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Judith MARQUAND
University of Oxford (England)

HAS RUSSIA AN ENVIRONMENTAL POLICY? THE CASE OF THE TOMSK REGIONAL ECOLOGICAL COMMITTEE

1. Introduction

There is no doubt that Russia has domestic environmental legislation. It has also signed various international agreements like the Basle Convention and the Kyoto Agreement. Thus, on paper, it certainly has a framework for an environmental policy. But does it have the knowledge or the will to implement it? (Its will has certainly been brought into question by opportunistic behaviour like the recent cynical use of environmental policy to obstruct the Sakhalin oil contract.)

This paper looks at environmental policy and its implementation through the prism of the Tomsk Region, where I worked with the Tomsk Regional Ecological Committee (TREC) for some years in the 1990s. My most recent visit to them was at the end of 2005. From that experience, I think I can draw some more general lessons.

The main part of the paper concerns the period from 1989 to 2000, with a briefer discussion of what has happened since:

– he state of the environment, institutional arrangements and legal position in the 1990s,
– how TREC actually carried out its responsibilities in the mid-1990s,
– what it was doing by 2000,
– what Putin did to the Ecological Committees,
– what, none the less, happened in Tomsk; where TREC stood at the end of 2005,
– conclusions.

2. The environment, institutions and legislation in the 1990s

It is well-known that Soviet policies towards the environment were disastrous. The environment did not enter into the arcane Soviet systems of accounting. Nature was simply there to be exploited. The facts that its services were limited and that misuse of them could damage human health were factors which were, literally, of no account at an official level until the time of *perestroika*.

In 1989, a system of ecological committees was set up. At the centre was the State Committee for Environmental Protection. In each region, there was a Regional Ecological Committee reporting to it. When the Soviet Union collapsed, an all-Russian State Committee for Environmental Protection was retained, along with its 89 Russian Regional Committees. The condition of the environment at this time was little short of catastrophic. An argument often heard in the Soviet Union, or Russia, or Siberia in particular, was that there was so much space and such an abundance of natural resources in relation to the population that most of the human impacts on the environment were unimportant. This was simply wrong, as is shown clearly by the OECD "Environmental Performance Review" for the Russian Federation [*Environmental Performance...*, 1999].

The OECD document "establishe[d] a baseline for assessing future environmental progress" [*Environmental Performance...*, 1999, 19] and demonstrated that every aspect of the environment was in an unsatisfactory condition. For example:

– **Air quality:** "during the first half of the 1990s, the *Maximum Allowable Concentrations* (MACs) measured over a year for the most important pollutants together was exceeded in 204 cities, or for 62% of the Russian population; long-term critical values were exceeded in 43 cities" [*Environmental Performance...*,1999, 57].

– **Surface water:** "all the main rivers ... are classified as "polluted" and their main tributaries (*e.g.* the Oka, Kama., Tom, Irtish, Tobol, Miass) as "heavily polluted" [*Environmental Performance...*, 1999, 74].

– **Drinking water:** (mainly taken from surface water) "about 70% of rivers and lakes *cannot be used for drinking water supply without treatment*...Because of the pollution of water resources, inadequate water treatment ...and the degraded state of water supply systems...about *half the population consumes water which does not meet some standards* "[*Environmental Performance...*, 1999, 75]. In a wide range of cities, various water-borne intestinal infections were reported during the 1990s. Only 10.8% of waste water was treated to the required standards.

– **Industrial hazardous waste:** one third of this was generated in Siberia (and one-third in the Urals). The main source of the most hazardous category

(78%) was the petro-chemical industry. The amounts of hazardous waste recovered were negligible. Municipal solid waste: did not present any particular problem. Its composition was much like that in middle to high income countries. But "sewage sludge lagoons occupy a significant amount of land in major urban centres" and its use for soil conditioning was often restricted by a high content of metals. Also, there were few facilities for dealing with biomedical waste. Some of it was sent to municipal landfills [*Environmental Performance...*, 1999, 90–92].

