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# How policy growth affects policy implementation: bureaucratic overload and policy triage

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## ABSTRACT


While policies pile up in modern democracies, the effect of policy growth on policy implementation has not been addressed so far. Implementation research has focused on individual policies instead of studying the challenges implementation organizations face in dealing with growing policy stocks. In this paper, we address this research gap in three ways. First, we introduce the novel concept of organizational ‘policy triage’ which captures implementation effectiveness from an organizational rather than a policy-based perspective. Second, we develop a theoretical framework to account for variations in the prevalence of policy triage across organizations. We argue that policy triage is affected by the interplay of several factors related to (1) organizational overload vulnerability and (2) organizational overload compensation. Third, we provide an initial empirical test of our conceptual and theoretical considerations through four comparative case studies on environmental policy implementation in Ireland and England.

**KEYWORDS** Policy growth; organizational overload; implementation

## Introduction

Policies pile up in modern democracies. Policy stocks are growing over time, both across countries and sectors.<sup>1</sup> This phenomenon of policy growth has been described from different analytical angles, including the concepts of ‘policy accumulation’ (Adam et al., 2019), ‘rule growth’ (Jakobsen & Mortensen, 2015), or ‘policy layering’ (Daugbjerg & Swinbank, 2016). Although these concepts display important differences in their analytical focus, they all observe that governments effectively adopt more rules and policies over time than they abolish.

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Yet it is evident that more policies imply more implementation work. If policies are adopted without the parallel expansion of implementation capacities, policy growth might directly translate into growing implementation problems and undermine overall policy performance (Limberg et al., 2022). Strikingly, the link between policy growth and policy implementation has not been addressed so far. Implementation research has focused on individual policies instead of studying the challenges and trade-offs that organizations face when handling *growing policy stocks*. In particular, the role of organizational overload as a source of implementation problems has been neglected in the literature.

In this paper we propose an innovative approach to address this research gap. First, rather than concentrating on the implementation of individual policies, we pursue an *organizational perspective* capturing the extent and proliferation of implementation problems for the *aggregate of the policies within an organization's policy portfolio*. In this regard, we conceive of implementation deficits as '*policy triage*', i.e., the extent to which organizations develop behavioral routines for making trade-offs in allocating their limited resources while carrying out their work. While policy triage comes in different forms in practice, we assume that any trade-off decision entails that specific implementation tasks are neglected or delayed in favor of other duties. Second, we suggest a novel theoretical argument that accounts for the variation in the prevalence of policy triage across organizations. More specifically, we claim that the latter is affected by two factors, namely (1) the *overload vulnerability* of the organizations in charge of implementation and (2) the *organizational overload compensation* determined by the extent to which implementation bodies are internally committed to optimizing implementation effectiveness via administrative reforms to buffer or reduce overload. Third, we provide a first empirical test of our conceptual and theoretical considerations by examining four comparative cases of environmental policy implementation in Ireland and England.

The remainder of this paper is structured as follows. In *section 2*, we briefly report the state of the art and identify prevailing research gaps in implementation research. In *section 3*, we introduce our concept of policy triage. Our theoretical argument to account for variation in policy triage is developed in *section 4*. In *section 5*, we present our research design before presenting our empirical findings in *Section 6*. *Section 7* concludes and outlines avenues for future research.

## State-of-the-Art: blind spots in implementation research

Scholars of Public Policy and Public Administration have neglected the phenomenon of policy growth and its potential consequences on policy implementation. This can be traced to two reasons. First, implementation research typically departs from a *policy perspective* concentrating on the

study of the implementation of individual policies rather than an *organizational perspective* that studies the implementation bodies' performance in dealing with the overall stock of policies they are in charge of. Second, research so far has not systematically addressed the implementation challenges emerging from bureaucratic overload.

### ***The policy bias of implementation studies***

The central focus of implementation research is on the process of transforming political programs into concrete actions of administrative agencies in charge of executing, monitoring, controlling, and enforcing public policies (Knill & Tosun, 2020). Pioneered by Pressman and Wildavsky (1973), implementation research demonstrated already in the 1970s that significant deviations and shifts in objectives can occur during the execution phase. While it has become conventional wisdom that the proper implementation of a policy is anything but trivial, research has identified several potential determinants (Winter, 2012), including the choice and design of policy instruments (Fernández-i-Marín et al., 2021; Howlett & Ramesh, 2016; Jordan & Moore, 2022); the channels through which central policy-makers control the implementation process (Jensen, 2007); the institutional design of implementation structures (Lundin, 2007; Steinebach, 2019); as well as administrative capacities (Börzel, 2000; Limberg et al., 2022).

Although these studies have advanced our understanding of individual implementation processes, we need a holistic perspective on the prevalence of implementation deficits at the organizational level of implementation bodies that systematically takes account of interdependencies *across* different policies in organizational policy stocks. Given organizations' constrained administrative capacities, effective implementation of a newly adopted policy 'A' might come with the poor implementation of already existing policies 'B' or 'C', as implementers shift their priorities, thereby decreasing the overall organizational implementation performance. Regardless of whether implementation is analysed top-down or bottom-up (Hupe & Hill, 2007), the focus on potential deficits remains *policy- rather than organization-oriented*. This implies that trade-offs between implementing different policies have remained outside the analytical radar of existing research.

It is important to highlight that we do not argue that there is not yet an organizational perspective on policy implementation. For instance, the study of implementation structures is of long-standing concern in implementation research. Yet the major debate in this strand has centered on the question of whether public policies are typically implemented through a 'single lonely organization' (Peters, 2014, p. 132) or if it needs a 'multiorganizational analytic perspective' (Hjern & Porter, 1981, p. 201) to understand the implementation process (see also Hall & O'Toole, 2000). In other words: the

existing organizational perspective on implementation has tried to describe and map the organizations involved in policy implementation and to identify changes in 'the population of organizations' over time. It has not looked at – and that is the focus of this article – how individual organizations deal with the issue of overload and the challenge to implement multiple policies at the same time.

### ***The neglect of organizational overload***

Implementation studies have largely neglected the problem of bureaucratic overload as a source of poor implementation. Yet, the general neglect of bureaucratic overload does not mean that implementation studies completely ignored the role of administrative capacities as a factor affecting implementation effectiveness.

