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# Policy and political consequences of mandatory climate impact assessments: an explorative study of German cities and municipalities

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## ABSTRACT

Since May 2019, several German cities and municipalities have declared a ‘climate emergency’, an action which makes climate impact assessments mandatory for all projects or policy proposals. How have the processes in the local governments changed in response to the emergency status? How have the processes in the city and municipal councils changed? And how, if at all, has the relationship between elected politicians (who make up the city and municipal councils) and bureaucrats (who make up the local government) changed? Based on 13 interviews carried out with representatives of city and municipal councils and local governments, we show, first, that local governments expect a higher workload and to spend more time on cross-sectoral coordination and cooperation. Second, the issue of climate change is now part of the political agenda in the local councils. Third, the administrative actors are now in a stronger position vis-à-vis the political ones as they can de facto veto projects or policies. Overall, we conclude that local-level climate politics has changed following the declaration of the emergency status; however, the design of the corresponding policies has not changed to reflect the cross-sectoral character of responses to climate change.

## Keywords

bureaucracy; climate emergency; climate impact assessment; horizontal policy integration; local government; local parliament

## Introduction

The fight against climate change has regained public and political attention because of the awareness raised by activist groups such as Fridays for Future (Jung, Petkanic, Nan, & Kim, 2020) and Extinction Rebellion (Westwell & Bunting, 2020). Most of the public campaigning has relied on the 15th Special Report of the International Panel on Climate Change (IPCC) and has highlighted the various risks of not meeting the temperature threshold introduced by the 2015 Paris Agreement (Asayama, Bellamy, Geden, Pearce, & Hulme, 2019). In response to the growing public demand for climate action, several cities and municipalities in particular have declared a ‘climate emergency’.

In Germany, the number of local governments declaring a climate emergency rose drastically within a single year. Starting with the city of Constance (German: Konstanz),

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which passed a resolution to declare a climate emergency on 2 May 2019, around 70 German cities and municipalities followed this example by declaring an emergency status (Hirschl & Pfeifer, 2020). The declaration of a climate emergency indicates that local policymakers have recognized the need for climate action. While there is variation concerning what exactly the declaration of a climate emergency entails for policymaking at the local level, the one common element is that a future decision on a project or policy proposal will depend on the outcome of a mandatory climate impact assessment (see also European Parliament, 2019). Climate impact assessments represent one form of policy appraisal that examines the integration of climate change into mainstream policymaking (Tosun & Lang, 2017). Consequently, climate impact assessments represent one instrument for attaining the horizontal coordination of a set of sectoral policies (e.g. Russel & Jordan, 2009; Russel, Turnpenny, & Jordan, 2018; Schout, Jordan, & Twena, 2010).

Theoretically, we regard the obligation to carry out climate impact assessments as an ‘exogenous’ shock to policymaking in cities and municipalities and expect that this instance of policy change has itself altered how elected politicians and bureaucrats act as well as how they interact with each other. This overall expectation is motivated by Lowi’s thesis that ‘policies determine politics’ (Lowi, 1972), which we apply to the study of policy appraisal.

How have the processes in the local governments changed in response to the emergency status? How have the processes in the city and municipal councils changed? And how, if at all, has the relationship between elected politicians (who make up the city and municipal councils) and bureaucrats (who make up the local government) changed?

To address these research questions, our explorative analysis draws upon 13 interviews carried out with representatives of the local councils and governments of six cities. We find that, first, local governments expect a higher workload and to spend more time on cross-sectoral coordination and cooperation. Second, the issue of climate change is now part of the political agenda in the city and municipal councils. Third, the administrative actors are now in a stronger position vis-à-vis the political ones as they can de facto veto projects or policy proposals.

The analytical perspective adopted offers three main contributions to the literature. First, we advance the literature on policy appraisal by concentrating on two sets of actors – namely elected politicians and bureaucrats – and their interactions, which provides a deeper understanding of the policy process (e.g. Turnpenny, Radaelli, Jordan, & Jacob, 2009). Second, we study the consequences of the obligation to strive for climate policy integration for local politics – which deviates from the analytical focus of most studies on climate policy integration, as these tend to investigate whether the consideration of climate impacts of sectoral policies is ‘sufficient’ (e.g. Dupont & Oberthür, 2012). Third, our findings complement the literature on the role of cities and municipalities in governing climate change beyond their participation in transnational city networks such as the European Union (EU) Covenant of Mayors (e.g. Domorenok, 2019).

