

Commentary

Governance and accountability of environmental NGOs

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Abstract

The issue of the governance and accountability of environmental non-government organisations (ENGOS) is gaining in prominence in academic and public discourse. Ideally each sector of society should be characterised by a distinct accountability regime, but faced with calls for greater accountability there is a risk that ENGOS might apply accountability regimes uncritically from the business or private sector. This could undermine the independent change-agent role of ENGOS and therefore weaken aspects of the democratic system. The present paper argues that ENGOS, and the NGO sector in general, need to develop and debate a distinct and credible accountability regime that strengthens and defines their role in society. In support of this goal a framework for conceptualising a legitimacy-based approach to accountability is described. This is based on the observation that NGO capacity for impact is founded on different types of legitimacy that together establish and maintain public trust. One role of governance is to maintain and strengthen these legitimacy assets by establishing and over-seeing accountability streams that recognise that public trust is built on the cumulative evidence of legitimacy.

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1. Introduction

This article is a contribution to the growing debate on the governance and accountability of environmental non-government organisations (ENGO), with a focus on household name environmental groups with annual turnovers in excess of € 15 million. The article begins by discussing the rise of the issue and its potential implication for environmental policy. The second section explores the question of NGO legitimacy which, for the purpose of this article, is employed as a conceptual framework for discussing the governance and accountability issue. The third section develops the idea of a legitimacy-based approach towards ENGO accountability as a means to build an effective and distinct accountability regime for the sector. The arguments and frameworks developed in these latter two sections are relevant to questions of governance and accountability relating to the wider NGO sector, social enterprises (Dees, 1998) and indeed values-led organisations in general.

The article arises from an on-going programme of research that first considered ENGO performance measurement (see Jepson and Canney, 2003a) and is now moving on to explore questions of governance, accountability and legitimacy. In particular, it draws on presentations, debates and insights arising from the ‘green power: green responsibility’ lecture series convened by Linacre College and the Environmental Change Institute of the University of Oxford during February and March 2004 in which chief executives of six ENGOS were invited to reflect on the basis of their organisation’s success and comment on the issue of accountability and governance. The speakers, in order of appearance, were Tony Juniper,¹ John Elkington,² Graham Wynne,³ Kate Parminter,⁴ Robert Napier⁵ and Steven Sanderson.⁶ A review of each lecture is available at <http://www.eci.ox.ac.uk/linacrelectures04>.

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2. The rise of the governance and accountability issue in the environmental sector

The topic of governance and accountability gained new relevance during the 1990s for a combination of reasons. These include: (a) the role of NGOs in creating an international civil society that articulates powerful normative regimes that influence the practices and policies of international institutions (Brown and Moore, 2001); (b) the ‘roll back of the state’, which has sub-contracted delivery of public services to complex partnerships that make it very difficult for citizens to attribute responsibility to any one institution or individual for the quality, effectiveness and efficiency of delivery (Leat, 2004); (c) the growing perception that together these aspects of neo-liberal economic theory and globalisation are enabling publicly unaccountable markets, corporations and inter-governmental bodies to become overly dominant in dictating the values and policies that form the context of everyday life.

The environmental movement is deeply involved and implicated in the above sources of concern. On the one hand, its campaigning role in exposing environmental wrongdoing and calling corporations to account has helped reveal the shift in power from representative governments to unelected corporations, trade bodies (e.g. WTO) and financial markets. Environmentalists have been influential in creating a sense in the public mind that such trends are worrying and have helped secure the NGO voice at high-level policy fora. On the other hand, many NGOs have willingly supported the move to shift public service delivery

to civil society (e.g. Edwards and Hulme, 1995) by lobbying for lucrative contracts to supply data, for example analyses on the state of the environment, or to deliver components of development projects.

This engagement in mainstream politics and public service delivery has increased the resources available to ENGOs, through membership subscriptions, private philanthropy, public sector grants and/or corporate contracts. As a result, several ENGOs have transformed themselves into organisations with international reach and influence: at least 20 are now ‘household name’ organisations with annual turnovers in excess of €15 million, hundreds of paid employees, and possessing ‘branded’ conservation solutions and sophisticated marketing, advocacy and policy departments (see Table 1). In short, these ENGOs are now part of inter-state and/or national power structures.

From the outside, these NGOs look and act increasingly like a morph between trans-national corporations and government development agencies. As a result scholars, policy analysts, journalists and activists with an interest in this field are starting to direct the same concerns of public accountability to these ‘green-chip’ ENGOs as were previously directed to other primary sectors in society. As Edwards (2004) points out, if NGOs challenge the accountability of other social actors, they must themselves be accountable, otherwise their legitimacy will decline and with it their capacity to advocate their cause successfully.