– **Radio-active waste:** "significant volumes of both high and low-level radioactive material in the form of liquid and solid waste, spent fuel and contaminated equipment are stored at *military and research facilities*.... Two inland military reprocessing sites (Tomsk and Chelyabinsk) are highly contaminated due to industrial accidents and bad practices" [*Environmental Performance...*, 1999, 93].

– **Protected areas:** covered 5.5% of the surface of Russia in 1996. There is a Red Book of endangered species. The best-known of these are the sturgeon and the Amur tiger.

Soil: "Very little agricultural land with undamaged soil cover remains...Humus content of soil is declining steadily throughout Russia...*Industrial emissions* have ... resulted in local soil contamination by heavy metals" [*Environmental Performance...*, 1999, 110–111].

Forestry: the regulations "permit unsustainable forestry practices and do not take biodiversity into account" [*Environmental Performance...*, 1999, 111]. The boundaries prescribed for cutting have been extended into areas which are supposed to be under special protection, and illegal logging is rife.

– **Inland fisheries:** the "harvest is declining due to over-fishing, discharge of urban and industrial effluents into numerous lakes and rivers, construction of dams and reservoirs (eg on the Volga and Ob rivers), diversion of water for irrigation... and increased salinity" [*Environmental Performance...*, 1999, 111].

– **Carbon emissions:** "despite sharp reductions in CO_2 emissions, Russia remains the world's third largest emitter of CO_2 from energy. ...Energy efficiency is fairly low and cost savings could be achieved through its improvement... As the Russian economy's carbon intensity is particularly high, there is great potential for *energy efficiency improvements*" [*Environmental Performance...*, 1999, 33].

During the 1990s, industrial production fell by more than half. This reduced the industry-related pressures on the environment – but by a much smaller factor. The amount of pollution and energy consumed per unit of output continued to rise. This sorry performance was not for want of basic legislation. The fundamental Law on Environmental Protection was passed in 1991 and came into force in 1993. In its first clause it states that the task of environmental

protection is "to regulate the interaction between society and nature, in order to preserve the natural wealth and natural surroundings of human habitation, prevent ecologically harmful effects of economic and other activities, improve the healthiness and quality of the environment and strengthen law and order in the interests of present and future generations".

Furthermore, the law specifies: the citizen's right to a healthy and safe environment, the citizen's right to form environmental associations, to obtain information and to seek legal redress for environmental damage, environmental responsibilities of the federal and other governmental levels, environmental obligations of enterprises, the State Ecological Examination system, environmental liability and the environmental funds system [*Environmental Performance...*, 1999, 45].

Also, the Russian Constitution (1993) states that "the land and other natural resources are used and protected in the Russian Federation as the basis of the life and activity of the population inhabiting the corresponding territory" [*Environmental Performance...*, 1999, 45]. During the 1990s, this legislation was complemented by a whole series of more specific laws, gradually replacing the former, Soviet legislation. New laws covered air, land, water, natural resources and wildlife, waste management and protection from radiation. Provision was made for a uniform system of environmental monitoring and for the system of State Ecological Examination. The legal basis was provided for measures to implement the Basle Convention on hazardous wastes etc. But the environmental protection section of the 1993 Ministry of Environmental Protection and Natural Resources of the Russian Federation was downgraded in 1996 to the status of a State Committee on Environmental Protection, whilst natural resources, including water, remained within the Ministry of Natural Resources. So the problems of improving the Russian environment are problems of implementation, not of legal powers.

The 89 Regional Ecological Committees were the main mechanisms for implementing these environmental laws. The Tomsk Regional Ecological Committee (TREC) was, of course, among them. It was founded in 1988, earlier than the Federal Committee.