The remainder of this study proceeds as follows. First, we provide background information on climate impact assessments and their relationship to climate policy integration in order to set the stage for the subsequent analysis. Then we present our theoretical argument in detail and subsequently, we explain our methodological approach. Next, we present and discuss our key empirical findings in light of the

theoretical considerations. In the final section, we summarize the main insights and present some concluding remarks.

### **Climate impact assessment and climate policy integration**

Policy appraisal became a subject of research in comparative public policy in the 2000s, in the context of debates on ‘new’ policy instruments for environmental governance (Turnpenny et al., 2009). In this regard, scholars also started to pay attention to the conceptualization of policy appraisal. One of the most influential conception was put forward by Owens, Rayner, and Bina (2004, p. 1944), and it defines policy appraisal as a set of *ex ante* techniques for predicting and evaluating the consequences of policy activities with a view to informing policymaking (see also, e.g. Hertin et al., 2009). This family of techniques includes impact assessments concentrating on regulation in broad terms (that is, regulatory impact assessments) or on specific policy goals such as environmental protection or climate change (Adelle, Jordan, & Turnpenny, 2012; Turnpenny et al., 2009). Effectively, any form of impact assessment appraises how proposed legislation will affect certain categories of stakeholders and sectors, for example, in the sense of the expected costs and benefits (Radaelli & Francesco, 2010).

In their review of the pertinent literature, Baumgartner and Jones (2009, p. 642) highlight the rampant expectation that policy appraisal brings in ‘evidence to counter interest-based policy-making, to integrate cross-cutting issues, and to increase cooperation between different departments.’ In other words, predicting and evaluating the potential effects of policy projects should generate a stimulus for the spillover effects of sectoral policies onto cognate sectors. Consequently, it is conceptually reasonable to establish a link between policy appraisal and coordinated approaches to policymaking (see also, e.g. Jordan & Russel, 2014). Coordination between different sectoral departments – also known as horizontal coordination (Peters, 2015) – is regarded as a necessary condition for the attainment of climate policy integration, which is closely related to the concept of sustainable development and environmental policy integration (Adelle & Russel, 2013; Jordan & Russel, 2014; Lafferty & Hovden, 2003). The Brundtland Commission paved the ground for both concepts with its famous report published in 1987, and influential jurisdictions such as the EU adopted them only a couple of years later (Jordan & Lenschow, 2010).

The basic idea of environmental policy integration is that environmental problems can only be resolved by policymaking if the sectors that cause these problems assume ownership of environmental objectives (Nilsson & Persson, 2017). In other words, environmental policy integration is not environmental policymaking, but it is rather about changing non-environmental policies in such a manner that they take into consideration their (negative) consequences for the environment (Jordan & Lenschow, 2010).

One of the most widely cited definitions of environmental policy integration requires policymakers to give ‘principled priority’ to environmental objectives over all other policy objectives (Lafferty & Hovden, 2003). However, it will not be possible in many instances – for political or practical reasons – to prioritize environmental concerns over other ones. Therefore, in order to remain able to practice environmental policy integration consistently, Nilsson and Persson (2017) and Persson et al. (2018) propose two other forms of environmental policy integration. The first of these refers to ‘coordination’ and

aims to avoid contradictory sectoral policies or to compensate for adverse environmental consequences of sectoral policies. The second form proposed by these authors is ‘harmonization’, which seeks to bring environmental objectives onto equal terms with sectoral objectives.

Climate policy integration resembles environmental policy integration, since its underlying logic is at least equally complex or ‘wicked’ (see, e.g. Head & Alford, 2015; Termeer, Dewulf, & Biesbroek, 2019). While climate concerns have been increasingly integrated into other sectoral policies such as, most importantly, energy policy (Boasson & Wettstad, 2016; Dupont, 2015; Sovacool, 2009), climate policy integration in the EU, unlike environmental policy integration, is not formally institutionalized. Instead, even in a jurisdiction like the EU that has explicitly committed itself to fighting climate change, climate policy integration occurs by means of actual policymaking (Adelle & Russel, 2013). And because a proper legal basis is lacking, academic observers have concluded that it is integrated to an ‘insufficient’ degree (Dupont & Oberthür, 2012).