A combination of reasons, many of a pragmatic nature, appears to have brought the topic of governance and accountability to the top of the agenda in the environment

Table 1
‘Green-chip ENGOs’: non-government environmental organisations with annual turnovers in excess of € 15 million

Organisation	Country code	Year founded	Approximate turnover € (2003)	Number of staff on payroll
The Nature Conservancy	US	1951	586.5	2995
BirdLife International Partnership	Intl	1993	224.1 ^a	4939
WWF—The Global Conservation Organisation	Intl	1961	212.4	4000
Wildlife Conservation Society ^b	US	1895	114.5	1067
RSPB ^(BirdLife Partner)	GB	1889	107.5	1275
WWF International	CH	1961	80.7	180
World Wildlife Fund-US	US	1961	78.6	376
Natuurmonumenten	NL	1905	77.7	313
National Audubon Society ^(BirdLife Partner)	US	1886	54.7	707
WWF-UK	GB	1961	50.7	288
International Fund for Animal Welfare	Intl	1992	42.1	200
Wereld Natuur Fonds (WWF-Holland)	NL	1963	41.8	90
British Trust for Conservation Volunteers	GB	1959	34.4	724
Conservation International	US	1987	33.5	766
Wetlands of America Trust	US	1985	19.6	?
Sierra Club	US	1892	18.2	550
Zoological Society of London ^b	GB	1826	30.6	420
WWF Deutschland	DE	1963	25.5	100
Naturschutzbund Deutschland ^(BirdLife Partner)	DE	1899	19.2 ^a	90
Wildfowl and Wetlands Trust ^b	GB	1946	14.9	281
Society for Protection of Nature In Israel ^(BirdLife Partner)	IL	1954	Unreported	800

Note: BirdLife International and WWF are federations of independent national organisations. Those with incomes in excess of 15 million on included in the table and indented. Data from Charity Navigator, Guidestar and annual reports. Figures are indicative only.

^a 2002 figures.

^b Operations include zoological parks.

sector. One is the view among some leading ENGOs, such as WWF, that engagement with major corporations is essential in order to achieve their mission. As part of entering a strategic partnership, many corporations now expect a major ENGO to meet similar governance and accountability standards to their own. A second, is the growing reflective and critical literature on development NGOs (Edwards and Hulme, 1995), and the appearance of progressive-leaning publications on NGO accountability, notably the report by Sustainability (2003) *The 21st Century NGO* that linked accountability with gains in organisational growth, stability and impact.

A third reason is the growing recognition that despite the large investments in the last 20 years – the thousands of projects and trained professionals and billions of dollars spent – progress in conservation on the ground has been slow and erratic (Salafsky et al., 2002). As a result some major donors, particularly American Foundations, are pressuring NGOs for evidence on how they spend their money, how they learn and how well they have been achieving their aims (Christensen, 2002, 2003; Randerson, 2003). Related to this, the electronic communication revolution and cheap air travel has catalysed a range of new accountability demands by bringing funding agencies much closer in time and space to ENGOs and the places they operate (Hilhorst, 2003). Whereas 15 years ago a donor had only intermittent communication with environmentalists working in the field, nowadays this relationship can involve weekly email communication and annual appraisal visits.

A fourth reason is the growing unease of many experienced environmental practitioners concerning the growing numbers and influence of managers and bureaucrats recruited from outside the movement within leading ENGOs, and the marginalisation (often to the disempowered world of free-lance consultancy) of those with a more traditional view of the values and goals of conservation and environmentalism (Jepson and Canney, 2003b; Oates, 1999).

A fifth, and perhaps the most influential, reason why ENGO governance and accountability is a hot topic, is the publication by the Washington Post in 2003 of a series of articles exposing questionable financial, management and scientific practices in The Nature Conservancy (TNC). Founded in 1951, this US body had an income of € 674 million (US\$ 865 million), net-assets (principally constituted of land-holdings) of € 2.73 billion (US\$ 3.5 billion) and a salary-bill (staff and consultants) of €141 million (US\$ 181 million) in financial year 2003/2004 (<http://www.nature.org/aboutus/annualreport/files/arfinancials2004.pdf>). As such it is by far the world's largest ENGO (Table 1). In 2003, high-profile accounting scandals at Enron, Adelphia and Worldcom had primed the American public for the collapse of a major institution. As a result federal and state governments, public and private watchdogs and individuals responded to the Post's revelations with an onslaught of suspicion that shocked the leaders of TNC into reforming its governance structure (Pannel, 2004) and sent shock-waves throughout the environmental movement.

