A love match, a resource match, a good match? Comparison of the role of NGOs in Natura 2000 implementation in Poland and Hungary

Influence, outcomes and future prospects for Natura 2000 maintenance

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Abstract
With their accession to the EU in 2004, Poland and Hungary had to implement the Natura 2000 programme for biodiversity protection. In both countries NGOs have been active throughout the implementation process. Forms and outcomes of NGO involvement, however, differed. Hungarian NGOs were very influential during the site designation phase, working closely with the governmental authorities and contributing considerably to the country's site proposal. In Poland, the form of NGO's involvement changed from opposition towards the government (publication of a Natura 2000 shadow list) to close cooperation with public institutions, resulting in a significant expansion of site designations.
This paper analyses the role and impact of NGOs on Natura 2000 implementation in Poland and Hungary and seeks explanation for the observed differences with reference to the theoretical background of policy networks and advocacy coalitions. The qualitative data used for the study is based on in-depth interviews with NGOs representatives and officials of public institutions engaged in Natura 2000 implementation.
The comparison shows that the existing architecture of the sector of biodiversity governance is decisive for NGO activities and determines their role and impact. In the European multi-level governance setting new formal and informal opportunities were given to NGOs. In both countries NGOs became stronger during the Natura 2000 process. We argue that this was a result of the establishment of multi-level policy networks between the European Commission, NGOs and public institutions, based on resource dependencies. These networks were powerful enough to overcome dominating policy patterns in both countries. The differences found between Hungary and Poland could be explained by different discoursive positions of the responsible ministries. The change of government in Poland in 2007 shifted the discourse towards supporting conservation, which enabled the formation of an advocacy coalition between the government and NGOs.

Key words
Policy networks, advocacy coalitions, Natura 2000, NGOs, Poland, Hungary, biodiversity governance

Introduction

Policy making process is a subject of interests of various stakeholders. The outcome of policy processes emerge from bargains between the groups of actors, formally or informally linked by shared values, interests or practical interdependences. Understanding interests of involved actors, their discourses and resources, can be used for explaining the outcomes of policy processes. Although multiple actors increase complexity of policy processes, it is commonly believed that participatory policymaking brings better outcomes. Development of effective cooperation between state and non-state actors is perceived as necessary in modern democracies. Interplay between governmental and non-governmental organizations (NGOs) is particularly interesting in the new European Union membership counties, under the changing institutional conditions favouring the non-governmental sector.

The case of biodiversity conservation in Central Eastern Europe is an interesting subject for research on public policy. Lack of well-established cooperation between the state and NGOs in environmental policymaking and recent accession to the European Union followed by rapid empowerment of non-state actors, are potential drivers of change in the governance settings. The analysis presented here considers implementation of European legislation on biodiversity conservation in the two study countries.

Natura 2000 network

With their accession to the European Union in 2004, Poland and Hungary had to adopt and implement the Birds and the Habitats Directive by designation sites to become part of the Natura 2000 network. The aim of Natura 2000 is to assure the long-term survival of Europe's most valuable and threatened species and habitats. The establishment of this European ecological network was agreed upon by the governments of the EU member states in 1992 with the adoption of the Habitats Directive (92/43/EEC), and the incorporation of bird protection areas designated under the Birds Directive of 1979 (79/409/EEC).

For bird conservation, site selected by the member states are directly designated as a part of Natura 2000 network (European Commission, 2002). The procedure for implementing habitat conservation sites is more complex and takes place in three stages.

(1) Proposal of the sites by the member states; the accession countries had to send this proposal to the European Commission by the date of accession (May 1, 2004 in case of Poland and Hungary). In the case of Poland, the first proposal in 2004 was highly incomplete and contested by NGOs. Development of proposed sites was gradually continued until 2009.

(2) Selection of the sites in bilateral negotiations between the European Commission and the member states. In so-called "biogeographical seminar" the proposal is discussed with experts from the European Commission, the European Topic Centre on Nature Protection and Biodiversity (ETC), member state officials and experts representing stakeholder interests of owners and users as well as environmental NGOs or independent experts (European Commission, 2002; Papp & Tóth, 2004). In case a Natura 2000 habitat type or species is insufficiently represented in the country´s pSCIs, additional sites or further scientific clarification is demanded. The biogeographical seminar in Hungary took place in 2005, in Poland series of seminars were conducted in 2005, 2006 and 2010 (ETC/BD, 2009; Makomaska-Juchiewicz, 2009).