This study seeks to advance the state of research on climate policy integration by concentrating on climate impact assessments as one particular instrument for attaining it. In doing so, it concentrates on the policy and political consequences of mandatory climate impact assessments in German cities and municipalities. Similar to regulatory impact assessments more generally, climate impact assessments are an administrative procedure and are used in the phase of pre-legislative scrutiny (Radaelli & Francesco, 2010). The sophistication and analytical rigor as well as the consequences of such climate impact assessments vary considerably across the individual local jurisdictions, as many different approaches exist (Parry & Carter, 2019).

Beginning in May 2019, cities and municipalities in Germany and other European states such as Austria, Italy, Luxembourg, Switzerland, and the United Kingdom passed resolutions in their local parliaments to declare a climate emergency (Climate Alliance, 2020c). A climate emergency manifests the cities’ and municipalities’ commitment to carrying out local climate actions compatible with recommendations of the International Panel on Climate Change for keeping global warming under 1.5°C.

There has been some controversy among cities and communities, even among those that passed a corresponding resolution, as to whether ‘climate emergency’ is a good term to use. The German city of Osnabrück, for example, ‘declared a climate emergency, without using the term itself’ (Climate Alliance, 2020b). What the local council committed itself to is to step up local climate policy and to consider the climate impacts of future policy decisions. Therefore, it is important to bear in mind that the ‘climate emergency’ status was rejected by some cities and municipalities which nonetheless committed themselves to mandatory climate impact assessments, which is the policy instrument of interest to this study.

## Theoretical argument

From a theoretical perspective, we can rely on the literature on policy appraisal that has already engaged to some extent with the questions that guide this research. In this regard, the research agenda article by Turnpenny et al. (2009) is particularly useful for our analytical purposes. Therein, the authors identify different approaches to the study of policy appraisal; one of these refers to treating the adoption of policy appraisal as the

independent variable and examining the effects of this policy decision on politics (the process by which policies are made) and policy design. This perspective turns on the assumption that the aim of policy appraisal is to stimulate interaction between different departments (Turnpenny et al., 2009, pp. 647–648). Increased interactions between departments may bring about policy change, which is motivated by actor-centered institutionalism as put forth by scholars such as Scharpf (1997). While actors matter for policymaking, according to actor-centered institutionalism their behavior is guided by the institutional structures in which they are based. Each institution is based on a specific ‘logic’, which creates rules and routines that then influence how decisions are made. While such institutional rules and routines can change over time, the changes are of an incremental nature (Russel et al., 2018). We assume that the adoption of mandatory policy appraisals represents a stimulus that can potentially generate institutional changes of a greater degree. More precisely, we anticipate the adoption of mandatory climate impact assessments – as one specific form of policy appraisal – to result in increased interdepartmental coordination and cooperation (**Expectation 1**).

While interdepartmental coordination and cooperation may potentially result in a better mainstreaming of climate concerns in other sectoral policies, some authors warn against not taking into account the coordination costs and the administrative capacity necessary for putting this into practice (Russel & Jordan, 2009, p. 1204). There exists a vast number of definitions of administrative capacity. In the specific context of policy appraisal, the definition offered by Jordan and Schout (2006, p. 7) has been widely cited; it emphasizes which resources are necessary for the exchange of information among participants in a governance process, as well as the identification of issues that require coordination solutions and the existence of an arbitrating mechanism for settling conflicts. A narrower definition of administrative capacity refers to financial, human and time resources (Turnpenny, Russel, & Jordan, 2014, p. 250), which we adopt for the purpose of this study. Following the pertinent literature (Jordan & Schout, 2006; Russel & Jordan, 2009; Schout et al., 2010; Turnpenny et al., 2009, 2014), we contend that climate impact assessments entail the need to increase the administrative capacities of the administrative units responsible for carrying them out (**Expectation 2**).

Considering that policy appraisals are administrative procedures (Radaelli & De Francesco, 2010), it is reasonable that they bring about changes to the administrative actors within local governments. However, research on policy appraisals has emphasized that such instruments also have a political dimension and that analysts should investigate their impact on both administrative and political actors as well as on their relationship (Schout et al., 2010, p. 165). When treating the adoption of mandatory climate impact assessments as the independent variable for explaining changes in politics, it is important to include the perspective of political actors, too. In this regard, we regard climate impact assessments as a factor that can potentially change the composition of the political agenda in parliaments. In other words, by making climate impact assessments mandatory, climate change should become a permanent item on the political agenda, regardless of the composition of the broader political agenda (see Baumgartner & Jones, 2009). Consequently, we expect attention to climate concerns to increase sharply in response to the adoption of mandatory climate impact assessments (**Expectation 3**).