However, the analysis of administrative capacities suffers from several shortcomings. First, administrative capacities are typically discussed as a static factor; i.e., changes in the sufficiency of capacities given growing implementation burdens are not explicitly considered. Second, administrative capacities are analysed at the macro-level for entire countries or policy sectors without acknowledging potential capacity variation across implementation bodies (Börzel, 2021; Fernández-i-Marín et al., 2021; Limberg et al., 2022). Third, administrative capacities are merely discussed as a feature of the organizational design of implementation structures. The question here is on the most appropriate arrangements to ensure effective implementation rather than on problems of bureaucratic overload. In addition to debates whether policies are typically implemented through a 'single lonely organization' (Peters, 2014, p. 132) or whether making a program work effectively requires the cooperation and coordination of multiple organizations (Michel et al., 2022; Sætren & Hupe, 2018), the literature on collaborative governance analysed the involvement of various actors from both the public and the private sector in policy implementation (Sager & Gofen, 2022; Thomann et al., 2018). The central insight from this latter strand of research is ambiguous: Collaborative governance might facilitate policy implementation but also comes with severe challenges in terms of governmental implementation capacities (Bertelli et al., 2019).

While implementation research has remained rather blind to bureaucratic overload, the latter constitutes the central assumption of research on street-level bureaucrats, who are studied as crucial players influencing policy outcomes through their role as implementers of public policy (Cohen, 2021; Hupe, 2019). As Lipsky (2010) points out, street-level work is typically restricted by the scarcity of resources. Bureaucrats resort to coping practices to deal with overload, implying a divergence from initial policy objectives (Tummers et al., 2015). Coping strategies thus constitute a major source of

implementation deficits and emerge as an unavoidable consequence of chronic overload (Gofen, 2014; Sager et al., 2014). Yet by simply assuming that street-level bureaucrats *are* overloaded, research does not take account of variation in overload levels and also does not assess the impact of changes in overload levels over time. Moreover, given the exclusive perspective on street-level bureaucrats, an actor-centered perspective prevails that provides little analytical leverage for assessing the implementation behavior at the meso-level of organizations.

Altogether, implementation research has not developed analytical sensors to capture the consequences of policy growth on policy implementation. The focus has been on studying individual policies rather than individual organizations. Consequently, it does not allow for properly assessing *trade-offs* in organizations' implementation efforts across different policies in their portfolio. Moreover, existing research has ignored the phenomenon of growing burden load as a source of implementation problems.

### **An organizational perspective on policy implementation: the concept of policy triage**

To address these prevailing research gaps, we complement mainstream implementation research with a conceptual shift towards an organizational perspective. This way, we can study the impact of policy growth on the implementation activities of different organizations. We analyse the implementation of organizational policy portfolios and potential trade-offs across different policies within these portfolios rather than focusing on the implementation of selected, single policies. Our unit of analysis is no longer the *individual* policy or bureaucrat but the spreading of implementation problems over a given population of organizations in charge of implementation. We consider this analytical perspective particularly suitable to analyse the extent to which growing policy stocks and the implied overburdening of implementation bodies affect the prevalence of implementation deficits.

Addressing this question is far from trivial, not only because implementation research has identified many potential implementation problems but also because assessments of implementation as effective or ineffective might differ depending on the benchmark chosen (for an in-depth discussion, see Hupe & Hill, 2016). From a top-down perspective, implementation success or failure is typically measured in reference to the objectives defined in the decision-making process. From a bottom-up view, by contrast, implementation effectiveness is evaluated based on the degree of policy adjustment under the consideration of local peculiarities. Given these varying understandings, we rely on a definition of implementation deficits consistent with different analytical benchmarks being sufficiently broad to capture different kinds of implementation problems.

We rely on the concept of *policy triage* to compare variation and change in organizational implementation performance. Policy triage means that the organization privileges the implementation tasks related to certain policies or tasks over others. With growing overload, organizations are increasingly forced to take trade-off decisions of this kind. The higher the triage prevalence, the lower an organization's implementation performance is, as certain policies and implementation tasks are systematically and routinely neglected at the expense of others. We conceive of policy triage in *relative* rather than absolute terms. Organizations constantly make trade-offs in their day-to-day activities. Yet, any increase in policy triage or variation in triage frequency and severity across organizations indicates that these trade-offs might have reached a point from which implementation failures are more likely to occur and proliferate. The prevalence of implementation deficits is hence defined by the extent to which triage characterizes the organizational routines of implementation bodies. Consequently, we conceive *policy triage as an organizational pattern* – our analytical interest is in triage patterns that become apparent in organizational routines (Bayerlein et al., 2020).

Policy triage induced by overload might be driven by different 'logics' related to organizational performance, including effectiveness, efficiency, as well as legal and political accountability. If the effectiveness dimension prevails, for instance, an organization might concentrate its work on those policies with a higher impact on the achievement of policy goals. If efficiency concerns are dominant, less complicated policies and implementation tasks might be addressed with higher priority than more complex and time-consuming measures. By contrast, the dominance of legal accountability might favor a 'first come-first serve' approach, implying that older policies up for implementation will receive more attention than new ones. This pattern might differ completely if triage decisions follow concerns of political accountability. In these constellations it is well conceivable that implementation bodies focus their work on newly adopted measures at the expense of older policies. Moreover, political accountability might entail triage decisions based on the adopted organizational assessments of issue salience, implying that implementation resources concentrate on politically more salient policies.

Yet, the point here is *not* to come up with detailed accounts for the variation in organizational triage logics. We are rather interested in the frequency and severity of triage (of any conceivable logic). For this study the central point of departure is that any instance of policy triage ultimately leads to selective implementation and hence implementation deficits – regardless of the rationale guiding implementation bodies to prioritize some policies or tasks over others. In other words, we consider implementation deficits to increase with the extent to which administrative bodies rely on organizational routines that entail policy triage decisions when carrying out their implementation tasks.