(3) Establishment of management regimes for the sites. Within six years after the selection appropriate measure to ensure favourable conservation status of the sites have to be developed (European Commission, 2002). This final stage is still an on-going process in both case study counties countries.

Member states are obliged to ensure the favourable conservation status of all Natura 2000 species and habitats. Effective conservation within the Natura 2000 network is to be ensured by European regulations, mandatory incorporation of Natura 2000 into national legislations, management regimes and the requirement of environmental impact assessments wherever it is not proven that the favourable conservation status will be sustained. The way how particular member states fulfil their obligation concerning the Natura 2000 network is evaluated by the European Commission and can be a subject of a proceeding in front of the European Court of Justice.

Policy networks and advocacy coalitions

To explain the process of policy change in Poland and Hungary and the differences between the two countries we used a pluralist and neo-pluralist model of state-group relationship,

which conceptualises public policy as the result of competition between various groups of interests on the political arena with structural inequalities (Carter, 2007). We assume that with regard to biodiversity conservation policy, similarly to other policy domains, there is a number of actors, group of interests, organisations, etc. which try to shape directions in which the policy and its implementation, is developing. In order to do so, policy actors use their resources: finances, organisational capacity, expertise, access to public officials, impact on public opinion, etc. Power is diffused in the policy domain and various actors can achieve their objectives provided they can mobilise enough resources. That does not mean that actors have an equal position. Due to governmental sectoral fragmentation policymakers tend to favour key producer or professional groups whose views are regarded as legitimate and important and who enjoy good access to officials of a specific ministry and are regularly consulted with regard to policy plans (Hall, 1993). As a result, apart from actors' agency, there are also structural and ideational factors shaping the policy direction. For the purpose of this paper we focus on two models of a policy process which take into account these characteristics of the political system: policy network analysis and advocacy coalition framework.

Policy network analysis (Rhodes, 1990, Marsh and Rhodes, 1992) focuses on the role of the interdependencies between the actors involved in policy-making and their influence on policy development. Policy networks are defined as clusters or complexes of organisations (public and private) connected to each other by resource dependencies and distinguished from other clusters or complexes by breaks in the structure of resource dependencies. These networks differ in terms of level of integration, membership and distribution of resources and might be distributed along a continuum ranging from policy communities to issue networks (Marsh and Rhodes, 1992). The former are characterised by stability of relationships, restricted membership, vertical interdependence and insulation from other networks and the general public. They are also highly integrated as a result of a resource dependency. The latter include a large number of actors with a limited degree of interdependence. The membership fluctuates and interactions between the actors are less regular. Policymakers consult actors rather than bargain with them and the policy outcomes are less stable and predictable. Between these two ends of the spectrum there are hybrid forms of policy networks (e.g. professional networks, producer networks). Policy networks change mainly because of external factors affecting existing power relations. Carter (2007) identified five such external factors which seem particularly significant in shaping environmental policy: (1) a sudden crisis (e.g. Gulf of

Mexico oil spill); (2) a new problem with which the government is faced and for which the dominating policy community has no immediate solution (e.g. climate change); (3) changes in relations external to the policy domain (e.g. influence of European directives, privatisation); (4) the emergence of new social movements and pressure groups; (5) despotic power use of ministers who can use their capacity to break up a policy community.

