

Mind the Gap: Common Pitfalls in Environmental Policy Implementation in Low- and Middle-Income Countries

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Key Messages

- Globally, there has been a surge in environmental policies to address multiple pressing issues, from water management to climate change mitigation. Nonetheless, policies do not always achieve their intended objectives, creating so-called ‘policy implementation gaps’.
- Policy implementation gaps are a global governance challenge. However, they remain under-researched in the context of environmental policies in Low- and Middle-Income Countries (LMICs).
- This Policy Brief reports on findings from a recently published literature review [1] that synthesised existing studies focusing on environmental policy implementation gaps in LMICs. The review identified factors that commonly contribute to implementation gaps, which provides a starting point to support more effective policy processes.
- The five factors identified in the review were: policy content; institutional structures and interactions; resource availability; engagement of non-governmental actors; and political interests and dynamics.



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Water pollution in Kathmandu, Nepal

- The review outlines a set of key recommendations for policymakers, practitioners, and other actors involved in LMIC policy processes. Importantly, it points to the need for increased focus on policy implementation, moving beyond policy design and formation.

Overview and Background

Environmental policies – including visions, strategies, and legislations – are essential to facilitate the global shift towards more resilient, low-carbon, and sustainable economies. At the national level, policy development is essential to support countries to meet their domestic

objectives, as well as international commitments such as the Sustainable Development Goals and the Paris Agreement. Therefore, influencing policy formation and information are often key goals for politicians, non-governmental organisations (NGOs), donors, and other practitioners.

Nonetheless, there are concerns about the efficacy of the policy process given policies often fall short in achieving their objectives, resulting in the emergence of so-called *policy implementation gaps* [2–4].

Policy implementation gaps are universal governance challenges: implementation gaps have been studied in both High-Income Country (HIC) and Low- and Middle- Income Country (LMIC) contexts, exploring various policy areas – from the economy [3] to public health [5]. Nonetheless, there has been limited critical examination of environmental policy implementation experiences in LMICs, despite numerous studies and reports noting

the persisting challenge of implementation gaps [6–8].

This Brief reports on and summarises the findings of a recently published literature review in *Environmental Policy and Governance* [1]. The review sought to systematically synthesise and thematically assess empirical cases of national environmental policy implementation gaps in LMICs. Identifying factors that commonly hinder successful implementation provides an entry point for policy learning and, ultimately, supporting improved policy processes. Based on the review’s findings, this Brief outlines a set of recommendations relevant for policymakers, academics, and other practitioners.

Aims and Methodology

The Brief reports on a semi-systematic literature review. This literature review used keyword searches, focused on identifying relevant academic literature. Therefore, grey literature and non-peer reviewed sources were excluded from the reported study.

Keyword searches on the academic databases, Web of Science, and Scopus, initially returned

over 3000 articles. After a structured reduction process, as well as additional backward and forward searches, the final sample had 67 articles. A thematic analysis was used to identify common themes in the reviewed studies; these themes represent factors that impacted policy implementation effectiveness. The complete methodology can be found in the published article [1].

Key Findings: Factors Affecting Policy Implementation

This section provides a snapshot of key insights from the review. Five themes emerged as key factors that commonly contribute to implementation gaps in LMICs according to the existing empirical literature. These five factors were:

- Policy content;
- institutional structures and interactions;
- resource availability;
- engagement of non-governmental actors; and
- political interests and dynamics.

These themes are described in the following subsections and summarised in **Table 1**. It is important to highlight that these factors rarely occur in isolation; they are interrelated and interacting, and manifest differently across contexts.

A policy may have content gaps or other technical shortcomings

The review revealed that policies may not be effectively and efficiently implemented

because of gaps, ambiguity, and incongruent detail in the policy's content. For example, policies may be missing key information; contain unclear information; lack relevance to the local context; or be poorly aligned with the wider policy framework. As such, ambiguous policy content may cause wide-policy interpretations, preventing full and effective implementation.

Ineffective institutional structures and interactions

The review suggested that sometimes the overall institutional structure may not be conducive to supporting effective policy implementation. Both highly centralised and decentralised institutional structures can cause challenges. For example, centrally developed policies may lack local relevance, or overly complex institutional structures may impede policy translation. Commonly, issues such as excessively bureaucratic and slow processes were found to delay policy implementation. Furthermore, institutional structures may not be conducive to coordination, communication, and collaboration between ministries or government departments leading to duplication of efforts or siloed approaches within the policy process.

Government entities may lack the Resources

The review indicated that policy implementation was often hindered due to inadequate resources, particularly for implementers on the ground. Financial shortages were particularly acute, which compounded other resource challenges. For instance, implementers may have no budget for equipment, such as vehicles, to carry out implementation activities. Furthermore, the review also suggested that ministries or

departments tasked with implementation may be constrained by staff or skill shortages to carry out the required duties. Finally, poor data and information may stall key activities affecting the quality of evidence used to inform decision-making.