While increased attention to climate issues is a straightforward expectation and one that should become observable shortly after the adoption of mandatory climate impact

assessments, there is another mechanism that is equally plausible from a theoretical viewpoint, but arguably difficult to observe within short timeframes. As Baumgartner and Jones (2009, p. 645), for example, compellingly argue, policy appraisals can result in learning processes. Polverari, Taylor, and Bachtler (2001) specify that in the case of ex ante policy appraisal, as is the case with climate impact assessments, we can expect single-loop learning to affect policy design. These changes in the design of the policies proposed by policymakers might in turn lead to the policies themselves becoming gradually more 'integrative' (**Expectation 4**).

Concerning the relationship between administrative and political actors, we expect the adoption of mandatory policy appraisals to increase the influence of administrative actors or political ones (**Expectation 5**). Climate impact assessments are carried out by administrators and, depending on the outcome, the competent administrative unit may not give clearance to the project or policy proposal. In other words, policy appraisals can potentially turn administrative actors into veto players and in this way give them power over political actors (Tsebelis, 2002).

## Methodological approach

To answer the research questions that guide this study, we rely on interviews carried out with 13 representatives of six cities and municipalities based in the states of Baden-Württemberg, Brandenburg and Rhineland-Palatinate. For the sake of data protection, the names of the cities and municipalities are not reported. Interviews are an apt instrument for collecting the data necessary for attaining our analytical goals since climate impact assessments were only made mandatory about one year ago, depending on the respective city. Consequently, we cannot draw upon 'hard' empirical information such as budget data. The interviews enable us to capture the perceptions and expectations of administrative and political actors regarding the changes that already took place or are imminent. Therefore, we use statements by individuals to draw conclusions for changes at the organizational level.

To ensure that we have variation vis-à-vis the focal explanatory variable, namely the introduction of mandatory climate impact assessments, we included cities and municipalities with and without a climate emergency status. As explained above, the climate emergency status effectively entails the decision to make climate impact assessments mandatory. It is important to include the views of representatives of non-emergency cities regarding the changes they have experienced in interdepartmental coordination and cooperation with respect to climate change matters. These cities may well have policy appraisal instruments in place that take into account climate issues, such as instruments for assessing the impact of legislative projects on sustainable development and environmental protection. Put differently, it is possible that cities and municipalities have reacted to previous stimuli to adopt impact assessments, which also encompass climate action.

Table 1 gives an overview of the cities and municipalities in which our interview partners are based and indicates whether they are represented in the local councils (i.e. the political actors) or in the local government (i.e. the administrative actors). By selecting interviewees from a higher hierarchy level (i.e. heads of departments or offices), we ensured a good overview over (administrative) processes and changes.

**Table 1.** List of interviewees.

ID	City/municipality	Organization type	Emergency	Interview date
IP1	City 1 in Baden-Württemberg	Administration	Yes	27 March 2020
IP2	City 2 in Rhineland-Palatinate	Administration	Yes	8 April 2020
IP3	City 2 in Rhineland-Palatinate	Council	Yes	16 April 2020
IP4	City 6 in Brandenburg	Council	Yes	26 March 2020
IP5	City 6 in Brandenburg	Administration	Yes	18 March 2020
IP6	City 5 in Brandenburg	Administration	No	12 March 2020
IP7	City 5 in Brandenburg	Administration	No	19 March 2020
IP8	City 5 in Brandenburg	Council	No	26 March 2020
IP9	City 4 in Brandenburg	Administration	Yes	19 March 2020
IP10	City 4 in Brandenburg	Council	Yes	25 May 2020
IP11	City 3 in Baden-Württemberg	Administration	No*	25 March 2020
IP12	City 3 in Baden-Württemberg	Council	No*	21 April 2020
IP13	City 1 in Baden-Württemberg	Council	Yes	26 May 2020

Remarks: \*This city adopted a plan similar to those of cities that declared a climate emergency, but in the corresponding resolution it does not refer to a mandatory climate impact assessment.

The interviews were carried out between March and May 2020. Some of the interviews were done face-to-face, whereas others had to be carried out via phone or online conferencing tools due to the outbreak of the COVID-19 pandemic and the lockdown that took effect after mid-March 2020. The interview duration spanned from 16 to 44 minutes (one interviewee replied in writing). After an interview training, two interviewers carried out the interviews by using a structured interview guideline, which was pre-tested by a different interviewer with a representative of a different city.