In contrast to policy network analysis and its focus on resources, interests and power, advocacy coalition framework (Sabatier, 1998, Sabatier and Jenkins-Smith, 1999) emphasizes the role of ideas and information in shaping policy change. This approach assumes that actors within a particular policy domain (sub-system) can be aggregated into a number of advocacy coalitions, each including people from various state and non-state organisations (group leaders, agency officials, legislators, researchers, journalists, etc.) which both share a set of normative and causal beliefs and engage in coordinated activity. The belief systems of each coalition are organised into a hierarchy with three levels: (1) the *deep core* of the belief system includes basic philosophical values that apply to all policy domains (e.g. left-right divide); (2) *policy core beliefs* represent coalition's fundamental values and causal perceptions across this particular policy sub-system (e.g. seriousness of the problem of biodiversity loss and its principal causes); (3) *secondary aspects* of coalition's belief system including relative importance of different causal factors in specific localisations or the design of specific institutions (e.g. organisation of nature reserves). The framework assumes that the second tier of beliefs – the policy core – constitutes the fundament of coalitions within a policy domain. Each coalition adopts strategies to alter the behaviour of governmental authorities in line with policy objectives of the coalition. Conflicting strategies of various coalitions may be mediated by a third group of actors – policy brokers – whose objective is to find compromise and reduce conflict. According to Sabatier and Jenkins-Smith (1999) policy change has usually an incremental character and results from 'policy oriented learning' which through new information and experience affects secondary aspects of the belief system. This learning is instrumental as coalition members resist information which might undermine the deep core or policy core beliefs. Another important sources of a policy change constitute external shocks from the real world (e.g. economic crises or major political shifts) and turnover in personnel. These non-cognitive, external factors might alter not only secondary aspects of the belief system but also its core.

Comparison of the role of NGOs in Poland and Hungary. Research questions

Considering biodiversity conservation challenges in the study countries, and the theoretical approaches examined, the presented analysis tries to answer the following research questions:

- What was the role and impact of NGOs in the Natura 2000 implementation process in Poland and Hungary?
- Did the implementation process benefit from NGO engagement? (Why and how?)
- What are the differences between the two countries?
- What is the explanatory power of policy network and advocacy coalition framework for these differences?
- Which theoretical framework has a more explanatory power in these two cases?

Methods

A qualitative study consisting of in-depth interviews was conducted in Poland and Hungary. Interviews were based on a preliminary list of questions (interview guides), recorded and transcribed or described in detailed field notes. The analysis uses 10 interviews conducted in Poland within the project EUMON in 2006, and following 6 interviews taken in 2010 as a follow-up research. In Hungary 26 interviews were taken between2008 and 2009. Interviews were taken with members of NGOs engaged in the Natura 2000 implementation process, representatives of public institutions (administration, ministry and research institutes) and volunteers working on the topic within NGOs. In total, 5 Polish and 8 Hungarian NGOs were included in the study.

This case study analyses the Hungarian biodiversity governance setting, which existed until April 2010. Following the change of government, ministries have been merged and several regional authorities are currently being reorganized. It is, therefore, still too early to study the new governance setting. Within the Polish study the main focus was on the designation phase, completed in the 2009, however challenges and opportunities for management of the Natura 2000 network were also discussed in the interviews taken in 2010.

Results. NGOs in the Natura 2000 implementation process in Poland and Hungary

In the implementation process of Natura 2000 in Hungary one can distinguish two main phases: site designation and establishment of Natura 2000 maintenance (site management and monitoring). In both phases NGOs played a role, their influence was, however, stronger in the first phase.

In Poland the process dynamic was more complex. The first years of site selection were characterized by a strong conflict between NGOs and the Ministry of Environment. The topic of Natura 2000 became highly political in Poland, and inconvenient to political leaders. To oppose marginalization of the policy by the state, NGOs submitted a Shadow list of protected areas to the European Commission. Because of pressure from the European Union, thanks to government change in 2007 and following institutional reforms, non-state actors were eventually invited to cooperate. Currently management and monitoring schemes are being developed with less visible involvement of NGOs, however particular NGO experts are often consulted.