Limited involvement of key non-governmental actors in the policy process

Various actors were excluded or ineffectively involved across the policy cycle in the reviewed studies, which ultimately affected implementation outcomes. The public, NGOs, the private sector, and informal actors may be insufficiently involved in the design or translation of policies, resulting in implementation gaps emerging. Moreover, non-governmental actors may lack interest, resources, or awareness of the policies, meaning they do not carry out their responsibilities required for full implementation of the policy. For instance, studies found that informal institutions, including traditional leaders, may be excluded from the policy process, or involved in a tokenistic manner, yet their position and influence mean their buy-in is important.

Political interests and dynamics as barriers to implementation

The policy process is affected by complex actor dynamics, and the review suggested that low commitment, corruption and clientelism, and power issues were causes of implementation gaps. For example, some studies suggested that policymakers and on-the-ground implementers had low commitment to implementing environmental policies, because other policies – such as those related to economic development – may be prioritised.

Table 1: An overview of themes that emerged as common pitfalls affecting policy implementation in LMICs. Examples from some of the reviewed studies are provided for illustrative purposes. Please note that the themes were found to be interconnected and interacting.

Pitfall	Specific challenges identified	Examples from reviewed studies
Gaps or other shortcomings in the policy content	Policies are unclear	In China, environmental policies can be abstract, and use vague language [9].
	Policies omit key details	Cameroon's waste management policy did not define mandates for different institutions [10].
	Policies lack local relevance	India's e-waste policy principles, modelled on the European Union's, overlooked the informal sector, reducing their relevance in the local context [11].
	Policies lack harmonisation with wider framework	Nepal's water policy had contradictions with wider policy framework, contributing to legal and institutional conflicts [12].
Ineffective institutional arrangements and interactions	Ineffective institutional arrangements	High institutional complexity was found in Jordan, with 13 bodies involved in implementing climate and environmental policies [13].
	Ineffective institutional processes	There were delays in key processes during the implementation of Kenya's Feed-in-tariff policy [14].
	Ineffective inter-institutional coordination	Nepal's water policy was hindered by institutional overlaps and lack of coordination, both horizontally and vertically [12].
Insufficient resources for implementation	Financial resource allocations are unavailable or insufficient	Budgetary constraints impacted local level enforcement activities pertaining to Malawi's forest policies [15].
	Staffing or expertise shortages	In Vietnam, implementing authorities were understaffed, preventing enforcement of regulations [16].
	Shortages or limitations of infrastructure & equipment	In Peru, there was a lack of equipment and vehicles to monitor mining activities and implement environmental regulation [17].
	Limited data and information	In Himachal Pradesh, India, the climate adaptation policy was hindered by limited data availability for key activities such as modelling [18].
Non- governmental actors insufficiently involved in the policy process	Public not sufficiently involved or aware of policy	In Nepal, certain communities – including women and youth – were not heard during consultation for a water policy, thereby overlooking their needs [12].
	Traditional authorities' role overlooked	In Ghana, tensions emerged between government agencies' personnel and traditional leaders' during water policy implementation [19].
	NGOs & development partners' involvement is not always effective	In Indonesia, feedback on policy documents provided by NGOs was not incorporated into the final policy [20].
	Private sector involvement ineffective	Nepal's waste policy process had limited involvement of private sector despite their central involvement in waste collection processes [21].
Political interests and dynamics impact implementation outcomes	Governmental actors have low commitment to the policy	In Vietnam, economic imperatives were prioritised over environmental goals [16].
	Political corruption and clientelism are pervasive	In the Philippines, politicians had relationships with fossil fuel firms, preventing full implementation of renewable energy policies [22].
	Power conflicts exist between government actors and institutions	In South Africa, power conflicts between formal and informal institutions hindered implementation of the water policy [23].

Recommendations

Environmental policies must be fully implemented if they are to result in transformative change and support sustainability transitions. The review identified key factors contributing to implementation challenges in LMICs, based on existing empirical case studies. Based on the findings, the following recommendations are offered to help overcome common pitfalls in environmental policy implementation in LMICs:

- Policymakers, donors and other actors should prioritise the development of implementable, and relevant policies that embrace local contextual specificities. This means involving diverse actors in the policy process, including informal and traditional actors. This will support the design and development of policies that are locally relevant, improving the likelihood that they are implementable and impactful.
- There is a risk of increased complexity in the environmental policy landscape with more policies being developed, but a lack of resources available for full implementation.

Researchers and practitioners should seek to identify positive case studies of successful implementation in LMICs to identify resource efficient policies that can drive on-the-ground impact. These quick wins are important to achieve environmental goals in resource constrained environments.

- Donors and international organisations often influence the policy design phase in LMICs. This support should extend to implementation activities, as well as key supporting processes, such as monitoring and evaluation. Donors and international organisations should also be well-coordinated, to prevent duplication of activities or siloed efforts. Ultimately, donors should help to build capacity and integrate sound governance principles into the entire policy cycle, rather than focusing only on influencing the policy's design and content.
- Policymakers can seek to improve monitoring and evaluation activities. This part of the policy process is important as it can help identify inefficiencies, improve data and information, and support overall policy learning.

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