of the targeted community.

Enforcement Action-communication:

- individual announcements
- announcements of inspection in branchemagazines, newsmedia etc.
- publishing inspection-results and issued sanctions
- public disclosure of names of offenders
- publicity during the enforcement-project
- individual reports of inspection results

Illegal Waste Transport III

Furthermore, the effect of the inspections is enlarged by the use of signs near the boarder. These signs announce the inspection of waste transports. At the same time posters at 'trucker-restaurants' along the road warn for transport inspections. To create awareness of this enforcement action with even larger parts of the regulated community a couple of press releases will create publicity on this issue. On top of this, reporters of national television are invited to visit the 'inspection scene'.



4. General Enforcement-communication

The regulated community is informed in a more general way about the intentions of the environmental enforcement department. New methods of enforcement can be introduced, changing priorities, news about the enforcement capacity etc. Keeping enforcement in general under the attention of the public supports the impact of the inspections executed.

General Enforcement-communication:

- publicity about the enforcement department
- individually informing companies
- publicity about the enforcement policy, priorities and methods
- publicity about new methods of enforcement
- publicity about new technical equipment

Illegal Waste Transport IV

Transportcompanies are informed on the enforcement actions by a brochure. In this brochure the department responsible for the enforcement of the transport-regulations is introduced. The priority of illegal waste transports is made clear and the intended enforcement methodes are explained. Besides this brochure, the same information is also presented in an article in a businessmagazine for transportcompanies. A press release about the spectacular inspections with the use of the helicopter will create extra publicity.



5. Communication on regulation

This layer of communication is not directly connected to the enforcement-methods. Communication on regulation explains the rules of the game. This informative function is the bases of a good enforcement. Without knowledge of the rules compliance can not be achieved.

Communication on regulation:

- information brochures
- informative meetings/ company visits
- speeches of the minister introducing new rules
- announcing higher sanctions

Illegal Waste Transport V

To inform the transportcompanies on the regulations attached to the licence for illegal waste transports a videofilm and accompanying leaflet are sent to branche organisations and individual companies.



6. Educating-communication

Through use of different media it is tried to educate the regulated community to comply to the environmental regulations. Not because of possible sanctioning when they don't comply but out of understanding and support for the environmental policy. It is aimed at achieving knowledge about and a positive attitude towards environmental regulations. This enhances the credibility of your enforcement.

Educating communication:

- publicity campaigns with argumentation of regulations
- brochures
- informative meetings
- conferences

Illegal Waste Transport VI

In order not only to inform on, but also to build understanding of and support for, the regulations and its enforcement, transport companies are invited to attend a special conference on transport and (environmental) regulations. At this conference the reasoning behind the regulations and the enforcement is explained. The press is also invited at this conference.



7. Topic communication

The outer layer of the peeling model brings a specific environmental problem to the attention of the community. It makes it an issue of concern; puts the topic on the agenda. Through this agenda-setting support for the regulations and willingness to comply is stimulated. Like educating communication it supplies the enforcement with credibility and acceptance.

Topic communication:

- publicity campaigns about environmental problems
- reports on environmental problems
- articles in magazines
- discussions on T.V. and in newspapers

Illegal Waste Transport VII

To put the issue of illegal waste transports and its environmental dangers on the public and media-agenda, several reports on this topic are published. National publicity is created through interviews given by the responsible ministers (of the Environment, of Justice and of Traffic & Transport) on television and in newspapers.

5.2 Layers Reinforcing Each other

In §5.1 the different layers are discussed separately. In reality they are interrelated. If the relation between every layer is consistent they reinforce each other. If there is no cohesion between the separate levels, or worse, if they contradict each other, the effectiveness of the enforcement will suffer from it.

Moving from one layer to the other, we shift gradually from the enforcement department as sender (layer 1-4) towards the Government as sender (5-7).

This manual is mainly about layer 1-4. In layer 5-7, with the Government sending the message, the focus lays on informing the regulated community and changing attitudes. Layer 1-4, related to the enforcement action, concentrate on influencing behaviour directly. How these layers can be molded in one consistent and effective product of enforcement and communication is the subject of the next chapter.

5.3 The Credibility Trap

When using the Peeling Model it is tempting to scare the regulated community with announcements of inspections and a lot of publicity on planned enforcement projects. This seems a relatively inexpensive way to improve the compliance rates, without executing too many inspections. On the short term this can indeed be effective. However on the long run this will be contra-productive. Enterprises start to notice you are not actually living up to the expectations you create. In the end the regulated community ignores your communication. This is what we call the *boomerang-effect* of communication. You've lost your credibility. This dilutes the power of enforcement in general and communication in particular. Credibility doesn't stop at enforcement: if enforcement loses credibility it tiggles down to environmental policy and vice versa.