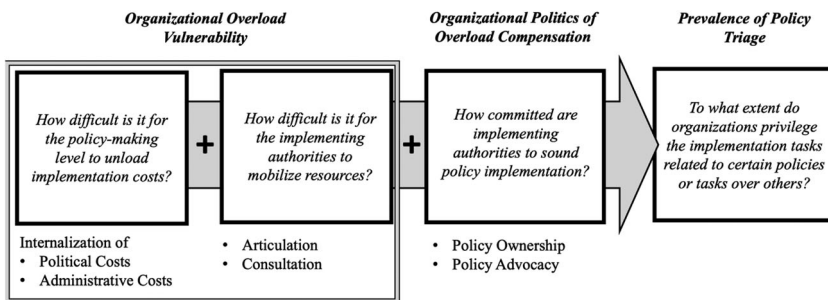
## Theory: policy growth and organizational policy triage

Which factors account for variation in the prevalence of policy triage across implementation organizations? In addressing this question, we depart from the general acknowledgment of growing sectoral policy stocks and resulting administrative implementation burdens. If these burdens are *not* compensated by expansions in administrative resources, the gradual erosion of organizational implementation capacities and the growing need for policy triage is the imminent result. If we accept this scenario as a baseline, the theoretical interest shifts to the factors which account for variation in the extent to which burden expansions are compensated by administrative resource expansions, i.e., the factors that moderate the causal link between policy growth and the prevalence of implementation deficits.

We argue that this link is affected by the interplay of two factors: organizational overload vulnerability and organizational overload compensation. While political constraints on unloading implementation burden and organizational opportunities to mobilize external resources determine the (1) *overload vulnerability* of implementation bodies, (2) *overload compensation* captures the organizational commitment to buffer and reduce overload through internal reforms. Our theoretical considerations, which we will discuss in more detail in the following, can be summarized as presented in [Figure 1](#). We expect that the risk of organizational policy triage in a given policy sector can be assessed by the interplay and configuration of these different mechanisms.

### Organizational overload vulnerability

Policy growth induced increases in implementation burdens will affect the involved organizations to different degrees, depending on their specific vulnerability of being overloaded. Overload vulnerability is not only determined



**Figure 1.** The Determinants of Organizational Policy Triage.



by constraints on policy-makers to unload implementation burden ‘for free’ but also by the organizational opportunities to externally mobilize for an expansion of administrative resources.

### ***Political constraints on unloading implementation burden***

The growth of policy portfolios is a central feature of advanced democracies, regardless of the country or policy sector under study. This process of ‘policy accumulation’ (Adam et al., 2019) often comes in the form of ‘policy layering’ (Hacker, 2004). New policy targets and instruments are added to existing policy portfolios, while existing arrangements are rarely replaced or terminated. Policy growth is not only driven by vote-seeking politicians who aim to demonstrate their responsiveness to the public and interest group demands by addressing the challenges citizens care about (Gratton et al., 2021). Policies are also governments’ primary problem-solving tools because they allow them to deal ‘with issues and problems as they arise’ (Orren & Skowronek, 2017, p. 3). Yet, while there are strong political incentives to produce new policies, it is overall *less rewarding* to dismantle existing policies, even when they turned out to be ineffective. Policies, once adopted, create expectations and dependencies and thus are difficult to terminate or dismantle (Bardach, 1976; Bauer et al., 2012; Pierson, 1994). Political incentive structures, therefore, result in governments typically adopting more policies than they eliminate over time.

The same logic, however, does not apply to the expansion of administrative capacities needed for properly implementing these new policies. As political responsibilities for implementation success are often unclear, politicians have weak electoral incentives to boost implementation capacities. Although such capacity expansions clearly improve implementation effectiveness, attributing such improvements to the actions of individual political actors is difficult for voters (Gratton et al., 2021). In addition, implementation effectiveness is not only a matter of administrative capacities but is also affected by many other factors. This weakens the incentives for political actors to engage in costly improvements of implementation capacities, while the fruits of gaining political credit by announcing ambitious policies are hanging much lower (Dasgupta & Kapur, 2020).

Yet, the extent to which these political incentives affect the overload vulnerability of implementation organizations depends on the political and administrative constraints that structure political decision processes on allocating organizational resources. Depending on these constraints, policy-makers might have to (partially) carry the costs of policy implementation (Knill et al., 2021). Implementation costs entail both political and administrative costs. Political costs refer to aspects of formal accountability – hence the extent to which policy formulators might be able to shift the blame for policy failure to the implementation level. Administrative costs, in turn, capture the provision of resources that are needed to execute a policy. This includes the

direct costs of policies, e.g., the costs of child benefits, and the administrative resources required for implementation in terms of staff, expertise, and offices. If the bureaucracies in charge of policy formulation are obligated to bear such costs, they have lower incentives to produce new policies as resources are limited. Based on these considerations, we can formulate a first conjecture that reads as follows:

Conjecture 1a: The prevalence of organizational policy triage decreases with the political constraints on unloading political and administrative costs to implementation bodies.

### *Organizational opportunities to mobilize external resources*

In addition to policy-makers also implementation bodies can politically influence patterns of policy production and the political provision of administrative capacity expansion. Similar to societal interests, public organizations might engage in strategies to avoid getting overburdened with ever-more policies up for implementation without corresponding capacity expansions. Yet the degrees of influence that implementation bodies exert in these endeavors vary. In particular, their potential to reduce their overload vulnerability depends on two factors, namely articulation and consultation. First, having a political ‘voice’ presumes articulation. To be influential, implementation bodies must be able to develop coherent positions on their preferred policy design options and their evaluation of previous policies. This potential to articulate a coordinated position presumes a minimum level of organizational integration across different implementation bodies such as the existence of associations of local or regional authorities that represent the interests of lower levels of government in central policy-making (Knill et al., 2021). Second, political influence presumes access to policy makers. The latter varies with the development of consultation procedures in which implementation bodies can present their concerns and positions to the bureaucracies in charge of designing new policy proposals. In this regard, the proximity of an implementation body to the policy formulators makes a difference. Implementation bodies located at the central level or even within the same ministry in charge of drafting policy proposals find it easier to emphasize overload problems than agencies that are located at the regional or local level. Similarly, political access might be facilitated by party politics and informal backchannels, e.g., when local authorities are governed by a council consisting of members of the same political party in charge at the central level. The respective conjecture reads as follows:

Conjecture 1b: The prevalence of organizational policy triage decreases with the political voice of implementation bodies (in terms of articulation and consultation) in policy formulation.

### **Organizational overload compensation**

Organizations in charge of implementation are not only passive receivers of administrative burdens. Instead, they can engage in organizational politics to 'balance' or compensate for their overload. This might include the reduction of organizational slack, the reallocation of resources, or the improvement of internal processes (Cyert & March, 1963). Yet not all administrations are equally eager and able to take such measures: They vary in their commitment to smoothen policy implementation and administrative reform (Peled, 2002). In turn, this commitment is likely to be determined by policy ownership and policy advocacy.