Question and answer sessions in the 'green power: green responsibility' series debated whether a major UK ENGO could be subject to a TNC-like media attack. The general view of the six CEOs was that the operating environment in the UK (specifically the lack of tax breaks) combined with strong organisational norms meant that acts of news-worthy impropriety were hard to imagine. Parminter (CPRE) was less sure pointing out that Trustee oversight of some charities (not specifically ENGOs) was woeful and a scandal concerning the waste of human and other resources was possible. The point also was made that calls for greater accountability were not being picked up from their membership or the UK public. But as Elkington pointed out, an accountability crisis does not build up incrementally: as TNC found out it can appear suddenly and as a spike of rhetoric and suspicion. In his view, ENGOs need to guard against such an eventuality by reviewing their governance and assessing their accountability 'deficit'.

3. Barriers to probing the accountability issue

Based on 81 completed audience feedback questionnaires, a substantial proportion of the audience were unconvinced that CEO recognition of the accountability issue is being translated into actions within their organisations. There was a sense that the issue is enormously complex and that ENGO leaders are struggling to know what to do. Comments from the CEOs suggest that there are at least five major barriers, or worries, hampering a serious and open discussion of the issue:

1. ENGOs will come under pressure from regulators and donors to expand performance metrics and reporting, which will lead to a raft of new and costly bureaucracy that will divert scarce resources from the cause and do little to enhance efficiency and impact ('bureaucratic drag').
2. The government will respond with knee-jerk, one-size-fits-all regulations that will not do anyone any good.
3. Discussing accountability will expose weakness that will be seized upon by anti-environmentalists and other groups seeking to curb the power of ENGOs.
4. Admitting to weaknesses, particularly in project delivery, could jeopardize donor funding in a highly fickle and competitive market.
5. The complexity and fuzziness of the accountability issues negates the identification of clear operational policies and assessment of their risk.

The first and second concerns reflect the uncertainty surrounding the contents of a new UK Charities Bill, which was due to be published in June 2004, but also a more general and deeper disillusionment with government and the validity of a key belief in neo-liberal economics and neo-liberal democratic theory, namely that markets and private

initiatives are the most efficient means for achieving economic growth and providing most services to most people. One manifestation of this was the extended contracting of public service-delivery to outside bodies including NGOs (see [Edwards and Hulme, 1995](#)) and the need for these bodies to adopt a culture of setting and auditing targets of performance and procedural efficiency. Many believe the audit culture has failed in its goals of accountability and transparency and reduced the time available to professionals for front-line service delivery (see [Townsend and Townsend, 2004](#)). Such views are common-place within those ENGOs that have received grants managed by development agencies and witnessed the way the associated bureaucracy either ties up experienced field staff in endless rounds of grant writing, evaluation and reporting and/or necessitates the hiring of staff from development agencies.

The third worry is particularly acute among campaigning NGO networks such as FoE and Greenpeace. These organizations engage with the political process to achieve their mission because they believe, in the words of Tony Juniper, that *‘Political outcomes are determined by political forces’*. These ENGOs built their political influence on their adept use of the new global news media in the 1980s, and recognize that powerful adversaries (for example, those opposed to US ratification of the Kyoto protocol) could turn factions of the media against ENGOs given credible third-party evidence of failings.

The fourth worry concerning donor reaction, is perhaps most relevant in the US where ENGOs are recipients of multi-million dollar grants from a small community of foundations. Increasingly these foundations or their grant-managers are being asked to account for the basis on which they select organizations to fund. Unsurprisingly ENGO managers worry that if the impact of their organization is questioned foundational donors may review their grant-giving allegiances.

The fifth and main concern is the subject of the present paper. ENGO leaders are grappling with what the governance and accountability issues means for them and given the validity of their worries (above) it is relevant to ask whether academics should engage in the issue by discussing weaknesses in NGO governance and accountability and proposing constructive reforms? I believe that we should, but with caution and with due recognition to both the political nature of the topic and, as Elkington put it, *‘the real appetite in certain parts of the media for taking a major NGO apart’*.

I concur with [Goodin \(2003\)](#) that each of the main sectors of society – government, business, NGOs – is characterized by a distinctive accountability regime with different subjects and mechanisms of accountability. These different regimes can complement one another, enhancing the democratic accountability of the system overall, but they can also undercut one another, if their differences are not respected. [Brown and Moore \(2001\)](#) goes further to argue that different

accountability regimes are needed depending on the role of the NGO (e.g. service delivery or political advocacy) and how they structure their accountability will have ‘decisive impact on the strategies they execute’ (p. 585). In short a dynamic exists whereby organisational mission defines the accountability regime and the accountability regime shapes an organisation’s mission and strategy.