The credibility trap should always be avoided. To accomplish longrun effectiveness you should stick to the basic Rules of Enforcement:

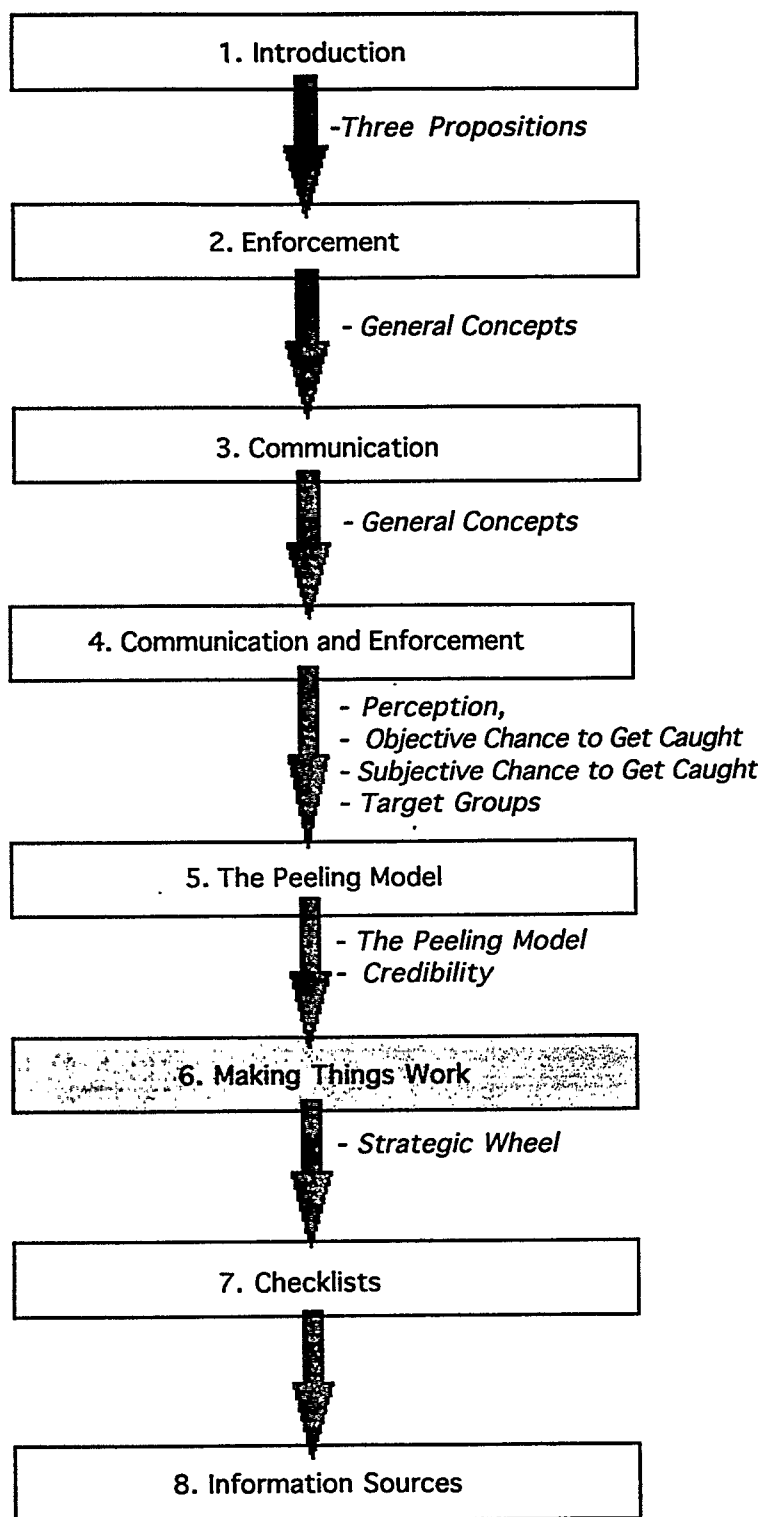
1. *No Enforcement without Communication*
2. *No Communication without Enforcement*

This chapter presented a model for integration of enforcement and communication. In practice, this demands a strategic approach. Chapter 6 explains what a strategy is and helps you to develop and implement an effective enforcement-communication strategy. It puts the Peeling Model in practice.

Proposition 3:

"A strategic approach of both enforcement and communication is a prerequisite for succes."

- The Strategic Wheel -



6 Making Things work

A strategic approach is necessary to realize integration of enforcement and communication as described in the former part of the manual. A strategic approach implies developing a strategy based on good analyses. There is no such thing as 'one best strategy'. In this chapter the *Strategic Wheel* is presented. This strategic process brings along some crucial questions which should be answered. The checklists, presented in chapter 7 can help you with this.

6.1 The Strategic Wheel

A strategic approach in practice means short and especially longterm objectives should be formulated related to specific target groups. There must be an enforcement plan or pattern which consists of six basic elements:

1. Analyses
2. Target group definition and objective setting
3. Product development¹
4. Organisation
5. Execution
6. Evaluation

¹In the case of enforcement, 'product development' is combining enforcement actions and communication actions.

The strategic enforcement process is depicted below. We call it the *Strategic Wheel*. In this wheel it is analyses that keeps it all together. The outer part of the wheel concerns the choices you have to make.