The interview guidelines varied along two dimensions: First, we asked different questions to representatives of cities with and without an emergency status; second, we asked different questions to representatives of local councils and of local governments. The guidelines for the cities with an emergency status included questions about that status, then proceeded with questions related to everyday policy work, organizational changes, coordination with internal and external actors, and ended with an invitation to the interviewees to ‘evaluate’ the climate emergency declaration as well as the institutional and policy changes it brought about. The interviewees based in cities without an emergency status were asked whether they knew the reasons for not declaring it. The subsequent questions tapped into changes in everyday policy work, organization, and coordination with internal and external actors. At the end, these interviewees were also invited to ‘evaluate’ the situation in their respective cities and municipalities.

We used two types of questions to gain insights that would facilitate a plausibility probe of our theoretical expectations. First, explicit questions about changes in everyday work revealed implicit information on general changes in attention to climate concerns, changes in workload and horizontal coordination as well as shifts concerning the relationship between local councils and local governments. Second, we used broader questions to trigger a reflection on the previous information as well as an evaluation of the climate action measures in place. As is the case with interviews more generally, we ended up with rich empirical material, and in order to link it to the theoretical constructs of interest we used the software MAXQDA to carry out a qualitative content analysis by applying a content structuring approach (Mayring, 2015).



To further support the information gathered during the interviews and to back up our interpretation of the interviewees' statements, we also consulted evaluation reports on the German cities of Constance (Climate Alliance, 2020a) and Osnabrück (Climate Alliance, 2020b).

While we acknowledge that our empirical basis does not allow for a hard test of the expectations put forth in the previous section, it does facilitate a preliminary and indicative assessment of whether these align with the empirical reality and are worth further investigation. Given the rigorous structure of the guideline used for the interviews, answering our research questions was a straightforward task, which leads us to consider it a strong enough base for a plausibility test.

## **Presentation and discussion of the empirical findings**

In this section, we present the insights we could gain based on the interviews conducted. The presentation of the empirical findings follows the three research questions.

### ***The perspective of local governments***

The interviewees confirmed that the main consequence of declaring the climate emergency consists in the obligation to carry out climate impact assessments. In one city, the approach to impact assessments is broader and does not only include climate concerns but the Sustainable Development Goals as adopted in 2015 (IP2). Furthermore, the interviews show that climate change enjoys greater priority in policymaking at the local level because of the emergency status, manifesting through impact assessments, explicit forward planning or an increase in sensitization to climate-related issues among the staff (e.g. IP1, IP7).

When asked about institutional or structural changes brought about by the mandatory climate impact assessments, the interviewees indicated that no such changes have taken place yet (e.g. IP4). In fact, most interviewees stated that the cross-departmental coordination and cooperation did not change with the declaration of the emergency status, because even before that there was regular exchange between the different administrative units (e.g. IP5). What seems to have changed is the launch of specific cross-departmental project teams. Several interviewees indicated that they expect the coordination and collaboration between different administrative units to intensify in the future (e.g. IP9).

As stated in the theory section, this study – similar to many others – rests on the assumption that effective climate action requires cross-sectoral coordination and cooperation. Interestingly, the interviewees alluded to problems arising from such institutional arrangements. Several local government representatives mentioned that cross-sectoral coordination and cooperation hampers the efficient handling of tasks because the different departments have different understandings of and expertise in a given topic. They also highlighted that integrative governance blurs authority and competence, and results in situations in which the departments with less expertise or experience in a matter make 'blatant' demands which the department with more expertise or experience then has to 'ditch', creating frictions and tensions within local government (e.g. IP9). Another potential source of tensions is that individual departments begin to consider themselves as having a more legitimate approach to climate topics than other

departments (e.g. IP5). A frequently expressed view was that integrative governance comes with additional costs and efforts, especially in the case of climate action:

*‘Well, it is true that climate action is a cross-cutting issue. That means that if you take it seriously, it is an issue everywhere, in almost all activities in the municipality. Whether you are in the building, the energy sector or the mobility sector. And it is indeed the case that climate action must always be taken into account in all these activities. In this respect it entails more effort already’ (IP4).<sup>1</sup>*

One interviewee indicated that with the obligation to carry out climate impact assessments the workload increased to such a degree that now this person cannot take care of other tasks and responsibilities such as public relations work. Instead, all resources are now invested in appraising the climate impact of legislative proposals (IP5). This view is supplemented by another interviewee, who noted that this extra effort cannot be sustained in the long run in light of current capacities (IP7).