3. How TREC carried out its responsibilities in the mid-1990s

All types of environmental problems are manifest in the Tomsk Region itself. The Tomsk Region is a bit larger than Poland, but it only had just over 1 million inhabitants in 2002. Three quarters of these are clustered around Tomsk in the south. Most of the other settlements are strung out along the River Ob, flowing north. The region is in the taiga, with forests and bogs. The northern peat bogs extend towards the Urengoy gas field – the largest in Russia. There

is also oil. The wetlands themselves include the largest one in the world – the great Vasyugan bog. The permafrost below is starting to melt at an alarming rate. [Kirpotin et al., 2007] The extent of Nature Protection areas is very small. There are problems of air pollution in Tomsk City, water pollution in the Rivers Tom and Ob and some of the Tom's tributaries, problems of oil pollution around the oilfields and pipelines, problems of heavy metal pollution and acid soil in and around Tomsk itself from former petro-chemical and related industries and radiation problems mainly (but not entirely) from the nuclear installations in Seversk. There is a continuing worry about the safety of the underground storage of enormous quantities of nuclear waste.

What were the institutions dealing with all this? The main one was the Tomsk Regional Ecological Committee. In the 1990s, it had more than 100 employees of whom nearly 70 were based in Tomsk City itself. Its head office was a tall brick office block next to the old KGB headquarters. As well as the staff at Regional Headquarters, TREC had staff in 19 District Offices distributed throughout the region. (There was also a Tomsk Municipal Ecological Committee, but that reported to the Municipal Administration and was a different organisation altogether.)

I finally managed to get funding from the UK Department for International Development (DfID) to work with TREC in 1998–9 on its organisational development. The key members of the Ecological Committee were then:

– Dr. (later Professor) Alexander Adam, the Chairman. He was a charming, charismatic, dominating and sometimes infuriating man, who combined the chairmanship of the Ecological Committee with a Deputy-Governorship (an official, not an elected post) in the Tomsk Regional Administration, where he was responsible for Natural Resources, as well as the headship of the Ecological Management department at Tomsk State University. He spent most of his time on his regional administration work, so that much of the Ecological Committee business was in fact managed by:

– his First Deputy, Valery Kubrin. Valery Kubrin was a sincere, likeable, conscientious man, who was responsible for our project.

– Dr. Adam's Second Deputy, Alexander Griznoff, was responsible for strategic rather than day-to-day questions.

Our project administrator in Tomsk was Valentina Galzova, the senior member of staff in the Ecological Committee responsible for education and information. Was she, or was she not, a Deputy Director? Neither she nor we were ever quite clear about this.

TREC had close working relations with a huge range of other official bodies. For example, the Governor of the Tomsk Region had created the Co-ordinating Council for the Environment in 1995. It had 19 members representing 18 different bodies and was chaired by Dr. Adam (presumably in his capacity as Regional Administrator rather than as Chair of the Ecological Committee). It

was a standing committee with wide-ranging responsiblities and powers. Of course, much of the Ecological Committee's work involved dealing directly with firms, educational bodies, the press, and the general public. But the internal structure of the Committee was seriously dysfunctional.

TREC, interpreting the State Environmental Protection Law, had a clear mission, "to establish the optimum regime for the mutual benefit of nature and society", spelt out in three "level 1 subgoals" and 12 "level 2 subgoals". These corresponded to the activities of different departments of the Committee. This conceptual structure was set out in a diagram. But when we looked more closely at this and at what purported to be the corresponding organisation chart, we found a less satisfactory situation. Set out in conventional Western form, the organisational structure showed 10 departments reporting to Valery Kubrin (no wonder he often seemed harassed!). There were just two indications of delegation below this: Valentina Galzova, whilst directly responsible for information and education, also had responsibility for the IT department and the Monitoring sub-department. The biggest, most complex department was the Inspectorate, where the Chief Inspector was responsible for a team of inspectors subdivided according to environmental category, not according to polluter. In addition, he was responsible for the 19 District Committees.