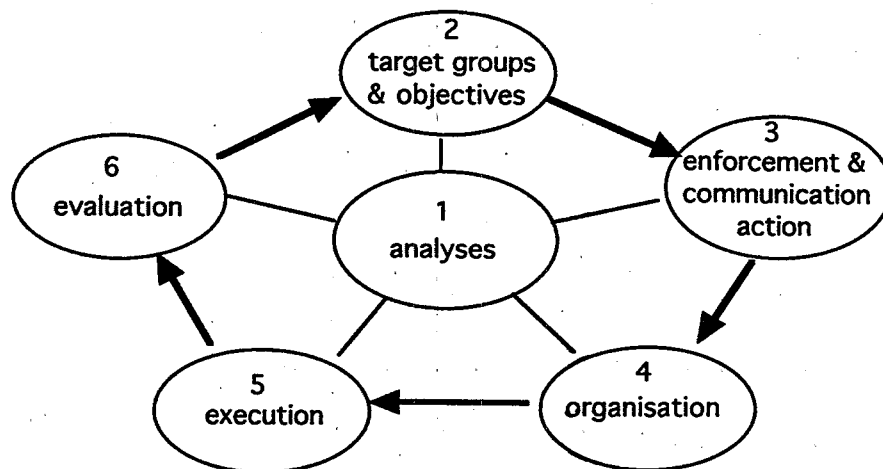
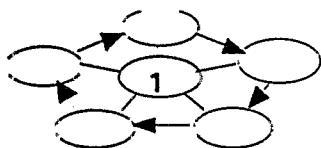


Figure 6
The Strategic Wheel



1. Analyses: A Never Ending Starting Point

The foundation of strategic enforcement planning should be a continuous process of analyses. First of all it's important to have a clear view on your starting position, external as well as internal. Every environmental enforcement situation is different from the other, demanding a different strategy. That's why a good strategy development needs an analyses of the situation. This first analysis is the starting point on which you base the consecutive choices you have to make.

Externally this means making an inventarisation in the gross of the present situation of the environment and of compliance. What positive developments, can you discern? What are the negative ones? Internally you should ask yourself what the strong points are of the present enforcement and where the weak spots are.

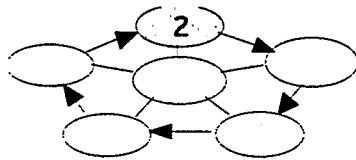
It's important to understand analyses never stops. Every other phase in the strategy process brings a need for new or more detailed information. Analyses must be a continuous process. New information comes in and old information must be refined. During the strategy process your analyses evolves to an evermore detailed level. At the same time more fundamental changes in the situation can be processed.

The analyses can be divided in an external and internal part. Both are subdivided in problem and fieldmap, as presented in the following matrix.

Basic Questions:

	problem	field map
external	What: * is the issue? * is the environment-problem? * is the environmental policy? * are the regulations? * kind of licensing? * is the specific context?	Who: * are the target groups? * are the organizations? * are the persons responsible? * are the intermediaires? * are the 'third parties'?
internal	What: * are the time conditions? * are the financial resources? * are the human resources?	Who: * is directly involved? * is responsible? * executes? * is indirectly involved?

See also checklists 1 & 2.



2. Target Groups and Objectives: Determine Your Results

Making the Strategic Wheel spin starts with the determination of objectives and target groups. Defining objectives and target groups gives direction to your enforcement-strategy. It helps to focus your enforcement efforts. This is especially important because every enforcement department has to deal with limited enforcement capacity. Formulating objectives also gives you the opportunity to evaluate the progress you make.

Objectives and target groups are closely intertwined. An objective determines the target group, the target group determines the objective, see figure 9. Determining your results is always a combination of both objective and target group.

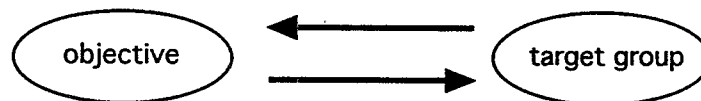


Figure 7
Objective and Target Group

Target groups and objectives can be discerned on three levels, see figure 10:

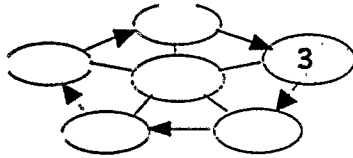
Level	Examples of Target Groups	Objectives
1. Enforcement Policy	Chemical Industry Car-dismantlers	Compliance
2. Enforcement Action	Five Biggest Companies Companies in District X	Number of Inspections Chance to Get Caught Issued Sanctions
3. Communication Action	Company Management Workfloor Public	Attention Knowledge Attitude Intention Behaviour

Figure 8
Three Levels of Target Groups and Objectives

Basic Questions:

- What is your target group on each level?
- What objective do you formulate on each level?

See Checklist 3 & 4.



3. Product Development: Combining Enforcement and Communication

To reach your objectives within your target group you need a product; a combination of enforcement action and communication. This combination must be attuned to your target group and objective. To achieve this, there are a number of inspection varieties available, together with a wide range of different kinds of communication.