*Policy ownership* captures the extent to which the bodies in charge of implementation appreciate the benefits of the policies and accept responsibility for them. Policy ownership entails that implementing bodies must internalize underlying policy objectives and endorse the instruments selected to achieve these objectives (Osman et al., 2015). Whether organizations perceive policies as their own centrally is affected by the extent to which implementation bodies have discretion to engage in policy (re-)formulation and have competencies to specify policy outputs (Tummers & Bekkers, 2013). Moreover, ownership is also affected by the number of other bodies with whom a given policy has 'to be shared'. The more administrative bodies are involved and cooperate in joint implementation of policies, the lower the likelihood that an organization develops strong policy ownership and vice versa. In addition to policy ownership, *policy advocacy* influences the commitment to effective implementation (Bayerlein et al., 2021). Organizations driven by policy advocacy focus their internal routines on aspects directly related to the quality, internal consistency, and effectiveness of their policies (Simon, 1997). Such bureaucracies place little emphasis and effort on safeguarding or advancing their institutional position but work hard to improve policy effectiveness (Kaufman, 1958). The literature emphasizes a range of factors that contribute to the development of organizational policy advocacy. These factors include the professional homogeneity of administrative staff that facilitates the development of shared policy beliefs and an organizational 'esprit de corps' (Boyt et al., 2005). Overall, our final conjecture can be summarized as follows:

Conjecture 2: The prevalence of organizational policy triage decreases with the extent to which implementation bodies are committed to overload compensation (as a result of policy ownership and policy advocacy).

The above discussion suggests that the phenomenon of policy growth does not necessarily result in a chronic overburdening of organizations in charge of implementation and hence the continuous proliferation of implementation deficits. Rather the prevalence of such deficits depends on the configuration

of three factors that determine the internalization of implementation costs in policy production, organizational influence to mobilize external resources, and organizational overload compensation.

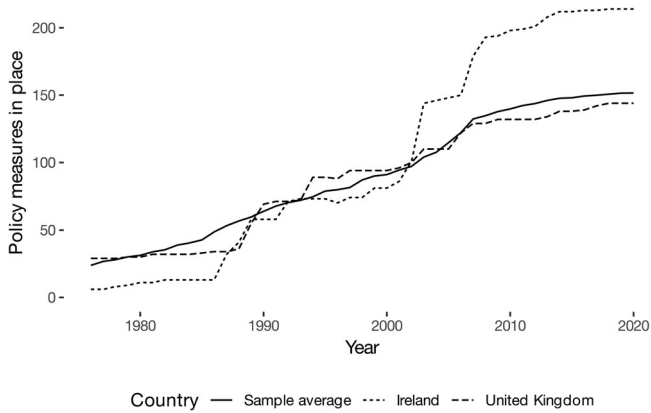
### Case selection and research design

In the remainder of this article, we illustrate our conceptual and theoretical considerations through four comparative case studies on the English Environment Agency (EA) and the Irish Environmental Protection Agency (EPA), as well as local authorities in both countries. We conducted expert interviews with regular staff, middle management, and senior management (for an overview of our methodological approach see the Online Appendix II). A semi-standardized questionnaire was used to investigate civil servants' perception of organizational overload and organizational compensation mechanisms. In addition, we used secondary sources such as media coverage of the organizations' work to evaluate the prevalence of implementation deficits.

We focus on environmental policy for two reasons: First, compared to more saturated policy areas like social policy, environmental policy is a comparatively young and dynamic field that is characterized by strong policy growth (Adam et al., 2019). Hence, environmental policy allows us to study our theoretical argument in a context where the growing implementation burdens are a highly likely scenario. Second, environmental policy is a field with a relatively 'standardized' policy corpus; i.e., there is a common understanding of the labeling and use of policy targets and policy instruments across countries – an aspect that holds in particular for countries being subject to Europeanisation (Knill, 2001).

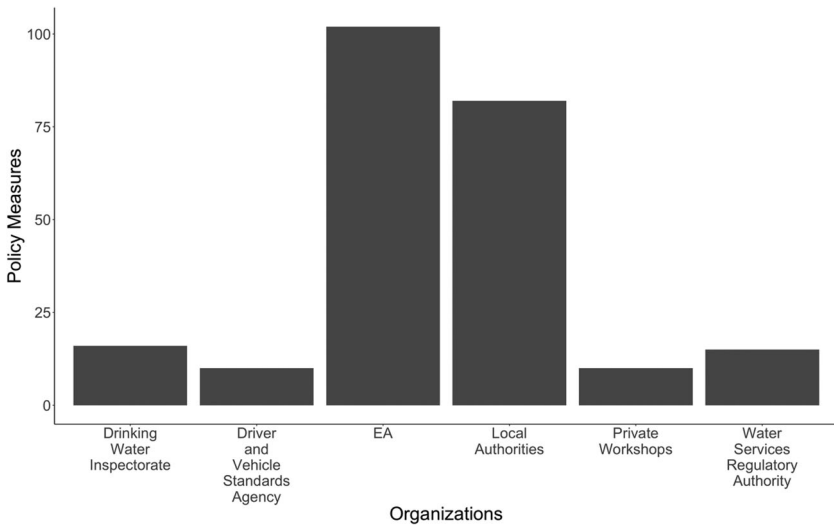
In selecting the countries under investigation, we opt for a most similar systems design to minimize the influence of alternative factors influencing triage decisions beyond our theoretical considerations. Ireland and the UK are both advanced OECD democracies and can be considered similar regarding their overall state capacity levels (Hanson & Sigman, 2019). They also display comparable rates of environmental policy growth, with Ireland revealing a more dynamic development from the 2000s onwards (see Figure 2). For more information on the measurement of policy growth see our online appendix (Online Appendix I). Both countries maintain the Anglo-Saxon administrative tradition and display highly similar structural arrangements regarding environmental policy implementation (Connaughton, 2019; O'Malley & MacCarthaigh, 2011). For the UK, we focus on England to bypass different levels of devolution.