Not only was the organisation structure literally unmanageable; there was little horizontal communication between departments. The heads of departments met in Valery Kubrin's office every Monday afternoon; the meetings usually only lasted for about 30 minutes. I attended one of these meetings. 23 people were present. First, people gave accounts of their business trips during the past week – for example about problems regarding fishing and about toxic run-off from oil wells. Some people read what were obviously carefully prepared accounts. Dr. Adam reported some negotiations with companies about materials for building projects.The Head of the Radiation Control Laboratory had been to Moscow and raised some problems about relations with Krasnoyarsk. No report lasted more than two or three minutes.

Dr. Adam was assertive on occasion. For example, the Chief Inspector had been irritated by the problems of negotiating with some people from Kemerovo. Dr. Adam pointed out strongly that, although you might not respect them as people, you had to respect their positions. Dr. Adam responded to each report. Only occasionally did anyone else intervene in the resulting dialogue.

Below the level of departmental heads, apart from special working groups, there was virtually no cross-departmental contact apart from that which was formally required – for example, the Inspectorate would ask the analytical laboratory to analyse samples and the laboratory would then report back the results. Departments with frequent dealings with each other were haphazardly scattered over the building.

There were two separate budgets for the Committee – the state contribution to cover salaries, managed at clerical level by the Financial Accounting Department, and the revenue from the Ecological Fund, managed by the Economics Department. But no one ever considered the two budgets jointly. There was no devolved budgeting; department heads had to submit bids *ad hoc* for items they needed. There was no personnel policy at all. Dr. Adam made all final decisions on personnel matters.

Three of the Committee's functions deserve a fuller account: the Ecological Fund, Environmental Audit, and strategic planning.

The Ecological Fund

Ecological Funds raised from charges on firms were the financial instruments most commonly chosen for environmental protection in the transition countries [*Environmental Funds in...*, 1995]. Analogous funds are found in a few places elsewhere. Their (Western) rationale is rooted in the polluter pays principle. In Russia, it is not clear that they were regarded as anything other than a means of raising revenue for environmental purposes. The Russian Ecological Fund was set up in 1990. The 1991 framework Environmental Protection Law established its legal basis for the period of our project [Averchenko et al., 1995]. The fund was used for [Averchenko et al., 1995, 65]:

– the upkeep and functioning of equipment for combating pollution and other means of protecting the environment,

– capital investment for the reduction and combating of pollution, for environmental protection and nature conservation,

– management of protected zones (reserves, national parks, etc.),

– management of forests,

– public environmental bodies and agencies,

– research and development, training and education and other activities linked to environmental matters.

Of the revenue that was to be collected, 10% was allocated to the state budget. Of the remainder, 10% went to the national fund, 30% to regional funds and 60% to local funds. We were told by the Tomsk Ecological Committee that, no matter what amount had been collected, the first call on the revenue was that 10% of the estimated revenue had to be sent to the Ministry in Moscow. The rest was spent on various Ecological Committee projects and on payments to firms to install environmental protection equipment. We were told that about 70% of the revenue in Tomsk went on payments to firms.

These estimates of revenue were made by the Economics Department, using federal standards which set the rates per ton for different kinds of waste. To estimate these quantities, the Economics Department used the emissions for each individual firm as set by the Inspection Department in accordance

with state regulations. The charge set for each firm depended not only on the estimated quantity and composition of its emissions, as licensed by the Department of Expertise, but also on whether it had a contract with the inspectors. If it had a contract and exceeded its permitted emissions, it was fined 5 times the normal charge; if it had no contract then it was fined 25 times the normal charge. Moreover, if it installed an environmental protection system of its own, a rebate on the (normal) charge was given.