Basic Questions:

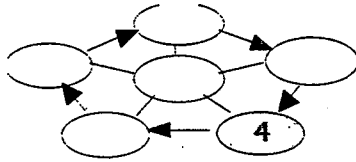
Enforcement

- = What is the objective of the enforcement?
- = What are the characteristics of the target group?
(like: size of target group, location, level of compliance etc.)
- = Which Enforcement Action best fits the target group and objective?
- = How do you plan your enforcement action?
- = Who is responsible for the actions?

Communication

- = What is the objective of the communication?
- = What are the characteristics of the target group (audience)?
(like: size of target group, media-use, attitude towards regulations etc.)
- = Which Communication Action best fits the target group and objective?
 - = On which level do you communicate?
(layers in peeling model: signals, enforcement action communication, general enforcement communication etc)
 - = Which media do you use?
(printed press/ TV/Radio, written and/or personal communication)
 - = What do you communicate?
(message, tone of voice)
 - = When do you communicate?
(before , during, after enforcement action)
 - = Who's the sender?
(government, the enforcer etc.)

See Checklist 5, 6 & 7.



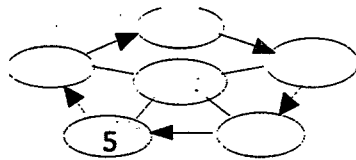
4. Organisation: A Crucial Element

An important part of the strategy is a good organisation. Organisation must bring mutual adjustment between enforcement and communication in practice. Preferably this is done by project-organisation. This brings enforcement skills and communication skills together in project teams. Getting organised starts with making a plan, which answers the basic questions.

Basic Questions:

- *Who are the members of the project team?*
- *What tasks should be executed?*
- *Who is responsible for which task?*
- *How is coöperation and coördination accomplished?*
- *What is the time-schedule?*

See checklist 8.

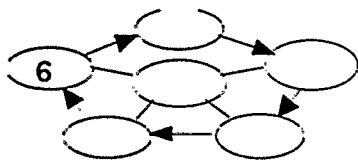


5 Execution: Flexibility, Creativity and Skills

Every strategy, how well planned and organised it may be, is worthless without execution. Preperation won't help you, if you don't have the skills, creativity or time to execute your strategy.

Besides skills and creativity the execution of enforcement and communication demands flexibility. You must be able to make use of recent developments, react to changing situations etc. In times like this, where developments go ever so fast, you must be able and prepared to adjust. This demands continuous monitoring of the progress you make.

For the succesful execution of your communication checklist 9 presents some general tips.



6. Evaluation: a powerfull instrument

In practice not much attention is paid to the evaluation of enforcement and communication-actions. But evaluation is a powerfull instrument. First of all it shows the results you have achieved. Secondly, these results are important input for your communication (you can show good and bad examples). And finally and maybe most important it gives you the opportunity to judge the effectiveness of your strategy and make adjustments if neccessary.

Like analyses, evaluation is a continuous process. Keeping a constant eye on the effectiveness of your enforcement-communication strategy is necessary. Comparing results with the objectives you've set puts a check on your strategy. Results deviating from your objectives can point to problems within one or more of your strategic elements, like: incomplete analyses, confusing target groups, unrealistic objectives, ineffective enforcement-communication combination, massy organisation, lacking communication skills or badly performed evaluation.