During the designation, the Hungarian Ministry of Environment and Water asked BirdLife Hungary to prepare a proposal for the SPAs. With some smaller modifications this proposal, an updated list of Important Bird Areas (IBA) (Kovács et al., 2002), was then accepted by the government. For the sites of the Habitats Directive, Hungarian NGOs did not prepare a separate shadow list, as in the case of Poland, but communicated their wishes for site designation to the Ministry of Environment and Water already before the biogeographical seminar. As most of their wishes were accepted by the European Commission in the biogeographical seminar, Hungarian NGOs were very satisfied with the final list of Hungarian Natura 2000 sites. For fostering Natura 2000 maintenance, Hungarian NGOs have been involved in various activities. Most of the communication towards land users was conducted by or with the involvement of NGOs, which for this purpose were financially supported through EU- / government funded projects. Most prominently, NGOs developed the best website about Natura 2000 in Hungarian language. Together with partners from research institutes, BirdLife Hungary has also been active in projects aiming at developing models for Natura 2000 site management. Experts of NGOs are, moreover, active in site monitoring, thereby supporting the work of national park directorates. Based on their observation of violations to the protection status of sites, regional NGOs have initiated court cases in Hungary and informed the European Commission and Parliament.

Actors and resources

POLAND

The main non-state actors in Poland were NGOs engaged in preparing the Shadow list: (1) World Wild Fund Poland, (2) the Polish Society for Nature Protection ”Salamandra”, (3) the Naturalist Club, (4) the Polish Society for the Protection of Birds (Polish partner of Bird Life). Some of them were umbrella organizations, representing a number of local and less influential organizations. Among other NGOs interested in Natura 2000 the following should be mentioned: e.g. Association for Nature WOLF, Malopolska Ornithological Association, “Pro Natura”, Pracownia na Rzecz Wszystkich Istot, Committee of Eagle Protection. NGOs cooperated intensively with research institutes, especially the Institute of Nature Protection of the Polish Academy of Science in Kraków (IOP PAN). The Institute was engaged in the policy implementation from the beginning, conducting projects regarding site selection, inventory and current monitoring. Several researchers employed at, cooperating with or graduated from the institute are members of NGOs engaged in the process.

Among state actors, the Ministry of Environment was responsible for Natura 2000 implementation until institutional changes in public environmental institutions in 2008. A new body of General Directorate of Nature Conservation and its regional directorates were established, which decentralized and separated decision making from current politics. The State Forests National Forest Holding (referred as State Forests in the article) is responsible for management and monitoring of Natura 2000 sites in forests, at the beginning of the process highly interested in marginalizing the role of the Natura 2000 network due to conflicts with the current forest management goal. National parks and the authorities of other protected areas did not have any significant influence on implementation of the Natura 2000 network. They will, however, be responsible for management in the future. Local authorities of municipalities included in the Natura 2000 network effectively participated in the last year of site designation; they can become significant players in the following development of management schemes.

During the whole process, the Ministry of Environment was highly depended on expertize provided by NGOs, directly or indirectly. From the very beginning, financial resources provided by the Polish state and the European Union were insufficient for proper site selection, which should be based on profound inventory of proposed areas, within the given

time restriction. Various NGO reports, analysis, data or expertize, were used throughout the process especially for the bird areas. To marginalise non-state actors and their extensive proposition of the network (published as Shadow List), State Forests was contracted for taking inventory of habitat areas. However, due to lack of knowledge and experience, regional forestry units employed NGO experts to facilitate the survey. At the beginning of the process NGOs influenced national implementation also through their connections with the European Commission.

HUNGARY

There are four leading NGOs in Hungary who working on Natura 2000 at the national level: (1) The Hungarian Ornithological and Nature Conservation Association (Hungarian partner od Bird Life International), (2) The National Society of Conservationists (Friends of the Earth Hungary), (3) World Wild Fund Hungary (WWF Hungary) and (4) The Central and East European Working Group for the Enhancement of Biodiversity (CEE web).

The Hungarian Ornithological and Nature Conservation Association founded in 1974, is currently the biggest Hungarian NGO with ca. 10,000 member. In general, bird protection initiatives can be seen as the motor of nature conservation in Hungary, where thanks to the rich bird life there are many active bird watchers and ornithologists. The National Society of Conservationists is the largest Hungarian umbrella organisation for green NGOs. Total number of members associated in its local and regional partners exceeds 30,000 individuals. CEE web is an international umbrella organisation of Central Eastern European NGOs, based in Budapest. It was mandated by the European Habitat Forum, a European umbrella organisation of nature conservation NGOs, to prepare the NGOs of the accession countries for the Natura 2000 process.