Thus, applying accountability regimes uncritically from the business or private-sector to the NGO sector could be the worst of all outcomes, but there is a risk that hard-pressed NGO managers will do just this. During the last two decades, ENGO managers have applied and adapted tools from the business and public sector to deal with the challenges posed by rapid growth in turnover, staff, global reach, membership and so-forth, and the temptation will be to do the same for the emerging governance and accountability issues. However, the way a sector defines accountability shapes its distinctive identity and role in society. Consequently, ENGOs must develop their own tools, processes and systems and convince the other sectors of their efficacy and merit. In short, the ENGO sector must design its own accountability regime. Ideally the pace of the governance and accountability debate needs slowing so as to provide time needed to develop and test the concepts and tools that together might create an accountability suited to major ENGOs in the 21st century. However, all debates move at their own pace.

4. Framing governance and accountability

The concepts of governance and accountability are inter-linked but also used in various ways. Within the current discussion, the term governance is generally used to mean how an organisation steers itself and the processes and structures that are used to achieve its goals (cf. [Edwards and Hulme, 1995](#)), not least because this is what TNC addressed following The Washington Post articles (above). Governance is about vision, oversight, process, independence and accountability and not the day-to-day running of operations.

A key purpose of governance is to ensure that an organisation’s assets are managed and developed in a manner that will maximise delivery on its mission. The key asset of ENGOs, and indeed the ‘third sector’ in general, is public trust. This point was emphasised in 2004 by charity leaders on both sides of the Atlantic. The UK’s chief charity commission, John Stoker, commented that the continued success of the contribution of charities to modern society is *‘dependent upon public trust and confidence in their work’* ([Charity Commission, 2004](#)). Similarly, in a lecture to the Bridgestar Community, Diana Avi, President of Independent Sector, a coalition of leading US charities and foundations stated that *“there’s just about nothing we [NGOs] can do if we don’t have the confidence not only of public officials... but also of donors, of the public at large, and certainly of the people we serve”* (Avi, 2004). In the UK, public trust in

charities exceeds that of parliament and trust in NGOs that of companies and political parties (MORI, 2003).

Trust and legitimacy are inter-linked concepts in the NGO sector. This is because public trust is a behaviour or attitude and according to Scott (1992) ‘legitimacy is the property of a situation or behaviour that is defined by a set of social norms as correct and appropriate’ (quoted in Dart, 2004). As I will go on to explore in greater depth, trust and legitimacy is generated by the belief that individual NGOs act in accordance with what the public perceives as the qualities and values that characterise the movement. These might include, being the voice of nature, independent, honest, idealistic, grounded and cost effective.

In a detailed analysis, Princen and Finger (1994, p. 36) argue that ‘NGOs gain influence by building assets based on legitimacy’. They seek to expand their legitimacy through, among other things: (a) stressing the cultural validity of the social values they espouse; (b) associating themselves with universal goals; (c) acquiring reputations for specialist or grounded knowledge; (d) representing important constituencies. These legitimacy assets create the political and social recognition for an organisation’s right to exist, to pursue particular agendas and press claims on others (Brown and Moore, 2001). The ‘package’ of legitimating assets required by any particular NGOs will vary depending on its role (e.g. policy advocacy, capacity building, service delivery) and geographic scope (e.g. international or local) and the ‘value’ of a particular legitimating asset will vary between different stakeholders.

The link between legitimacy and accountability is recognised by NGO leaders. Addressing a UK parliamentary meeting on accountability and stakeholder engagement (16 December 2004), Oxfam’s chief executive, Barbara Stocking, prefixed her remarks with the comment that ‘*the first question is what is your legitimacy*’. Several speakers in the Linacre lecture series similarly commented on the basis of their organisation’s legitimacy before moving on to discuss accountability. For example, Tony Juniper explained that central to FoE’s legitimacy is the ability to demonstrate: (a) that they live by the ideals through not accepting any money from the large corporations whose power they challenge; (b) that there is a real groundswell of people who want change, not just people who happen to be experts and can talk to politicians coherently; (c) that their governance structure makes leaders accountable to their membership. Graham Wynne, whilst commenting on the basis of the RSPB’s success, pointed to a combination of: (a) clear vision by the leadership, (b) grounded scientific knowledge, based on a combination of rigorous policy analysis and actually doing environmental work (e.g. managing reserves); (c) a massive membership with a 91% retention rate; (d) the huge volume of two-way communications (ca. 300,000 per year) between members and the organisation; (e) elected trustees; and (f) staying power—the ability to not go away and stick at issues for 15–20 year periods, as critical to the RSPB’s success.

The concept of legitimacy appears central to the debate on NGO governance and accountability. Legitimacy is a multifaceted concept and one that, as already inferred, operates differently in different contexts. Suchman (1995) synthesises definitions of legitimacy in the non-profit sector and propose a broad-based definition, namely “‘Legitimacy is a generalised perception or assumption that the actions of an entity are desirable, proper, or appropriate within the socially constructed system of norms, values and beliefs and definitions’ (p. 574)”. This definition expands on the crucial link between public trust, legitimacy and capacity for impact.