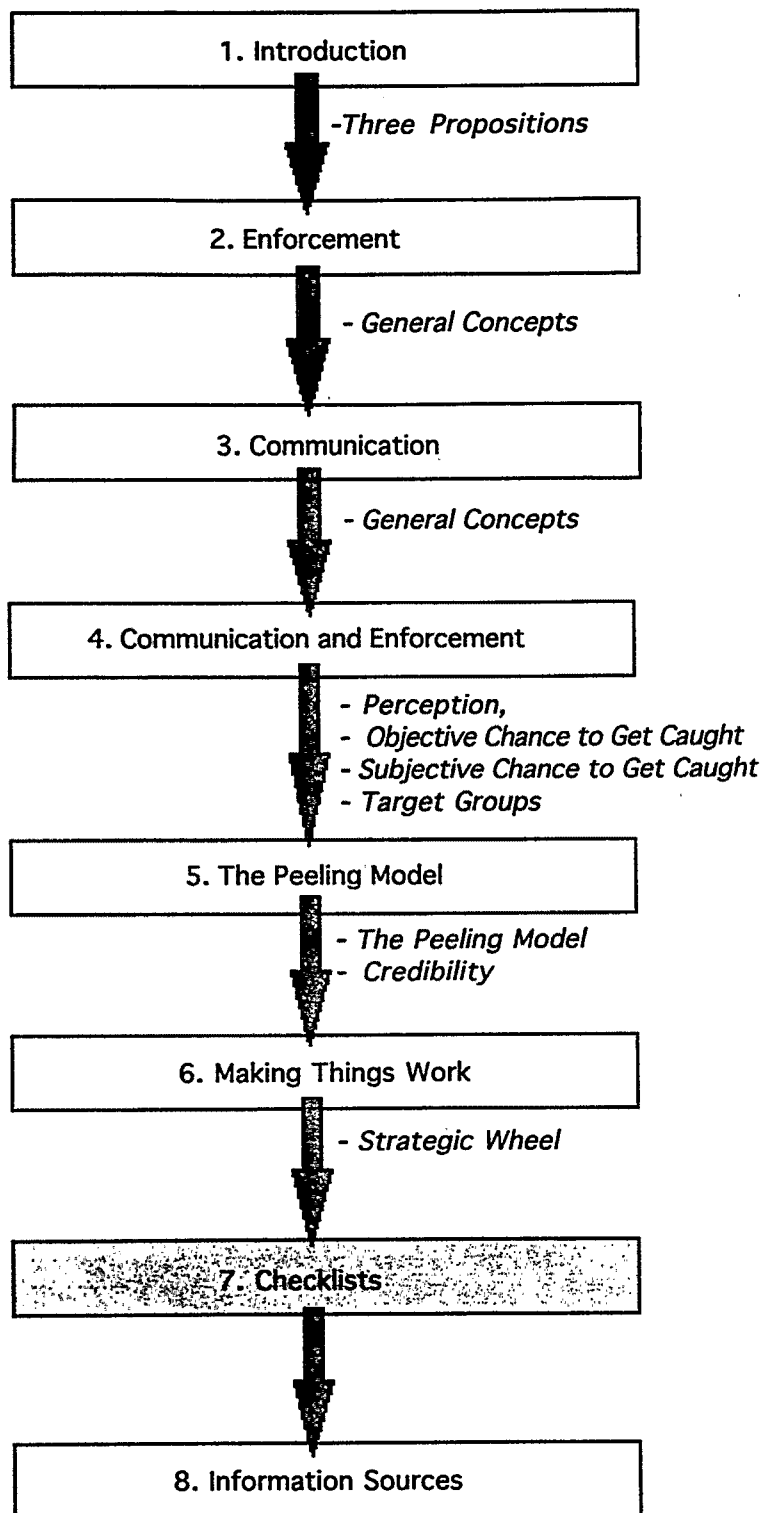
Evaluation can be devided in process and effect evaluation. process evaluation focuses on the progress the project makes. Effect evaluation compares results with objectives.

Basic Questions:

- = What are you going to evaluate?
- = How are you going to evaluate?
- = Who is going to evaluate?
- = When are you going to evaluate?

See Checklist 10 & 11.

Checklists



7 Checklists

This chapter contains 11 checklists which can help you to put the strategic wheel in motion. The checklists are:

- I. Analyses
 1. External Analyses
 2. Internal Analyses
- II. Target Groups and Objectives
 3. Select Target Groups
 4. Formulating Objectives
- III. Enforcement and Communication Product
 5. Dimensions of Enforcement Actions
 6. Dimensions of Communication Actions
 7. Characteristics of Communication Instruments
- IV. Organisation
 8. Basic Elements of Organisation
- V. Execution
 9. Tips on How to Communicate
- VI. Evaluation
 10. process evaluation
 11. Effect evaluation

Checklist 1

External Analyses

The external analyses gives you a clear view on different aspects of the environmental problem and the relevant regulations. It will also help you to identify the members of the regulated community with whom you have to deal.

Key Items of External Analyses

1. The Environmental Issue

- What is the issue?
- What is the effect on the environment?

2. The Environmental Policy

- What is the policy concerning this issue?
- Is it a priority for the environmental policy?
- What are the general objectives concerning this issue?
- Which (policy) instruments and measures are available?

3. The Environmental Regulations

- What are the relevant regulations?
 - international
 - national
 - regional/local
- What are the possible sanctions?

4. The Regulated Community

- Which companies?
- How many?
- Where are they located?
- What are their economic and organisation characteristics?
- Who is responsible concerning this issue?

5. Concurrent activities

- Are there any other relevant enforcement actions concerning the same field during this period?
 - Are there any other relevant communication actions concerning the same field during this period?
-
-

Checklist 2

Internal Analyses

Internal analyses helps you to define the conditions under which you have to perform the enforcement and communication actions. At the same time it maps the people who are involved.

Key Items of Internal Analyses

1. The Enforcement Policy

- What are the main principles and objectives of the enforcement policy?
- What are the present priorities of the enforcement policy?
- Which enforcement instruments are being used?

2. The Enforcement Conditions

- What is the time and budget available?
- How much inspection capacity is (when) available?
- What is the level of experience and know-how in general?
- What is the level of experience and know-how concerning this issue?

3. The Enforcement Responsibilities

- Who is responsible for the enforcement in general?
- Who is responsible for the enforcement in this particular case?

4. The Communication Policy

- What are the main principles and objectives of the enforcement-communication policy?
- What are the present priorities of the communication policy?
- Which enforcement instruments are being used?

5. The Communication Conditions

- What is the time and budget available?
- How much communication-capacity is (when) available?
- What is the level of experience and know-how in general?
- How is the relation between communicators and enforcers?