The similar 'polity of implementation' (Sager & Gofen, 2022) allows us to study variation of organizational policy triage across and within countries. In so doing, we focus on the most critical implementing bodies in both countries. Figures 3 and 4 show how the implementation responsibilities

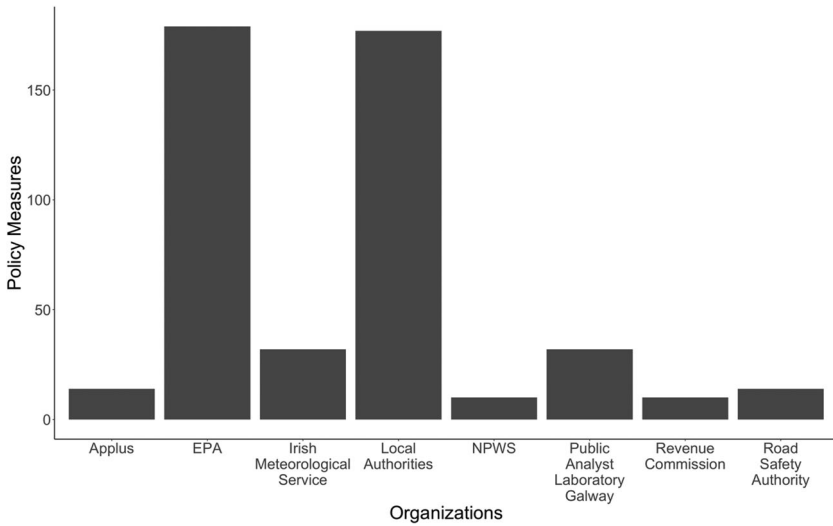


**Figure 2.** Environmental Policy Growth in Ireland and the UK since 1976 (compared to OECD average) (Source: Adam et al., 2017).

for the policy measures – i.e., the combination of a policy target and an instrument (see Online Appendix I for an in-depth illustration) – presented in Figure 2 are distributed across the different organizations. Here, multiple assignments are possible if a single policy is implemented by more than one authority. The figure reveals that in both countries, the vast amount of implementation tasks is performed by a central environmental agency and local authorities (district, county, or city councils). The implementation landscape is thus largely comparable in both countries. The EA is England’s central environmental implementation body, whereas the Irish equivalent is the EPA.



**Figure 3.** Environmental Policy Measures per Implementing Organization in England.



**Figure 4.** Environmental Policy Measures per Implementing Organization in Ireland.

Both organizations are independent non-departmental bodies, enjoying significant leeway in how they structure implementation. The two agencies also bear some responsibility in monitoring implementation on the local level, de facto making them superior bodies of the environmental administrative units of local authorities.

### **Empirical evidence: policy triage across Irish and English environmental implementation agencies**

We begin our empirical analysis with a comparison of policy triage in the EPA and the EA, presenting rather extreme, opposing cases: The Irish agency shows little signs of policy triage due to low vulnerability and sophisticated compensation mechanisms. The EA, on the other hand, is highly vulnerable to overload while at the same time being severely limited in its compensatory capacity, resulting in very high levels of policy triage. When scrutinizing Irish and English local authorities in perspective with the countries' central agencies, we also find striking variation corroborating our theoretical arguments. Compared to the EPA, the City and County Councils in Ireland frequently engage in triage. In England, by contrast, local authorities in England show significantly lower levels of policy triage prevalence compared to the EA.

#### ***Policy triage prevalence in the EPA and the EA: two extreme cases***

The Irish EPA shows little signs of overload-induced triage. The only instances the organization might be falling behind with certain tasks is due to the lag

between task and resource allocation. As one interviewee noted, usually there is a lag of two to three years, a period that can be quite exhausting and stressful (IR21051001). Yet in line with conjecture 2 staff composition and high levels of motivation allow the organization to compensate for that shortfall (IR21052803). When additional tasks are added to the organizational workload, 'there's always an excitement and an energy around [...] and they [the staff] do embrace the challenge' (IR21052702). However, all interviewees noted that overload is generally well-contained and the extent of implementation deficits is limited to some actors occasionally having to wait longer for permits (IR21053104). In a recent review by the OECD, the agency was described as meeting its objectives without having to resort to major triage decisions during the implementation process (OECD, 2020, p. 14).

The English EA, by contrast, reveals the opposite scenario. Frequent instances of severe triage are observable. Monitoring duties were cut back and the response rate to complaints and incidents has deteriorated over the last few years (Laville, 2020). Trade-offs are encountered 'every second of every day' (EN22042003). A leaked policy briefing stated that efforts spent on low-risk incidents should be reduced. Instead, capacities should be funneled towards ramping up 'charge funded regulation' (EA briefing in Salvidge, 2022). According to an EA officer, 'unless there were dead fish floating everywhere', no on-site inspection would be conducted (Salvidge, 2022). In other words, the agency prescribed massive trade-offs by favoring income generating measures over non-profitable monitoring and surveillance tasks. This strategy is part of a system internally known as 'Incident Triage Project'. Its broader goal is to reduce 'overall effort spent on the incidents that present the lowest risk to the environment' (EA briefing in Salvidge, 2022) and focus on higher impact events instead. Yet, one EA officer noted that incidents such as an oil or sewage spill are often reported as being of lower priority and upgraded to a higher category after verification only (Salvidge, 2022). However, when no officer is on-site to assess the magnitude of the incident, damages could be significantly larger than initially assumed. In summary, policy triage has become an essential part of the organization's modus operandi informally and as part of the official strategy. As will be shown in the following, the sharp contrast in policy triage between both organizations emerges not only from marked differences in overload vulnerability but also from different compensation levels.

### *Organizational overload vulnerability*

While the political constraints on unloading implementation burdens are similar for both agencies, the EPA is in a much better position to mobilize additional resources, compared to the EA. Following conjecture 1a, the EPA is less vulnerable to overload compared to the EA. For both agencies, few constraints hinder policy-makers from unloading implementation burdens

without corresponding expansions of administrative resources. Although political accountability for both agencies remains with the governments, actual responsibility in case of environmental problems, disasters, or emergencies for example is largely bypassed via task delegation to the independent environmental agencies (Bell & Gray, 2002). Yet in addition to political costs, administrative cost considerations might constrain political policy production. Although policy-makers in both countries face few formal limitations in the sense that they are not legally required to compensate their agencies for additional burdens, the latter are nonetheless dependent on resource provided by the central government, essentially creating informal constraints on uncompensated unloading.