While several interviewees indicated an increase in their workload due to the mandatory climate impact assessments, one representative of a city questioned whether the resources invested in conducting these assessments are sufficient at all. This interviewee contended that the way in which climate impact assessments are being carried out corresponds to a low-resource scenario and therefore they are not very rigorous. According to this interviewee, significantly more resources would be needed to facilitate a more comprehensive approach to appraising the climate impact of the various legislative projects:

*‘I believe that if we took the topic seriously and said that these statements must be valid and we actually want to use them as a springboard for the next level of development [. . .], it would have to take 30% of the manpower in every department I supervise. It’s not seriously viable below that’ (IP9).*

Interestingly, while many interviewees mentioned an increase in their workload, one city representative indicated that the administration would gain ten more employees because of the declaration of the climate emergency (IP5). Several interviewees stated that they expect or are aware of an increase in positions on climate issues. The positions mentioned comprise both dedicated climate action managers and general staff in order to support the work of those staff members who work on climate-related issues. In one case, the declaration of the climate emergency evidently prevented the downsizing of the administrative staff who specialize in climate issues (IP3). However, given the economic and financial consequences of the COVID-19 pandemic, several interviewees expressed concerns that the announced positions may not materialize due to the need to make drastic cuts in the budgets of the cities and municipalities (e.g. IP13).

However, the interviews also revealed that if new jobs in administration are created, these would come with a new profile. When hiring new staff, the eligible candidates should have a solid knowledge in governing challenges related to climate change, but at the same time also understand the logic by which other sectoral departments operate (e.g. IP7, IP12). Conversely, some interviewees stated that strong competencies in climate-related topics are becoming more important for future staff regardless of the department in which they will be working (IP9).

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<sup>1</sup>All interview quotes were translated from German by the authors.

The interviews conducted revealed differences between emergency and non-emergency cities and municipalities to the degree that there has been some strategic restructuring of administrative units in order to deliver on the increased need for climate-related expertise. For example, in one case, the department in charge of managing the environment and forests was transformed into a department on ‘climate action, environment and forests’ (IP3). This re-organization of the department is interesting in at least two ways. First, by inserting ‘climate action’ in the department’s name, the local government underlines the political priority of climate change. Second, we can expect climate action to feature more prominently in decisions and projects that would originally have focused on environmental protection or forests only. However, it should be noted that non-emergency cities have also taken steps to mainstream climate action into sectoral policies. To this end, city 5 in Brandenburg, for example, appointed a climate action manager, who is supposed to introduce the topic into the various sectoral departments, set up cross-sectoral project teams and act as a competent contact person (IP7). This indicates that non-emergency cities also recognize the need for cross-sectoral coordination and cooperation, though their responses are incremental compared to those of the emergency cities.

### ***The perspective of local councils***

All interview partners representing local councils stressed that climate change has received more attention since the declaration of the climate emergency. The interviewees alluded to council debates and explained that these now focus more on questions related to the climate impacts of legislative proposals or planning projects. The interviewees in the emergency cities also reported that they could observe broad support across political parties represented in the local councils to take climate action. The increased political attention to climate change and the cross-party support for climate action is a positive development. However, one interviewee adopted a more critical stance and indicated that ‘climate impact’ has become a buzzword in the council meetings and that it does not mean much in substantive terms:

*‘Apart from the fact that every now and then, in addition, although one knows that it doesn’t help at all in this matter, here and there the word climate is mentioned at the end of a draft . . .’* (IP12).

While we can confirm that the mandatory climate impact assessments have placed climate issues on the agenda of local councils, not a single interviewee stated that the process of decision-making has changed in response to the adoption of this instrument. Likewise, the interviews do not indicate that local politicians think differently regarding legislative projects because of the mandatory climate impact assessments (see in particular IP3). This means that the policies proposed have not become more ‘integrative’ of climate concerns. This finding is supported by the assessment of the Climate Action Coordinator of the City of Constance, who stated that ‘climate action must be thought of on a cross-project basis and measures should be planned and implemented beyond administrative units’ (Climate Alliance, 2020a).

Overall, the empirical findings show that climate concerns have penetrated the political agenda of local councils and politicians refer to them when debating legislative

proposals. The politics of climate action have not become more contested; instead, the interviewees stated that there is consensus among the political parties represented in local councils that climate action is necessary. So far, there are no signs that sectoral policy proposals pay more attention to climate concerns when climate impact assessments are mandatory.