Hungarian nature conservation NGOs working at the national level, especially WWF Hungary and BirdLife Hungary, have excellent links to European level NGOs, mostly via their umbrella organizations. Once a year all Hungarian environmental NGOs have a joint annual meeting, organized by The National Society of Conservationists, to exchange experiences and elect their representatives for governmental commissions. For the Natura 2000 site designation the four major national nature conservation NGOs cooperated very well among each other and formed a joint Natura 2000 working group, in which they worked in a complementary way.

Although BirdLife Hungary and The National Society of Conservationists have a strong local and regional basis through their local groups respectively their member NGOs, the exchange between the national and local level is less smooth and reliable than between the national and European level. This can be explained by the diverse interests and capacities of the smaller local and regional NGOs, which mostly work on a voluntary basis, while national and European level NGOs employ well-trained experts, and the fact that in the course of EU accession national level NGOs concentrated their attention on international exchange and invested less capacities in interaction with local NGOs.

The highest state body for nature conservation on the national level in Hungary is the Ministry of Environment and Water with its State Secretariat for Nature Conservation. The environmental ministry has two subordinate regional bodies for nature conservation issues: the National Park Directorates, which are regional nature conservation administrations responsible for monitoring and management of protected areas in their administrative territory, i.e. not only for the core areas of national parks, and the Inspectorates for Nature Conservation, Environmental Protection and Water Management, which have the authoritative competence for environmental protection, water management and nature conservation. The task of preparing the Natura 2000 site proposal was delegated to the National Park Directorates; the ministry then combined the data into a country list for Hungary. Additionally, there is a strong activity of regional NGOs, concerning regional nature conservation, monitoring and management of protected areas, including Natura 2000 sites.

As important financing for Natura 2000 land management can only be provided through agricultural programmes, and because decisions about land management are crucial for biodiversity conservation, the Ministry of Agriculture and Rural Development is also a central actor in Natura 2000 implementation. In some cases also other land using sectors and their ministries, like transport or defence, are core actors. Since the land using sectors were hardly involved in Natura 2000 development and designation, and as they are faced with restrictions, they are mostly not supportive of the programme.

Table 1 compares various types of resources of the state actors and NGOs, and gives information on interdependencies between the two groups of actors. When not specifically indicates it applies to both countries. Resources which are only relevant for one country are marked with HU/ PL in brackets for Hungary respectively Poland.

Resources	State actors	NGOs	Interdependences
Financial	Insufficient national funding for Natura 2000 implementation Funding located within the agricultural ministry (HU)	Diversified funding sources Increasing dependence on EU-funded projects. Possible loss of independence	State dependence on free data and expertize provided by NGOs. NGOs funded through national and EU-funded projects
Time	High time pressure	Pre-accession awareness and preparations to the N2000 implementation (HU) Faster access to information	NGOs distribution of current information from European Commission is faster than the information-flow via official governmental channels
Human resources and organizational capacity	Insufficient number of experienced employees in some state bodies Responsibilities split between environmental and agricultural ministries (HU)	Well-trained, English speaking, experienced members and employees (national level) Dependence on voluntary work	NGO experts engaged by state actors through formal and informal contacts Employing NGOs for field work cheaper than employing companies
Expertise, knowledge and data	Well-trained conservation experts in the ministry and the national park directorates (HU) Few conservation experts on the regional level, in sectors of agriculture and forestry	Exclusive employment of nature conservation experts The use of voluntary work of experienced experts Ownership of monitoring data	Exchange of monitoring data between actors Delegation of advanced expert projects to NGO, university or independent experts
Enforcement capability	Incorporation of EU directives into national law Via management regimes and EIA (regional bodies)	Via reporting to the EC and European Parliament; through suing state bodies in front of national courts or the European Court of Justice Using media pressure (PL)	Disagreements results in conflicts and delays in implementation. Compromise preferred by both sites
Access to the European Commission (EC)	Through official channels	Via international umbrella organisations (see: Time) Direct alerting to the EC, effective watch-dog role	State bodies aware and afraid of capacity of NGO to protest and enforce via EC
Accession to the EU	Mainstreaming environmental discourses. Empowerment of nature sector (PL)	Opportunities for participation in policymaking ensured by law	Cooperation of state and non-state actors in EU-funded projects
Access to national politics	Strong political support for protected areas, yet land use sectors more important (HU) Insufficient cooperation between sectors (HU) Strong political pressures on the Ministry of Environ. (PL)	Excellent links to the environmental ministry (HU, PL after 2007) Divers quality of political connections on regional levels	Good connections within the environmental sector – state and NGOs. Common advocating against land using sectors (HU) Competing discourses: development vs. environmental
Impact on public opinion	Very little (HU) High, via development-oriented discourse (PL)	N2000 website in national languages General education about N2000 (limited impact)	State benefits from increased awareness of the program. Educational activities of NGOs state and EU-funded.