While political constraints are at moderate levels for both agencies, significant differences exist regarding organizational opportunities to mobilize external resources. The Irish EPA constantly gathers and articulates feedback from subunits and the street-level and channels it into a unified organizational response vis-a-vis the formulating level (IR21061006). In line with conjecture 1b, the organization continuously maintains channels and seeks out opportunities for external resource mobilization. Interviewees have noted that formal and informal mechanisms exist to facilitate horizontal coordination between administrative units and the vertical exchange between different hierarchical levels of the organization (IR21052803). An excellent example would be the so-called 'cross-office knowledge exchange network' geared towards linking 'people in different policy and functional areas' (IR21052702). The EA, on the other hand, struggles regarding external resource mobilization (EN22050904). Specifically, the management and the street-level's conflicting ideas on the agency's goals make articulating a single organizational position difficult. Critics of the organization repeatedly pointed at the EA's 'lack of an integrated vision' (Bell & Gray, 2002, p. 93) which limits its ability to formulate and articulate a coherent position vis-a-vis the formulators. Similar differences exist regarding political access, although the de-jure status of the central environmental agencies in the two countries is quite similar. However, in practice, the status of an independent or non-departmental agency is interpreted quite differently in Ireland and England. In the latter case, the EA is kept at arm's length by the environmental department. In Ireland, on the other hand, the relationship between the department and the EPA is close despite its status as an independent agency (IR21061006). Ireland also has the advantage of being a small country: Staff working on the formulating and implementing side tend to know each other on a personal level (IR21053104). Consequently, the EPA has significantly more opportunities to mobilize external resources than its English counterpart, curtailing the prevalence of policy triage. For the EA, by contrast, limited opportunities for resource mobilization imply that the EA's parent department was able to massively reduce the budget over the



last few years without facing significant repercussions (Laville, 2021). In line with conjecture 1a, the English formulating level faces few constraints when unloading political and administrative costs, increasing the prevalence of organizational policy triage in case of the EA.

### *Organizational overload compensation*

Both agencies also display stark differences in their commitment towards overload compensation. In the EPA, strategies for maximizing efficiency and effectiveness are part of the organization's internal routines. For example, slack resources are used through mechanisms such as workforce planning, where every head of units periodically submits documentation estimating their projected demand (IR21052803). Organizational resources are then allocated accordingly. Agility and flexibility are fundamental characteristics of the agency's human resource management. New teams from various parts of the organization are regularly formed to deliver new mandates. According to one staff member, this is 'drummed into all of the staff: you can and will be moved and asked to do things to help deliver on priorities as they arise' (IR21052702). In addition, the organization substantially engages in staff training efforts, spending about 3–4 percent of its annual budget there.

The EA also engages in internal resource mobilization, yet the use and distribution of slack resources across the organization are limited due to the restricted interactions across divisions. Facing massive overload, the agency was forced to reform. However, the agency's management decided to move staff from unprofitable units such as monitoring into income-generating entities such as licensing. An EA staffer noted that 'if you can't charge for something it gets a lower priority' (Salvidge, 2022). Yet, additional income has been put into reinforcing middle management financials rather than the street-level (Salvidge, 2022). Moreover, according to one staff member, overall expertise seems to decrease as the organization currently deals with high staff turnover rates and long-serving officers retiring (EN22050904). Consequently, the EA not only fails to seize opportunities for external resource mobilization but at the same time also struggles to maintain internal resources such as staff and expertise in core areas.

This marked variation can only be partly explained by differences in policy ownership. Both agencies have considerable discretion in specifying policy outputs (IR210552702; EN22042003) and largely fulfill their tasks without the need to coordinate themselves with other organizations. Differences are much more pronounced, however, regarding policy advocacy. The EA scores low, mainly because internal goal conflicts undermine organizational policy advocacy. While its staff seems relatively homogeneous at first, two aspects counter this observation. At its creation, the agency was consolidated from many organizations (Bell & Gray, 2002; EN22042003). Internal conflicts concerning the goals, vision, and principles of operations were heavily

contested, chiefly among the scientists of Her Majesty's Inspectorate of Pollution and street-level administrators of the Waste Regulation Authorities. Inspectors' repeated complaints about poor monitoring and enforcement standards were ignored. Frequent instances of whistleblowing have been reported despite threats of reprimands (Laville & Salvidge, 2022). Generally, the EA is divided internally between the management and operational level, severely limiting its potential for policy advocacy and ownership on the organizational level. In line with conjecture 2, commitment towards overload compensation thus remains limited. While commitment on the individual level became apparent in the interviews, the agency fails to channel this commitment into a broader organizational response to decrease the extent of policy triage.

In contrast, the EPA's leadership has been described as easily capable of eliciting a sense of a shared vision among staffers (IR22030226). One interviewee noted that their colleagues are highly qualified in their area of expertise and like the challenge of advancing new policy (IR210552702). According to another EPA member, part of the organization's DNA is 'a sense of ownership over [its] objectives and policy goals' (IR21051001). Following conjecture 2, the EPA displays a high level of internal commitment towards dealing with overload. The EA's commitment, on the other hand, is limited due to low levels of ownership and advocacy. It also lacks the channels required to project individual commitment onto the organizational level.

In conclusion, despite similarities between the English and Irish systems, the two national environmental agencies display high variation in their resort to policy triage (see Table 1). In the case of the EA, high overload vulnerability cannot be equalized by pronounced capabilities for compensation, in fact, quite the opposite: policy triage is part of the organization's internally prescribed modus operandi. The EPA, on the other hand, shows minimal instances of triage processes due to little organizational vulnerability combined with high levels of compensatory commitment.