Fig. 1 is an attempt to draw together thinking on NGO legitimacy from development, anthropological and organisations theory perspectives into a simple model for considering the relationship between NGO governance, legitimacy and accountability. It is located within an institutional approach within organisations research that depicts legitimacy not as an operational resource (the strategic approach) but as a set of constitutive beliefs (see Suchman, 1995). Social anthropologist writing on the topic of NGO accountability such as Hilhorst (2003) and Lister (2003) adopt a similar view. In keeping with this tradition, the model (Fig. 1) posits that the fundamental assets of any NGO are socially constructed forms of legitimacy some of which are self-created by the NGO (e.g. its public profile and history of action) and some of which pertain to public and societal perceptions of the environmental movement. Accountability then becomes a process of legitimacy management and development and the structuring and oversight of these processes (the accountability regime) should be a key function of NGO governance.

An NGO’s legitimating assets in the public domain can be grouped under the terms ‘regulatory’, ‘pragmatic’ and ‘normative’ and ‘cognitive’ legitimacy. Normative and cognitive legitimacy reside primarily in the public sphere and create the social recognition and support for NGOs role and actions. Normative legitimacy describes the relationship with wider social and political ideologies concerning the role of charities, NGOs and civil society in the modern liberal democracy. Under this heading, legitimating assets include independence from the state, working for the benefit of third parties of third parties (e.g. species, the environment, disadvantaged people), working for the social good rather than profit (see Edwards, 2004) and also the location of an NGO within a sector that society has come to see as a important and worthy (e.g. the environment movement) (Suchman, 1995). The boundaries between normative and cognitive legitimacy are fuzzy, but the latter embraces mental models and maps of the NGOs and individual environmentalists, such as the belief that they are collectives of individuals who exhibit selfless and courageous dedication to a good and moral cause. Public trust in NGOs is in effect working as a brand where brand equity (value) is driven by the normative and cognitive action of ‘brand’ knowledge (=perception of cumulative

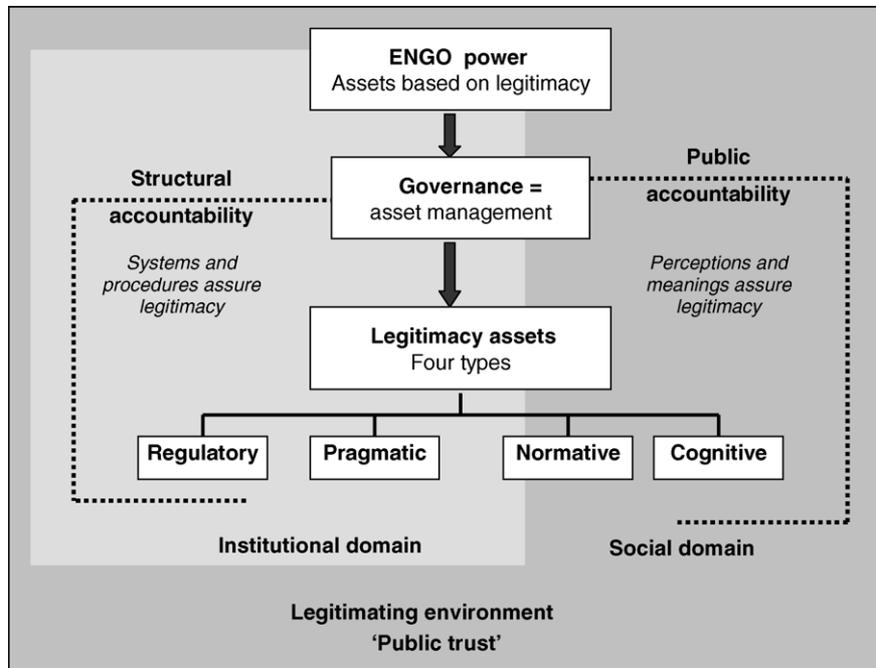


Fig. 1. A conceptual model linking ENGO governance, accountability and legitimacy (adapted from Lister, 2003).

evidence of ENGO legitimacy) (A. Nichols pers. commun.) (Table 2).

Normative and cognitive types of legitimating assets permeate institutions, but I suggest that in the institutional domain (comprising the relationships between organisations and between structural elements within an organisation) they may be subservient to regulatory and pragmatic types of legitimacy. The term ‘regulatory’ covers such things as the legitimacy an ENGO gains from complying with the law and the requirements of official bodies charged with regulating the sector, from supporting the implementation of conventions or official strategy (e.g. The Convention on Biological Diversity and Biodiversity Action Plans), and by adopting the professional and operating norms of major institutions. Pragmatic legitimacy rests on the self-interest calculations of an ENGO’s most immediate audiences (Suchman, 1995; Dart, 2004). If an ENGO provides powerful actors such as a

government agency, a corporation or a donor with something of value then it will be considered legitimate in their eyes.