6. The Communication Responsibilities

- Who is responsible for the communication in general?
 - Who is responsible for the communication in this particular case?
-
-

Checklist 3

Select Target Groups

Target groups can be selected on three different levels:

1. Enforcement Policy
2. Enforcement Action
3. Communication Action

Analyses and selection of each target group should include the following considerations:

Key Items of Target Group Analyses and Selection

1. Structure of the Target Group

- How many members?
- What are their main, relevant characteristics?
 - individuals / organisations,
 - economic activity
 - etc.

2. Relation to the Environmental Problem

- What do they know about the environmental issue at hand?
- Do they care about the environmental problem?
- Do they take measures to protect the environment?

3. Relation to the Environmental Regulations

- What do they know about the relevant regulations?
- How do they feel about the regulations?
- What are the consequences of these regulations for the target group?
- Do they comply?

4. Relation to the Enforcement Policy

- What do they know about the enforcement policy?
- How do they feel about the enforcement policy?
- Are they influenced by the enforcement policy?

5. Media Use

- Which media are used by your target audience?
- How reliable and credible are these media?
- What is the outreach of these media?

6. Information Need

- Which questions does your audience have?
- Are these questions relevant in relation to the issue at hand?
- What information does your audience need?

7. Intermediaires

- How is your target audience organised?
 - Are there institutes, organisations and/or individuals through which you can reach your audience?
-
-

Checklist 4

Formulating Objectives

Objectives can be formulated at the same three levels as the target groups:

1. Enforcement Policy
2. Enforcement Action
3. Communication Action

At each level the objective-formulation should be:

Formulation of Objectives

1. Target Group Related

- With whom do you want to reach the desired effect?

2. Measurable

- Is it in future possible to check whether you achieved your objective?
- How are you going to check your results?
- Can you measure your results objectively?

3. Specific and quantified

- Can you quantify your objective?
- Is your objective specific and easy to work with?

4. Time-related

- Is it clear at what moment the objective must be achieved?
- Have you defined any landmarks during the process?

5. Motivating

- Is the objective (perceived to be) challenging but realistic?

6. Clearly Stated

- Is the objective easy to communicate?
 - Is there only one interpretation of the objective possible?
-

Examples of Objectives:

1. Level of Enforcement Policy:

Within two years 75% of the car-dismantlers in the Netherlands must be in full compliance with the regulations, stated in the Waste Substances Act. After four years this must be 85%.

2. Level of Enforcement Action:

The first year 100% of the car-dismantlers in the Netherlands must be paid an informative and first-inspection visit to register and warn non-compliers. During the next year 100% of all registered non-compliers should be inspected and if necessary sanctioned. The next two years car-dismantlers must be inspected every 6 months. If violations are found sanctions should be issued and an inspections should take place within 3 months.

3. Level of Communication Action:

Within one year 95% of the car-dismantlers in the Netherlands must be known with the environmental regulations concerning their company and be aware of the intentions to intensify the enforcement of these regulations. After two years they must estimate the chance to get an inspection as being "(reasonably) high" and 95% must state to have the intention to comply.

Checklist 5

Enforcement Action

In relation to your objectives and target groups you can shape your enforcement action. Variations on the following dimensions are possible:

Dimensions of Enforcements Actions

1. Kind of Inspection: Single or Multi-media

- Is it possible to execute multi-media inspections?
- What are the advantages of multi-media inspections in this case?
- What are the disadvantages of multi-media inspections in this case?

2. Procedure: Announced or Unannounced

- Is it possible to announce the inspections?
- What are the advantages of announced inspections in this case?
- What are the disadvantages of announced inspections in this case?

3. Intensity: Once or More than Once

- Do you have the resources to inspect more than once?
- What are the advantages of more than one inspection in this case?
- What are the disadvantages of more than one inspection in this case?

4. Equipment

- What equipment do you have and how effective is it?
- Does this equipment influence your communication possibilities? (helicopter, car, thermometer etc.)

5. Surprise: Expected or Unexpected

- How can you make the inspections surprising?
- Does a creative unexpected approach increase your impact?
- Can you add newsvalue by a creative unexpected approach?
- Are you taken serious?

6. Time spread: Concentrated or Large Spread

- How is your inspection-capacity spread over time?
- What do you gain by short periods of intense inspections?
- What do you loose by short periods of intense inspections?

7. Contact: Written or Personal

- Can you achieve eye to eye contact?
- What do you gain by personal, eye to eye contact?
- What do you loose by personal eye to eye contact?

8. Sanctions

- What kind of sanctions do you issue? (ex.: fines, licence withdrawal)
 - How much time goes by between detection and the sanctioning?
 - Do you relate sanctions to the caused pollution? (ex.: cleaning, restore damage)
 - How do you treat repetition of offences?
-
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Checklist 6

Communication action

In relation to your objectives, target groups and enforcement action you can shape your communication action. Variations on the following dimensions are possible:

Dimensions of Communication Actions

1. Media:

- ☐ *publicity*
 - ☐ *written*
 - ☐ *personal*
- (*characteristics of media* see checklist 7)

- How does the target group normally get their information?
- What's the best way to attract the attention of the target group?
- Are there any specific media used by the target group?
- Which kind of media best serve this project?
- What different frequencies and deadlines best fit your planning?
- What in-house-experience in communication do you have?
- What are the financial and human resources available?