The Ecological Committee thus had strong motivation to collect the revenue due to it, but this conflicted with any professional motivation for inspectors to encourage firms to install environmental protection equipment. Indeed, the inspectors interpreted their role purely as one of ensuring compliance; there was no attempt at persuading or advising firms how to reduce their emissions. Moreover, environmental protection equipment appeared to be envisaged only as end-of-pipe; the national emission standards were estimated on the basis of outputs of different kinds, not processes, so that a firm which installed a totally new, less polluting process would not see any decrease in its standard rate of charge. So the collection of money from firms was of prime importance to the Ecological Committee. Not surprisingly, it liked to target the big polluters. We were told that firms which paid up promptly did better in receiving subsidies. When firms refused to pay, the case was sent to the Public Prosecutor. The head of the TREC Legal Department represented the Ecological Committee in court. We asked her what happened then. She simply said "they pay".

While the collection process for the Ecological Fund was clear, the disbursement process was rather obscure. There was an Ecological Committee for the Management of the Fund, chaired by Dr. Adam. It met every week and decided what expenditures should be made from the Ecological Fund, according to an estimated budget for the year made by the TREC Economics Department and approved by the Regional Duma. The Committee itself decided which, from an environmental point of view, were the priority problems to solve.

Environmental Audit

The development of environmental auditing was one of the functions of the Department of Ecological Expertise, the Department which licensed companies. Companies were required to produce environmental impact assessments, including impacts on people, settlements and nature. But, as the Head of the Department explained, "As the department is part of a state organisation which has only existed since 1990, we don't have full documentation. We have the all-Russian documentation, but some of the local regulations are only in the local [Tomsk] Duma. Some of them still have to be ratified. Until then, we have discretion to design our own procedures. This is our joy and our grief! We can go our own way, but we need good lawyers" [Marquand, 1998]. Companies

which were refused licences often appealed – and the Head of Department told me that he had been physically threatened on occasion.

Those local regulations which had been ratified included a Tomsk law on Environmental Audit, which he had prepared. It was the first in Russia. The problems of implementing it were acute. Dr. Adam emphasised that it was important to develop support services for its implementation.

Strategic Planning

Something did exist which the Ecological Committee regarded as strategic planning. It took place once every two years. Each Department put forward proposals which were discussed within the Ecological Committee. They were then discussed with the Natural Resources Department in the Regional Administration, to decide which work could be done by the Committee under its existing powers and which needed legislation. After decisions had been taken at this meeting, the necessary legislation was drafted. Indeed, it seemed that the main operational function of the strategic planning process was to decide what problems needed legislation and hence what should be included in the legislative programme. The priority problems were indeed the foundation of the plan, but it only led to legislation, not to implementation. There appeared to be no discussion of any associated changes in the allocation of staff resources, nor commitment of funds to particular proposals.

4. How the Tomsk Ecological Committee was operating by the beginning of 2000

So we had a formidable task within our project to turn the Ecological Committee into a body which knew not only what it wanted to do, but how to do it and how to organise itself to carry out its plans. Because the staff were well-educated professionals, committed to a clear mission and with the need to make the best use of very limited resources in order to achieve it, they were willing and able to learn very fast.

There were three main strands in the project:

– work with department and some section heads on organisational behaviour and, in particular, on strategic planning and its consequences for the organisation's structure,

– work on environmental audit,

– work by the Environment Agency on integrated prevention and control of pollution.

Two of us held a series of middle management workshops on topics like evaluation, delegation and strategic planning. A newly-formed strategic plan-

ning committee produced a plan by the middle of 1999. My final report to DfID commented that "the basic concepts of strategic thinking appear to have taken root." In particular, the plan recommended a new structure for the Committee. This had four main functional blocks reporting to top management: the Inspectorate, the Expertise and Economic block, the Information Analysis block and Management Services. Dr. Adam implemented this recommendation in full. Also, the position of the different departments within the building was reorganised to bring the blocks together.