I have adopted the terms ‘structural’ and ‘public’ accountability to describe the process and systems employed to assure these two paired types of legitimacy. These terms equate to Hilhorst’s (2003) categories of rational and moral accountability. In relation to development NGOs, Hilhorst stresses the need to distinguish between rational accountability and what she terms moral accountability. Rational accountability views organisations as structures in which responsibilities and authorities are clearly defined and ordered and accountability is the means by which individuals and organisations report to a recognised authority and are held responsible for their actions (sensu Edwards and Hulme, above). Moral accountability is akin to what Najam (1996) terms internal accountability and is about an NGO’s responsibility to its mission, values, staff and, in my

Table 2
Categories of legitimacy in the ENGO sector and examples of legitimating assets

	Legitimacy category			
	Regulatory	Pragmatic	Normative	Cognitive
Descriptor	Proper	Real-world	Rightness	Taken-for-granted
Basis	Based on law, conforming to legal requirements	Based on self-interest, value production, demands of the market-place	Based on evaluation, conforming to ideals	Based on cognition, conforming to models
Legitimating assets	Abide by law, duly constituted, properly managed and organised, mandated by conventions, policy frameworks, etc.	Economic clout, lobbying-networks, professional expertise, history of engagement, organisational realities, benefits of ‘brand alignment’	Activities benefit others, independent actor, grounded knowledge, public constituencies, wise stewardship of resources; effective and efficient delivery of activities	Self-sacrifice, defenders of values, moral ideals, honesty, challenge power & the status quo, watch-dog

view, to the social values and public constituencies that it was formed to advocate and represent.

As yet, public accountability (managing normative and cognitive assets) has little operational meaning beyond making reporting more transparent and accessible (see, for example, [Charity Commission, 2004](#)). Rectifying this situation represents an important and urgent challenge for ENGO leaders and scholars alike, not least because this may be the most productive area from which to develop a distinct ENGO accountability regime. This is because ultimately trust and accountability go hand in hand, especially in more sceptical and better-informed society. If the basis of public trust is eroded, then the assets upon which an ENGO builds the capacity to deliver on its mission risk being weakened or destroyed.

An every day understanding of accountability might be ‘telling people what you’ve done’. The UK Charity Commission views it as ‘a charity’s response to the legitimate information needs of its stakeholders’ ([Charity Commission, 2004](#)). This has similarities with [Brown and Moore’s \(2001\)](#) view of NGO accountability as a relationship between two or more parties where one is accountable to the other for the execution of some duty promised. For example from this perspective an ENGO is accountable to a donors for execution of a project according to agreed outputs and indicators, to policy committees for the quality of their scientific inputs, to staffs and memberships for continued focus on the cause that drew them to the organisation.

Under this view of accountability ENGOs might tactically or unwittingly gear their accountability structures to suit powerful stakeholders (donors, governmental partners) whilst ignoring their accountability to stakeholders, such as memberships, who lack the desire or capacity to press their claims. The result could be skewed accountability regimes that emphasise management of regulatory and pragmatic legitimacy but over-look the management of forms of normative and cognitive legitimacy that might be central to an ENGOs supporter base and capacity to act. For this reason, I prefer a model of accountability that seeks to explicitly identify and define what it is that legitimates an ENGOs role (or range of roles) and then develops systems and processes to monitor, assure and develop those legitimating assets that are vital to the ENGOs impact and success. By adopting this approach ENGOs may be better placed to craft accountability regimes with clear linkages to their mission and strategy and this may provide valuable guidance on the structure and function of their governance.

In summary, accountability (maintaining trust) might be viewed as a primary goal, rather than a single element, of ENGO governance (sensu [Leat, 2004](#)). Moreover, those who govern ENGOs should ideally be mindful of how their organisational decisions might impact on the sector as a whole. They should be equally concerned about maintaining the fragile public sphere and its role as a balance and check on the power structure (see [Bovens, 1998](#)).

5. Moving ahead on governance and accountability: ENGO initiatives and future challenges

ENGOs that have transformed to become major organisations need to embrace the recognition that by becoming big many social actors will no longer accept as read their legitimacy, worthiness and effectiveness. Moreover, now that they have become part of the power structure, they themselves will become the targets of political activists within the broader environmental movement, particularly those concerned with minority rights. A recent example of this type of challenge is the stinging report by the World Watch Institute that constructs WWF, The Nature Conservancy and Conservation International as oppressors of indigenous peoples ([Chapin, 2004](#)).