### ***Comparing policy triage in local and central implementation bodies***

Local agencies in Ireland and England strongly deviate from the levels of policy triage we find for the respective national agencies. While authorities in both countries engage in triage, English ones do so less often than the EA. In contrast, local authorities in Ireland are forced into triage decisions more often than the EPA. Interviewees frequently noted that tasks associated with the implementation get cut short, either due to resource or time constraints (IR22011112; EN22040502). As local environment and transportation tends to be combined in one unit in both countries, trade-off decisions are often made between economically and environmentally motivated policies (EN22052305; IR22031127; Jonas & Gibbs, 2003). In addition, elected

**Table 1.** Policy Triage and the EPA and EA.

	<b>Overload Vulnerability</b>		Overload Compensation	Triage Prevalence
	Political Constraints on Burden Unloading	Org. Opportunities to Mobilize Resources	Policy Ownership & Advocacy	
<b>EPA (Ireland)</b>	<b>Medium:</b> Moderate political and administrative costs of unloading	<b>High:</b> Coherent articulation of organizational goals; close relationship with parent department	<b>High:</b> High levels of policy ownership; strong identification with organizational and policy goals; high levels of advocacy due to strong esprit de corps	<b>Low:</b> Little to no instances of triage observable
<b>EA (England)</b>	<b>Medium:</b> Medium political and administrative costs of unloading	<b>Low:</b> Incoherent articulation of organizational goals; distant relationship with parent department	<b>Low:</b> Low levels of ownership; identification with goals but organizational prioritization of income-generating policies; Low levels of advocacy tasks due to little esprit de corps	<b>High:</b> Frequent and severe instances of triage

council officials are ultimately responsible for prioritizing tasks across the entire organization making resource distribution a politicized process (IR22031127). As one representative of local government noted, at the end of the day they are accountable to the public and their ‘priorities come from [public] feedback’ (EN22052305). While policy triage is observable for local implementation bodies in both countries, these patterns deviate strikingly from the extremes observed for the central agencies in both countries.

***Overload vulnerability on the local level***

In principle, the constraints that the formulating levels in both countries face when unloading implementation burdens on local authorities are limited. Ultimate responsibility and supervision of local implementation in Ireland and England are delegated to the EPA or the EA respectively. Thus, little accountability is left to the department or ministry responsible for formulating policy. However, English authorities — at least under conservative leadership — enjoy a ‘party bonus’. As a member of a Conservative-dominated County Council remarked, consultation between local and central units is quite good, enforced by the fact that the party itself provides channels for consultation (EN22052305). In addition, the party also acts as an informal venue for articulation as it ‘organizes a policy forum where [...] there’s a means to transmit either your positivity with that policy or your challenges you feel that policy brings’ (EN22052305). The Conservative-controlled

formulating level in England thus risks party-internal backlashes from local authorities when unloading excessive burdens on them, essentially creating informal constraints conceptualized in conjecture 1a. While there might be some variation among local authorities, the non-partisan EA lacks those political channels altogether. Consequently, political constraints on unloading uncompensated burdens on the local level are significantly higher compared to the EA.

In Ireland, by contrast, there is no 'party bonus': Local authorities generally report similar issues regardless of political orientation. There are few factors constraining formulators to unload burdens on the local level. While consultations generally do occur between the local and the central level, outcomes are mixed: 'sometimes there is consultation, but sometimes that consultation doesn't result in change' (IR22030226). This is in stark contrast with the strong advisory role of the EPA which is involved in all environmental legislation stemming not only from the national but also the European level. Limited interaction between local implementers and formulators on the central level as well as the absence of potential backlashes provide little incentives to curb growth. Consequently, insufficiently compensated unloading of tasks is the norm leading to an increase of triage prevalence, in line with conjecture 1a. A recent example would be the introduction of measures combating climate change such as locally implemented net zero emission targets (IR22031127). Here, resources have not been allocated in proportion to the additional workload which led to frustration and a steep increase in triage activity (IR22031127).

Generally, local authorities in both countries try to seek and seize opportunities for external resource mobilization. When it comes to articulation of common positions of implementing bodies, Ireland again has a bias towards the central agency. Efforts have been made to mitigate this situation, most recently by creating the Local Authorities Water Program: The shared service is meant to increase articulation and networking for water related issues, linking authorities with the formulating level and other stakeholders (IR22030226; IR22011213). Yet as LAWPRO is a fairly new agency its political voice is still rather quiet compared to the EPA's heavy political clout. On a broader scale, representatives in Ireland have lamented that local authorities lack the opportunities the EPA has in external resource mobilizations. Following conjecture 1b, limited opportunities for consultation and articulation of their position and resource demands increase the prevalence of triage: Whereas the central agency easily receives funding to increase its oversight capacities, resources are made available to the local level only scarcely (IR22012518). Those obstacles also extend to the mobilization of additional staff: 'If I want to employ an extra person, I actually have to go to national government to get permission' (IR22011916). While the EPA faces similar constraints regarding hiring, the organization can pick from a pool of highly

qualified candidates as the number of applications regularly exceeds the available positions by large. In contrast, especially in more rural parts of Ireland, finding qualified staff can be a challenge. In particular, the fact that units dealing with environmental policy locally tend to contain positions not easily filled or reinforced further limit avenues for external resource mobilization (IR22011916).

In England, party politics also play a central role regarding the opportunities local authorities have in the mobilization of additional resources. Just as a close connection between political formulators and local authorities constrains uncompensated policy growth, it also opens up additional opportunities for the mobilization of additional resources. Yet, it should be noted that predominantly Conservative-controlled entities profit from those opportunities. Authorities governed by Labor described significantly more obstacles: ‘the dialogues are there but more often than not, we don’t get the kind of response we ideally would want’ (EN22040502). Nonetheless, sufficient articulation and consultation are ensured by a vocal local government association (LGA). Furthermore, local authorities in England enjoy significant leeway in the mobilization of financial resources. About 50 percent of local funding is derived from taxes collected locally (Institute for Government, 2021), providing authorities with broader opportunity structure to mobilize resources externally compared to the EA.

### *Local commitment to overload compensation*

Regarding overload compensation, there are again pronounced differences compared to the national agencies in both countries. To some extent, policy ownership is characterized by the relationship local authorities have with the central agencies as it is ultimately them granting discretion in implementation. In Ireland, the EPA’s stern oversight severely limits avenues for policy ownership by restricting local authorities’ level of policy discretion and reformulation leeway. If the organization concludes that a local authority is not enforcing legislation, they can come in and instruct them to carry out specific tasks (IR210552702). Unsurprisingly, this can be a source of tension as one local government representative pointed out: ‘The EPA has developed over the years more of a policing culture and less of a partnership culture. [...] They do their annual report and sometimes it can be quite hard-hitting [for local authorities]’ (IR22011916). In addition, Irish representatives have expressed a feeling of being instrumentalized by the central level: ‘Sometimes you definitely do get pieces of legislation that had been written in a vacuum, in a black box and is handed down. [...] So there definitely is a disconnect between those who make policy [...] and those who have to implement the policy that’s made by others’ (IR22030226). Irish local authorities are

also unable to reach the same level of policy advocacy as the EPA. Staff composition is heterogeneous as local environmental units employ a variety of staff with different backgrounds (IR22030226). Consequently, developing an esprit de corps not only within a given sub-unit but organization-wide is challenging. In line with conjecture 2, comparatively low levels of policy ownership and advocacy limit local authorities' commitment to overload compensation in Ireland and increase the prevalence of policy triage— at least compared to the high performing central agency.