### ***The relationship between local governments and local councils***

In cities in which climate impact assessments are obligatory, politicians who want to introduce a policy proposal in the local council must first submit these projects to the local government for an ex ante appraisal of their impacts on climate change (IP2). If the expected climate impacts are (too) negative, the local government can refuse to sign off the proposals, which gives the bureaucrats room for strategic maneuvering. First, they can place climate-related issues on the political agenda, since the mayor is head of the local government and a member of the local council at the same time. By interacting with the mayor, or in larger cities with the various mayors, administrative units responsible for climate governance can induce climate issues to be included in the agenda of the local councils. Second, the administrative units can liaise with the parties that strive to make a policy proposal and induce them to pay more attention to climate concerns. Third, they can act as a veto player and delay or hinder certain projects. Since council work is sometimes undertaken voluntarily (especially in smaller municipalities) and the time and capacities of council members are therefore restricted, one interviewee highlighted the dependency on a pro-active administration and its proposals (IP8).

The interviews revealed that these powers of the local government are particularly marked in the emergency cities, though they are not absent in the non-emergency cities either. At any rate, it became apparent in the interviews that the local governments have become more influential in the policymaking process, and one representative of local government indicated that the political actors even expect administrative actors to play a more proactive role:

*‘... it is probably the case in politics in general that the two heads of the technical committees of our city council will not necessarily set the goals that the administration should strive for, which could be climate action, but that there is then a certain expectation that the city [administration] will formulate goals in advance and present them for decision’ (IP7).*

### **Plausibility of the theoretical expectations: a preliminary assessment**

In the theory section, we formulated five expectations which we derived from the literature on policy appraisal. Having presented the insights provided by the interviewees, we can now assess the plausibility of each expectation.

The interviews provided little support that interdepartmental coordination and cooperation have been affected by the mandatory climate impact assessments. The representatives of local governments stated that they had been working with other departments even before it became obligatory to carry out ex ante policy appraisals. The interviewees based in cities and municipalities with an emergency status were more eager to stress the interdepartmental coordination and cooperation than those

based in cities without this status. Nevertheless, even in the latter the interviewees explained that horizontal coordination takes place. Consequently, there is no support for the first expectation.

We could see a marked difference between the responses of interviewees based in emergency and non-emergency cities. In emergency cities, the interviewees almost unilaterally expressed their concerns that the obligation to carry out climate impact assessments for every policy project would increase their workload and may reduce their capacity to fulfil other tasks. Interestingly, the interviewees also stated that they expect additional investment in the administrative capacity. For example, one interviewee explained that the new policy prevented cuts in personnel, whereas another said that new positions would be created. Overall, despite the prospects of strengthening the administrative capacity, the bureaucrats in local governments stressed the higher future workload, which supports our theoretical reasoning. The representatives of non-emergency cities did not express such concerns.

Turning to the interviews with members of local councils, we could learn that climate change has reached the political agenda and that it is now discussed as a 'standard item' in the councils of the emergency cities. However, the increase in agenda attention to climate issues has not resulted in a modified design of the sectoral policies proposed. So far, we have not been able to observe that sectoral policies have become more 'integrative' of climate considerations. The lack of support for this expectation is not surprising, since policy processes within organizations take time. Considering that the new policy has been in place for a very short period, this finding aligns with what other studies have already reported (see, e.g. Turnpenny et al., 2009).

Turning to the last expectation, we were able to observe that administrative actors have become more influential in the policymaking process. However, the responses of some interviewees suggested that this is also expected of them, since they have to appraise every policy project. Even though this expectation was motivated by veto player theory (Tsebelis, 2002), the political actors interviewed did not say that they regard the administrative actors as veto players. Thus, while formally local governments can act as veto players, they have not yet made use of this power at the early stage of policy implementation.

Table 2 summarizes the theoretically derived expectations and empirical findings obtained from the interview material. Altogether, the model appears theoretically plausible, which is partly due to the fact that we developed it in line with the pertinent literature and the theoretical arguments advanced therein. The reasoning regarding the potential veto power of bureaucratic actors represents an addition to the literature. Even if we have failed to obtain unambiguous findings for this research dimension, we nonetheless advocate it as a promising perspective for future research. Similar to the measurement of learning, we suspect that it will only be possible to determine whether or not bureaucrats act as veto players once the obligation for climate impact assessments has been in place for a longer period.