Some major US-conservation donors are asking ENGOs how they know that their contributions will provide lasting protection for habitats and species ([Christensen, 2003](#)). The multi-million dollar contributions of these donors have been instrumental in building pragmatic legitimating assets for the ENGOs concerned (financial clout, expanded organisational reach, etc.). In his lecture, Sanderson described how in response to these calls, WSC has joined forces with four other large American conservation NGOs to form the Conservation Measures Partnership (CMP), coordinated by a non-profit consultancy, Foundations of Success. His vision is an independent body, created but not governed by conservation organisations, which will develop learning portfolios and attest to the quality and impact of conservation programme through the application of principles and criteria (see <http://www.conservationmeasures.org>).

In essence the CMP is a form of professional association designed to improve staff performance through a combination of adopting common concepts and terminology, sharing lessons learning and setting standards or project design, management and execution. The open standards are conceived as a mechanism for auditing the process of conservation and measuring conservation impact. These two elements create a structure whereby the ENGOs involved can account to major donors that they are executing conservation project in a professional manner. This is consistent with the principal-actor concept of accountability ([Brown and Moore, 2001](#)) where one actor (the ENGO) accepts a moral and legal responsibility to do its best to fulfil a promise and accountability takes the form of a contractual relationship between the donor principal and ENGO actor.

The CMP accountability structure is located within the institutional domain: it is designed and audited by executives following careers at the interface of ENGOs, major donors and governmental bodies. It may be powerful at managing and developing forms of pragmatic legitimacy, but it could pose risks to forms of normative and cognitive legitimacy, particularly if the ENGOs concerned have a policy advocacy role. The risk is that if an ENGO positions itself as accountable to a private donor then some may construe it as a

vehicle for advocating the agendas and worldviews of an elite minority. In this regard, Juniper noted that for FoE, it is crucial that their local groups are out and about campaigning because in political and policy domains it is this that enables them to counter the charges the ENGOs espouse the values and policies of an unrepresentative management elite.

Various other frameworks and initiatives are emerging that aim to help organisations, including ENGOs, become more accountable in their operations. Two of the more prominent are the accountability framework developed by the Global Accountability Project (GAP) of the One WorldTrust (Kovach et al., 2003) and the AA1000 accountability standard developed by the non-profit professional institute, AccountAbility. WWF-UK is engaged with both these frameworks. It agreed to be evaluated by GAP on the basis that it might offer guidance on what WWF-UK might do and because being bench-marked in this way would wake up the wider WWF-network to the issue (Niall Watson, pers. commun.). In his lecture, Napier noted that WWF's poor-ranking had been a '*wake up call... and spur for action*'.

Whilst both the One World Trust and AccountAbility frameworks include useful accountability metrics for NGOs they may not provide the conceptual under-pinnings necessary for a distinct and effective ENGO accountability regime. The One World Trust framework is a rights-based approach to accountability that aims to enable weaker players to have redress over power by holding it to account. It is based on the premise that "*any group or individuals who can affect or is affected by ... an organisation*" have a right to hold an organisation to account (Freeman, 1984, quoted in Kovach). Promoting democratic accountability is an important goal but it is not the central accountability issue for ENGOs, many of which do not pretend to be democratic in their constitution. The AccountAbility standard is located within a managerial school of institutional thinking, consolidated around the Global Reporting Initiative, which argues that governments, businesses, investors and communities need timely, credible and consistent information on the economic, environmental and social performance of an organisation in order to address effectively the challenges associated with building sustainable societies (GRI, 2002). The AA1000 assurance standard is a generally applicable standard for assessing, attesting to and strengthening the credibility and quality of an organisation's sustainability reporting (AccountAbility, 1999). As such it is firmly located within the category of structural accountability described above and is not designed to meet the challenges associated with public accountability that are central to the ENGO governance and accountability debate.

Whilst it is generally accepted that citizens desire redress over governmental bodies and trans-nationals that act against the public interest, I am aware of no evidence that the public at large wishes to hold NGOs to account. For example, a survey of attitudes of 22 US individual donors to performance measurement in NGOs found that either they

did not care or were hostile to the notion (Cunningham and Ricks, 2004). Indeed, most citizens might have a deep-seated need to believe in NGOs because to do otherwise would dismantle the civil structures through which citizens can abrogate their feelings of moral concern and responsibility for issues that are beyond their direct sphere of influence.

In my view, a pressing challenge for ENGOs is to develop accountability regimes that manage forms of normative and cognitive legitimacy. A means of doing this might be to first examine honestly and openly what legitimates their agenda, their role and the strategy and tactics they adopt. Then to analyse each legitimating asset in terms of its value to different stakeholder groups or target adopters, and the obligations that attached to each type of legitimacy. These two steps would help ENGOs address the key questions of 'for what?', 'to whom?', and 'how?' they should be accountable.