2. Message:

- ☐ *problem*
- ☐ *policy*
- ☐ *enforcement*
- ☐ *regulation*
- ☐ *inspections*
- ☐ *sanctions*

- What does the target group know about the environmental problem?
- What does the target group know about the environmental policy and regulations?
- What does the target group know about the environmental enforcement?
- What is the attitude of your audience towards those issues?
- Is the objective to influence attention, knowledge attitude, intention and/or behaviour?

3. Timing

- ☐ *before*
- ☐ *during*
- ☐ *after*

- When do you get the most attention for your message?
- What timing maximizes the newsvalue?
- Are there possibilities to communicate before, during and after the enforcement action?
- Does communication before the enforcement action increase or decrease the impact?
- Is it possible to prolong the effect of enforcement action by 'follow up communication'?

4. Sender

- ☐ *Government*
- ☐ *politician*
- ☐ *enforcement department*
- ☐ *inspector*

- Which sender would create newsvalue?
 - Which sender has authority for the target group?
 - Where is the most experienced and appropriate communicator?
 - Where are (human) resources available?
-
-

Checklist 7

Communication Instruments

Characteristics of Communication Instruments

Instrument	Objectives					Characteristics
	attention	knowledge	attitude	intention	behaviour	
publicity						
Press release	x	x	x			informative controlled up to date variable outreach
Radio item	x		x			limited information high outreach short
TV item	x	x	x			high impact high outreach short
Magazine	x	x	x	x		target group directed informative documentation function
written communication						
Letter	x	x	x	x		personal high attention value informative individual
Brochure		x	x			one-way communication informative controlled documentation function
personal communication						
Training/course		x	x	x	x	two way communication high involvement intensive information target group directed
Personal Meeting	x		x	x		individual high impact maximum feedback controlled
Group Meeting	x	x	x			interactive target group formal
Lobbying				x	x	informal interactive personal

Checklist 8

Organisation

In order to attain a well coördinated and adjusted set of enforcement and communication actions special attention must be paid to the organisation of the project. This concerns five basic elements:

Basic Elements of Organisation

1. Activities

- What actions are you going to take?
- Which tasks have to be fulfilled?

2. Responsibilities

- Who are the projectmembers?
- Who is the projectleader?
- Who is involved in the execution?
- Who is executing which task?

3. Structure

- In what structure do you operate?
- Do you create a projectteam?

4. Internal Communication

- How do you accomplish coöperation and coördination?
- Who should be informed within the enforcement and environmental department?
- How do you inform them?
- Which other parties do you work and communicate with?

5. Planning

- When do you plan to take action?
 - What asks for preparation, how long in advance?
 - Is it a temporary project or a permanent activity?
 - Have you planned your follow-up?
 - Did you plan your evaluation?
-
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Checklist 9

Execution

Organisation must be followed by execution. The quality of the execution makes the difference between success and failure. In order to assure a good quality of communication the following tips can be helpful.

Tips on How to Communicate

1. Press/Publicity

- Speak with one voice; assign one individual to coordinate and communicate
- Build and maintain good relations with the press
- Create newsvalue, by planning unexpected and conspicuous actions
- Prepare your press presentations
- What is your point?
- What does the press want to know?
- Which questions can you expect?
- Provide yourself with correct back-up documentation
- Keep it simple
- Know the deadlines of your audience.
- Pick your medium carefully
- Make your message attractive, media-genic

2. Written media

- Attune content and style of writing to your audience
 - Structure your text
 - Extensive texts should include a 'contents/index', an 'abstract' and a 'readers guideline'
 - Formulate clear and concise
 - Use simple words and short sentences (15 words on average)
 - Balance text and illustrations
 - Pay ample attention to a good lay-out
 - Keep in mind the time needed for development and production of the material
 - Ask yourself, beforehand how you distribute your material:
 - on request
 - as direct mail
 - as additional information to other reports
 - stocking material at 'hot' locations
 - hand-out personally
-
-

Checklist 10

process Evaluation

The value of process evaluation lies in the insight it can give you in the way the project is progressing. Furthermore process evaluation learns you how every part of the strategic wheel is functioning. Are there any bottle necks in the analyses, target group and objective formulation, selected enforcement and communication actions organisation, execution or evaluation?

process evaluation of the Enforcement and Communication Project

- ☐ How did preparation, execution and follow-up work out?
- ☐ What can we learn from this for future activities?

Key Questions of process Evaluation:

1. What do you want to know?

- costs compared to budget
- execution compared to planning
- efficiency of human resources
- media- outreach
- efficiency of technical equipment/logistics
- opinion of employees on cooperation, internal communication etc.

2. How are you going to know this?

- surveys
- desk research and administration
- (informal) talks with employees
- measurement

3. Who evaluates?

- internal or external agency

4. When do you evaluate?

- Determine in advance at what moment you evaluate
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Checklist 11

Effect evaluation

Effect evaluation makes it possible to compare the results of your activities with the objectives you've formulated. Because objectives can and should be formulated at different levels, you should also evaluate on these different levels.