Two of the project team developed an implementation plan for setting up an effective environmental auditing framework in the Tomsk region. They taught a group of staff about environmental management systems and how to carry out environmental audits. The work was intensely practical; it involved environmental managers from firms. (There were in fact already a few such managers in Tomsk.) The group of trainees worked most closely with one firm, Tomsk Pivo (Tomsk Beer). The following year, it won an award as the environmentally-cleanest firm in the whole of Russia. The group of trainees, some from the Ecological Committee and some from firms in Tomsk, sat the EARA (Environmental Auditors Registration Association) part 1 examination early in 1999. All passed with a mark of "Excellent" – a much better result than you would expect from a similar group in the UK. The foundations were laid for an accreditation system in the Tomsk Region for environmental auditors.

The leading Environment Agency representative spent many hours one-to-one with Dr. Adam persuading him of the merits of integrated prevention and control of pollution and of the need to persuade firms that reducing the emissions of pollutants was often a win-win strategy. The Environment Agency gave several workshops in Tomsk on implementing integrated control of pollution, even launching the use of a very sophisticated method (the 3Es system: Environment, Efficiency and Economy) with one firm, Tomsk Instruments. They hosted an extremely successful 3-week visit to England, based in their Leeds office, for 6 key members of the Ecological Committee. The whole approach of the Tomsk Ecological Inspectorate was turned around from policing and punishing its firms to working constructively with them to improve their environmental performance.

I went back to the Ecological Committee early in 2000, a few months after the project ended. All the main participants gave heart-warming accounts of the difference which the project had made. Dr. Adam gave an account of the most dramatic change of all. Yukos was based in Tomsk. TREC used to put pressure on them to change their tactics. But in 1999 it was TREC that changed its tactics. Dr. Adam took part in a meeting chaired by the First Deputy Head of the company and persuaded Yukos of the economic benefits to them of cleaner operation.

After this meeting, our business relations were improved. The company was inspired to take up all the ecological methods, environmental methods, to protect the environment very actively. They settled their debts to the Ecological Fund and began to allocate enough money to restore the soil, for different activities, such as to eliminate *schlam* (toxic mining discharges). Now, we have a mutual programme together with this organization to improve the competence of their employees and to give a second environmental education to the Yukos specialists. I am talking about the specialists who are involved in the work of the firm in the whole Siberian region. We are preparing a group of teachers to go to Nefti Yugansk to teach there...

During the summer of 1999, the Department of the Environment advisor to the Know How Fund, impressed by the reports of the progress of the project, made a visit to Tomsk. He so liked what he saw that the Know How Fund decided to place a £2 million three-year successor project in Tomsk to continue the work with TREC. The project was commissioned to a big consulting firm.

5. What Putin did

Then, in May 2000, the new President, Putin, advised that environmental protection was an unnecessary luxury, abolished the Ecological Committees and transferred their functions to the regional branches of the Federal Ministry of Natural Resources.

6. What, none the less, has happened in Tomsk

The start of the big DfID successor project was delayed by all the uncertainties, but ultimately the contract was signed and the consultants worked with the Committee for 3 years on further institutional development, strengthening environmental regulatory systems, developing financial incentives for enterprises to reduce pollution, promoting public participation in environmental decision-making and disseminating the results.

But this is not the end of the story. I interviewed some of the members of the former Ecological Committee again at the end of 2005. By then, Mikhail Khodorkovsky, the founder and head of Yukos, had been imprisoned and its main assets had been sold to the state-owned firm Rosneft. There had been major changes for the Ecological Committee members too. The new organisation of regional agencies remained in place within the Federal Ministry of Natural Resources until 2004, but it was always known that this would only be provisional.

Then, in 2004, a restructuring separated the management of state resources from the monitoring and control of activities. There were several parts to the

system: water management was divided according to river basin, but other state resources were managed regionally. A few of the old Ecological Committee now worked in the management section of the Ministry of Natural Resources for the Tomsk Region. The impression that I gained from them was that it operated very much as a traditional part of the Russian bureaucracy.