The third step would be to conduct a review of organisation practices that could either contribute to a legitimacy-based accountability regime or that might undermine certain types of legitimacy. An example of the former is the fact that the RSPB has a membership services department that responds to an average 300,000 questions per year. Whilst the majority relate to questions about birds many concern more substantive issues and this level of communication helps build a sense of openness and responsiveness between the executive and membership. An example of the latter practice is the widespread practice of 'cherry-picking', i.e. communicating successes from a portfolio of projects and ignoring the problems and failures. Apart from contravening one of Zadek's (1998) principles of social accountability, such messaging reinforces forms of cognitive legitimacy relating to ENGO capacity to deliver and make a difference but could raise public expectations of ENGOs to unrealistic levels. The risk then is that if the true levels of impact and failure are revealed and people's mental maps of ENGO as high attainers are shown to be lacking then this may lead the public to become pessimist, disillusioned and/or cynical about the purpose and function of ENGOs. In short, any suggestions that ENGOs are living a lie would directly impact on normative and cognitive legitimacy with potentially irreparable damage to the environmental movement. Despite this risk I am unaware of accountability structures that promote governance oversight of ENGO publicity, marketing and fund-raising campaigns.

A fourth step would be to develop and test new measures that would strengthen public accountability and thereby assure and strengthen legitimating assets based on public perceptions. Such perceptions are created by the combination of people's participation, education, the degree of information and the way issues are articulated and communicated. In short, the discursive character of the environmental movement. The proposition is that legitimating assets founded on the belief that ENGOS represent

grass-root opinion, defend moral values and/or benefit others will be strengthened if these opinions emerge from processes of on-going debate and discussion in the public domain. In this sense, accountability is a social process of sense-making that derives from actors discussing alternative accounts (Hilhorst, 2003).

The CPRE is moving towards this position. In a progressive move (for ENGOs) it has de-linked editorial control of its membership magazine from the executive. The magazine now publishes opposing views from prominent members on topical issues (e.g. wind farms, see *Countryside Voice*, Autumn, 2004) and encourages its readership to debate the issues. This creates a powerful accountability stream within the CPRE, because it creates a need for board members and senior executives to listen and respond to the views of grass-root constituencies, which in turn challenges them to view the membership as it perceives itself rather than as constructed through the lens of organisational development.

Taking this thinking a step further, one option would be for ENGOs to employ discourse tools ('topics to talk about') as a means to engage their stakeholders (constituencies, partner organisations, beneficiaries) in active discussion on the state of the environment movement. Practical examples might include presenting for discussion: (a) alternative views on contemporary issues; (b) independent assessments on topics such as ENGO financing, risk and failure rates of conservation projects, and public support for conservation; (c) reflective accounts placing current ENGO strategy and policy in its historical and wider cultural context.

Promoting debates whose outcomes cannot be controlled might be an effective means of strengthening ENGO accountability and legitimacy. It would strengthen the sectors' claim to be representatives and advocates of an independent sphere of values and beliefs located between the state, corporations and organised religions. It would give voice to new and different perspectives and would enable private citizens to emerge as opinion-makers able to call career-environmentalists to account and counter-act sensationalist and/or damaging attacks on ENGOs from the media. Finally, re-energising environmentalism as a sphere of active and impassioned public debate might attract young adults back to the movement's ranks and restore the dimension of cognitive legitimacy relating to youth, idealism and struggle.

6. Conclusion

As ENGOs become big they are more likely to be perceived as being part of the power structure that many citizens (especially traditional supporters of ENGOs) distrust. The challenge for big ENGOs is to demonstrate to their public constituencies and society at large that they have not sold out. In order to do this, ENGOs need to develop an accountability regime that is distinct from, yet

acceptable to, other sectors of society. It is suggested here that the key to this accountability regime lies not in the adoption of structural processes such as audit trails or the reporting of performance measurements, but in the engagement of public constituencies in informed discussion on values, issues and strategy. This is because all ENGOs are rooted in, and claim their legitimacy from, social movements that since the 19th century have sought to develop and maintaining (sometimes impose) values in society concerning the human–nature relationship (Jepson and Canney, 2001). Ultimately the governing boards of ENGOs must account to society for the continued relevance, integrity and impact of the environment and conservation movement, which legitimates ENGO engagement in the shaping of policy and delivery of services.

In this article I have argued that ENGOs need to develop and define an accountability regime that strengthens and reasserts their distinctive contribution to society. I have proposed a legitimacy-based approach in support of this endeavour, but have also drawn attention to alternative rights- and standard-based approaches that are becoming established. Whilst these approaches have many merits, I am of the view that the ENGO sector needs to develop an accountability regime that is aligned to its historic roots and successes, yet prepares leading ENGOs for the challenges of the 21st century market-place. In order to develop such an accountability regime it is necessary to debate the merits of different approaches, trial and evaluate novel accountability mechanisms, and engage more fully the public constituencies of ENGOs in this discussion.

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