Effect Evaluation of the Enforcement and Communication Project

- What effect did you sort with your enforcement and communication activities?
- What can we learn from this for future activities?

Key Questions of Effect Evaluation:

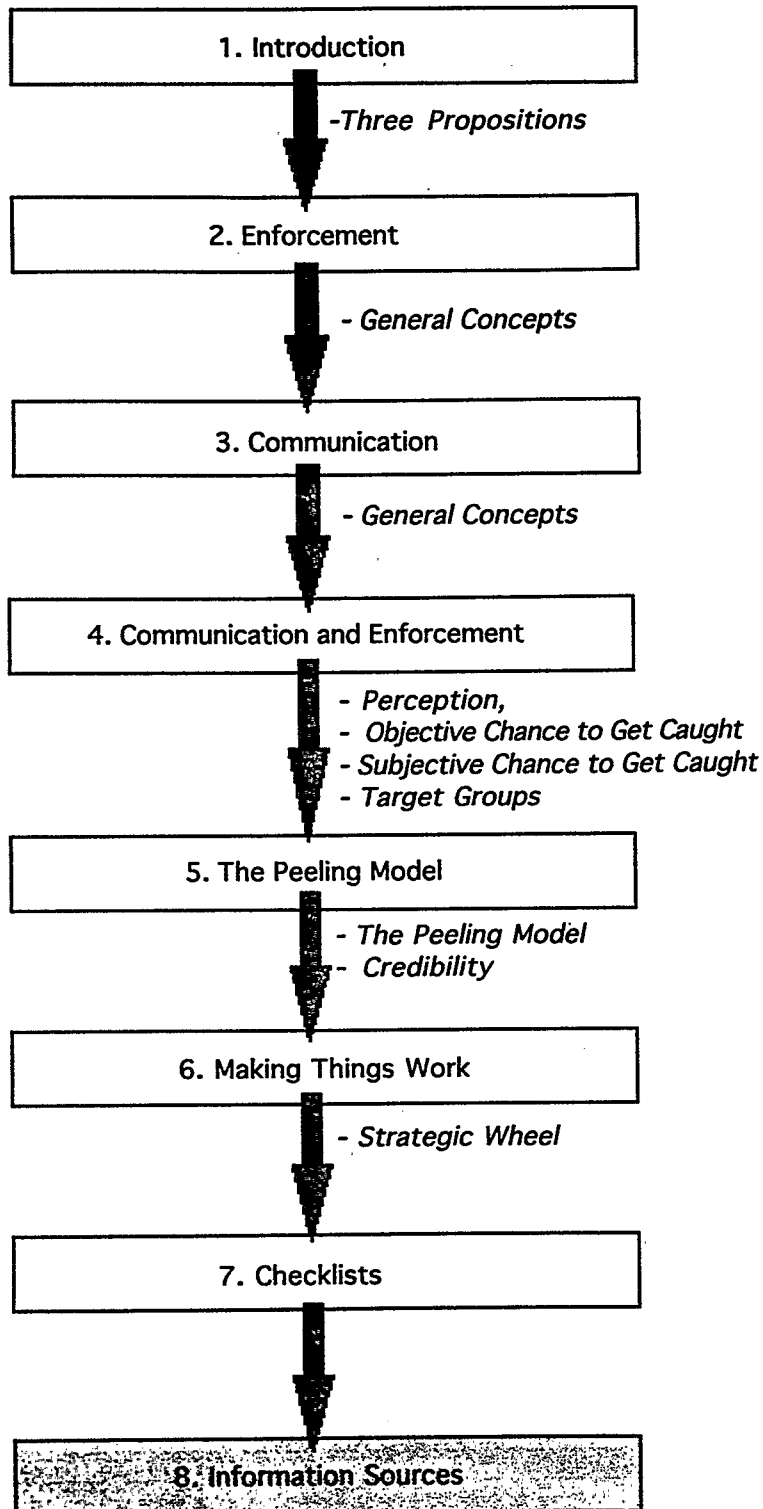
1. What do you want to know?
 - effect on attention
 - effect on knowledge
 - effect on attitude change
 - effect on intended behaviour
 - effect on behaviour/ compliance
 2. How are you going to know this?
 - quantitative and/or qualitative research
 - desk research and administration
 - surveys
 - measurement
 3. Who evaluates?
 - internal or external agency
 4. When do you evaluate?
 - Determine in advance at what moment you evaluate.
-

Tips on the evaluation in general

- Make sure your evaluation matches the objectives you've set.
 - Integrate the evaluation of communication and enforcement.
 - Choose an evaluation method which fits the size of your project.
 - Your evaluation should conclude with tips for the future.
 - Elaborated research should be done by a specialised agency.
 - Evaluation costs time and money.
 - Make sure your evaluation is objective
 - Don't evaluate for the sake of evaluation but to do better in the future.
 - Take someone objective and not responsible for (parts of) the project.
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Information Sources

- Documentation on Enforcement-
- Documentation on Communication-
- Documentation Centers-
- Institutes-



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