**Table 2.** Summary of the key findings.

No	Actor group	Expectation	Findings
1	Local government	Adoption of mandatory climate impact assessments results in increased interdepartmental coordination and cooperation	This expectation could not be supported, since interdepartmental coordination and cooperation had been in place before the new policy
2	Local government	Adoption of mandatory climate impact assessments results in the need to increase the capacity of the administrative units	This expectation could be supported, but the interviewees also stressed plans to increase the administrative capacity by hiring new staff
3	Local council	Adoption of mandatory climate impact assessments results in increased political attention	This expectation could be supported – climate issues are now part of the political agenda ‘by default’
4	Local council	Adoption of mandatory climate impact assessments results in a more ‘integrative’ policy design	This expectation could not be supported, which may result from the new policy having only been in place for a short period
5	(Interaction between) local government and council	Adoption of mandatory climate impact assessments increases the influence of administrative actors over political ones	There is some support for this expectation, but the interviewees also suggested that political actors do not consider this problematic

## Conclusion

Climate change represents a challenge to all levels of government. In this study, we concentrated on local-level policymakers, elected politicians and bureaucrats, and how they respond to climate change. In particular, and in line with the research interest of this Special Issue, we paid attention to the integration of climate concerns into sectoral policies. The literature on climate policy integration has predominantly focused on the corresponding strategies adopted by international organizations (Hermwille, Obergassel, Ott, & Beuermann, 2017), the European Union (Dupont & Oberthür, 2012), and national governments (Niedertscheider, Haas, & Görg, 2018). Relatively little attention has been paid to the local level, even though research on other policy issues has shown that this level of analysis can be particularly helpful, especially since it enables scholars to examine the role and importance of different actor groups, such as most important local politicians and local administrations (Bussi & Graziano, 2019; see, e.g. Zimmermann, Aurich, Graziano, & Fuertes, 2014).

Being a classic transboundary policy problem, this investigation is based on the assumption that climate change can only be tackled effectively if it is integrated into other sectoral policies (Adelle & Russel, 2013). However, we did not focus on climate policies but on the potential impact of sectoral policies on climate change. To this end, we investigated the changes in institutions and policies brought about by mandatory climate impact assessments, which represent a specific type of *ex ante* policy appraisal. In cities that have declared a climate emergency, all policy proposals and planning projects must undergo an assessment regarding their impact on climate change before they can be considered.

Our analysis revealed that the declaration of a climate emergency can indeed be regarded as a window of opportunity for mainstreaming climate concerns into sectoral policies. Remarkably, the interviewees were less aware of the organizational changes that had already taken place or were being implemented in order to restructure local administrations or shape the relationship between local administrations and local parliaments.

The adoption of mandatory climate impact assessments has increased the importance of administrative actors for policymaking at the local level: In principle, they can now block decisions or ask for modifications in projects and proposals. Further, they can push ahead and place climate-relevant projects on the decision agenda as well as cooperate with politicians and induce them to adopt a more climate-friendly approach to their policy projects. The representatives of local governments contended that they had already been working in cooperation with other administrative units. However, now that their governments have declared a climate emergency, they all expect the need for cross-departmental coordination and cooperation to increase, and along with it a higher workload.

The interviews also revealed that while the process of policymaking has changed, the design of the policies adopted has not – or at least not within such a short period following the declaration of a climate emergency. The policy measures adopted are not more integrative with regard to climate issues. However, we must bear in mind that this assessment could change in the years to come as the emergency status is maintained and new staff is hired that is more sensitive to the need for integrating climate change into other policy sectors.

Another issue related to the time dimension concerns the COVID-19 pandemic, which many interviewees referred to as they expressed concerns that it might distract from other issues which cities and municipalities must cope with, such as climate change. Therefore, the early point in time for carrying out this assessment is a limitation of our study. Another limitation is that we could draw from interview material for six German cities only. Therefore, we invite future research to expand the database and to check whether our conclusions and expectations still hold true.

Altogether, the declaration of the climate emergency status seems to have generated a reflection process in local parliaments and administrations which considers all policy sectors to have implications for mitigating climate change. Although no interviewee indicated that the idea underlying the policy measures has changed to reflect the transboundary nature of climate change, we expect corresponding learning processes to take place in the future. And if cities and municipalities start to change their conceptions of climate policy measures, this new way of thinking could diffuse upward to the next, higher levels of political systems, making the research perspective put forth here attractive for studies on polycentric climate governance (Ostrom, 2010; Sovacool & Brown, 2009). Therefore, there is good reason to pay more attention to the approaches of local-level actors to climate governance.

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## Disclosure statement

The authors declare no conflict of interests.

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