When it comes to English local authorities, the relationship between the EA and the local actors is quite different from the Irish case: Unlike the EPA, the EA perceives itself as a partner of local organizations rather than a strict supervisory body, granting them significant levels of discretion in implementation (EN22033101; EN22050904). Interactions between local authorities and the EA have been denoted as 'incredibly positive' (EN22052305). Especially against the backdrop of the EA's realignment of organizational goals towards income-generating measures and high staff turnover rates, local authorities – notwithstanding their heterogeneous staff composition – have a stronger sense of policy ownership and advocacy. Following conjecture 2 the local level in England is more committed to the compensation of overload than the central agency and consequently engages in policy triage less frequent.

In conclusion, when contrasting Irish and English local authorities with the national agencies, we observe significant variation within the two countries: Following our conjectures, policy triage in England is significantly more contained on the local than on the central level (see [Table 2](#)). On the one hand, formulators face more constraints when unloading burdens on local agencies compared to the EA. Particularities of the English two-party system provide certain authorities with extensive opportunities for resource mobilization that the EA does *not* have. Also, local authorities' ability to generate tax income provides another avenue of mobilizing resources independent of the central level. Lastly, the supervisory laissez-faire approach of the EA enables local authorities to develop quite a sense of policy ownership and advocacy.

In Ireland, by contrast, policy triage at the local level is higher than for the national agency. Few factors constrain the formulating level from unloading tasks on local authorities (see [Table 3](#)). Compared to the EPA, opportunities for external resource mobilization are rare. Extensive influence on policy formulation is limited to the EPA, severely curtailing City and County Councils' political voice. In addition, the central agency's strict supervision of local authorities leaves little discretion in specifying policy output, curtailing the prevalence of policy ownership and advocacy.

**Table 2.** Comparing Organizational Policy Triage in Ireland.

	<b>Overload Vulnerability</b>		Overload Compensation	Triage Prevalence
	Political Constraints on Burden Unloading	Org. Opportunities to Mobilize Resources	Policy Ownership & Advocacy	
<b>EPA (Ireland)</b>	<b>Medium:</b> Moderate political and administrative costs of unloading	<b>High:</b> Coherent articulation of organizational goals; close relationship with parent department	<b>High:</b> High levels of policy ownership; strong identification with organizational and policy goals; high levels of advocacy due to strong esprit de corps	<b>Low:</b> Little to no instances of triage observable
<b>Irish City and County Councils</b>	<b>Low:</b> Low political and administrative costs of unloading, resources centrally administered; hurdles towards increasing administrative resources	<b>Medium:</b> Articulation of organizational goals via local government agencies and LAWPRO; Consultations often without impact	<b>Low:</b> Low levels of policy ownership (little discretion granted by the EPA); Medium levels of policy advocacy (multi-purpose structure of local authorities but local impact awareness)	<b>Medium:</b> Frequent instances of triage, severity limited by low risk nature of policies

**Table 3.** Comparing Organizational Policy Triage in England.

	<b>Overload Vulnerability</b>		Overload Compensation	Triage Prevalence
	Political Constraints on Burden Unloading	Org. Opportunities to Mobilize Resources	Policy Ownership & Advocacy	
<b>EA (England)</b>	<b>Medium:</b> Medium political and administrative costs of unloading	<b>Low:</b> Incoherent articulation of organizational goals; distant relationship with parent department	<b>Low:</b> Low levels of ownership; identification with goals but organizational prioritization of income generating policies; Low levels of advocacy tasks due to little esprit de corps	<b>High:</b> Frequent and severe instances of triage
<b>English Local Authorities</b>	<b>Medium:</b> Little accountability of policy formulators, but party political constraints on uncompensated growth	<b>Medium / Low:</b> Articulation and consultation facilitated via party forums. Medium values apply to local authorities when governed by the same party as the central level; low values to authorities governed by the opposition party	<b>Medium:</b> Medium levels of ownership (policy formulated centrally but high levels of discretion granted by EA). Medium levels of advocacy task limited by multi-purpose structure of local authorities but local impact awareness.	<b>Medium:</b> Some instances of triage, but severity limited by low risk nature of policies.

## Conclusion

This article started with the observation that adopting new policies without parallel expansions of implementation capacities will lead to a creeping overburdening of implementation bodies and negatively affect the overall implementation effectiveness. So far, this phenomenon has remained unexplored in conceptual, theoretical, and empirical terms. Conceptually, the focus has typically been on the study of implementation processes of individual policies, while a more holistic approach capturing the implementation of policy stocks at the level of organizations has been completely absent. To address this deficit, we introduced the concept of organizational policy triage that takes account of trade-offs and interactions between different policies up for implementation. To account for organizational variation in policy triage, we developed a novel theoretical framework that explains policy triage prevalence on the basis of two factors: organizational overload vulnerability and organizational overload compensation. We illustrated the analytical use of the concept of policy triage and the explanatory relevance of our theoretical argument through a comparative study covering the national environmental agencies in England and Ireland as well as local authorities in both countries. On the national level, we found diametrically opposing cases of high (EA) and low triage prevalence (EPA), determined by different levels of overload vulnerability and organizational compensation. Furthermore, in comparing local authorities with the respective national agencies, we showed that variation in organizational overload vulnerability and overload compensation also account for the more fine-grained discrepancies in policy triage prevalence across the different sectoral organizations within both countries under study.

While the concept of policy triage offers a range of analytical strengths, we are aware of the fact that our empirical illustration only constitutes a first plausibility probe of the soundness of our analytical considerations. We consider it a promising avenue for future research to investigate variation in implementation deficits more systematically. In this regard, a promising avenue might be to study the involvement of private actors within collaborative governance structures more closely. While our interviews indicate that private actor involvement in the implementation process creates more capacity challenges than it solves (see Online Appendix III for quotations), more systematic evidence is needed.

## Note

1. For a discussion on the measurement of policy growth, please consult the Online Appendix I.



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