The majority of the old Committee had remained with Dr. Adam (now Professor Adam), who became the head of Tomsk Region's Department of Natural Resources and Nature Preservation, which was the "environmental control" part of the federal service at regional level. In 2006, there was a further change. The main responsibilities of the Nature and Environment Protection Service were transferred from federal to regional level. As Professor Adam said, "Something analogous to the old Ecological Committee will be created, but belonging to the Oblast, not the federation. This system will be applied throughout Russia."[1] *Plus ca change, plus c'est la meme chose!*

The Tomsk Region was still the pilot territory for changes. The President's administration had nominated it as the pilot region for this further re-structuring. It was also a pilot region for compiling and publishing indicators of sustainable development. This had grown out of the work of one of its members, who had published a volume of such indicators for the Tomsk Region in 2003 and again in 2004. It had been intended that theVoronezh Region would also pilot such indicators, but their efforts had failed. When I asked why, he said simply that in the Tomsk Region, they had had several projects for some years. There had been fewer in other regions. "Here in Tomsk, we try to do things, not just talk".[2]

Another area in which Tomsk was a pilot region was that of Environmental Audit. Building on the work our project had started and the successor project had developed further, the Tomsk Centre for Environmental Audit and Management was set up in 2001, directed by one of the brightest Section Heads from the Committee. The Committee had subsidised it at first, but now, with a portfolio of activities which included education and training in environmental management and assessment, as well as certification, the Centre was becoming financially independent. Its Director was now a qualified Leading Quality Auditor and member of the (UK) Institute of Environmental Management and Assessment. She had undertaken 4 audits for IFC, which had brought publicity to the Centre and given it an excellent reputation. She now had 4 employees.

Work had started to move out from Tomsk City to other communities in the Tomsk region; there were now municipal committees throughout the region.

[1] Interview with Professor A.M. Adam, 16 November 2005.
[2] Interview with Oleg Nechorosho, 16 November 2005.

Tomski Raion, just outside Tomsk City, was particularly active. In 2003–2005, the Tomsk Region was the Russian pilot region for a big EU/UNEP initiative to promote Integrated Assessment and Planning for Sustainable Development and Tomski Raion was the pilot district within this. Professor Adam's Committee was the local partner; the Centre for Environmental Audit and Management took an active part.

The old Ecological Fund, with all its complexities, had been abolished. 40% of the payments from licensing discharges went directly to the Committee from the regional budget. (The system of collection was now unclearly defined.) The Committee made its own plans for spending this. I was surprised to find it still had powers to reimburse firms which installed equipment causing less pollution.

The final surprise was Professor Adam's response when I asked what had happened when Yukos changed ownership. He explained that Yukos had in fact cleaned up its production activities as promised and that its expenditure on environmental protection had increased over the years. "The new Yukos still collaborates; the operational management is unchanged. The main changes are in Moscow. Moreover, the local management of Yukos is increasingly interested in improving the environmental situation around its production sites. The Committee persuaded it that it needed international certification. With the help of Vera Bareisha's centre, one of the firms in Tomsk owned by Yukos has received ISO certification."[3]

7. Conclusions for the future development of Russian environmental policy

– All these improvements in implementation took place within the framework of existing legislation (despite what many Russians try to argue).

– The Ministry of Natural Resources, whilst predominantly old-style bureaucratic, is open to the adoption of good ideas, when it sees them.

– Foreign projects are sometimes (or perhaps always?) the vehicle by which these new ideas for implementation are brought to Russia.

– Dissemination of new methods from one Ecological Committee to the next is likely to be slow and difficult.

– Russian state bureaucracy is still a long way from understanding the pre-requisites for good implementation.

– Environmental policy, at the highest level, is regarded as too expensive and a useful political pawn (see the example of Sakhalin.) Nonetheless, at

[3] Interview with Professor A.M. Adam, 16 November 2005.

lower levels, Russia does have the legislative framework for a reasonable environmental policy, and, in some places, the capacity to implement it (*e.g.* Omsk, as well as Tomsk).

But it will be a long, hard haul.

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