Table 1. Resources of state actors and NGOs engaged in Natura 2000 implementation. HU – resources engaged solely in Hungary; PL – resources engaged solely in Poland.

Policy networks and discourses

Members of Hungarian NGOs and the people working for state nature conservation bodies share the common value of nature protection, which they in most cases prioritize over economic or social considerations; most people belonging to the nature conservation sector believe in an intrinsic value of nature. Hungarian nature conservation began with bird conservation and is still dominated by this branch. There is a strong identity of the nature conservation sector, which may be reinforced due to the fact that they oftentimes find themselves and the value of protecting nature in a defensive position threatened by economic interests.

Within the Hungarian environmental sector one can also find a difference in discourse when looking at how different groups value stakeholder involvement. NGO officials have emphasized the importance of involving affected stakeholders of nature conservation schemes from the beginning; they have actively informed stakeholders through communication initiatives. The Ministry of Environment and Water pursed a more technical approach towards Natura 2000 implementation, focusing on fulfilling its duty of implementing EU regulations. It is not clear whether the ministry was truly interested in communication as it delegated most communication tasks to NGOs.

In many Hungarian National Park Directorates, which traditionally pursued a rather top-down strategy in the management of protected areas, one can observe that some officials have become supportive of good communication and participatory approaches for land management.

Agriculturalists and Foresters in contrast value nature for its use value and the economic benefits generated through land management. Since they have been responsible for land management for a long time, they believe that they know best how to manage it. With the restitution of nationalized land after the regime change, farmers could again value their property rights. They are therefore not easily willing to accept new restrictions on land use.

Other land users, like the transport, infrastructure and housing sectors, as well as the ministry of defence, also value land and nature for its use value, usually focusing on the potential for economic development. Potential for economic development has over the last two decades also become the dominating discourse with the general public in Hungary.

Poland entered the EU in 2004 with already well-established policy network of top Ministerial officials, State Forests and hunters, governing the nature outside of existing protected areas which then became a part of the Natura 2000 network. After accession European legislation (Habitat Directive in particular) and European Commission became a significant player itself. NGOs used its support to build a competing policy network, and became an influential player. When governmental change took place, NGOs received significant support from top politicians. A new governmental agency responsible for Natura 2000 was created, less dependent on political pressures and joining the NGOs' policy network. There was an opposition from the competing network which, however, had to give up due to the strong position of the opponents. As a result they started following the rules and even to some extent become a part of this network (State Forests).

Several drivers of the change in the networks setting can be identified. The most important is the superior role of the European Commission and European legislation to national government and practices. It enabled NGOs to formally and informally enter the implementation process. Political attempts to marginalize both the role of NGOs and the Natura 2000 program itself, could not be successful where strict European law was applied. Resources of the old network were insufficient for successful implementation. High time pressure and threats of ceasing European funding for infrastructure investment made cooperation with NGOs necessary. Additionally, along with a conflict in Rospuda Valley, influential social movement supporting biodiversity conservation arose.

Preliminary conclusions and outlook

The theoretical frameworks of advocacy coalitions and policy networks proved to be complementary in explaining policy processes in Poland and Hungary and differences between the two counties. In both cases competing discourses were identified (environmental vs. land using- and development oriented ones in Hungary; environmental vs. development-oriented in Poland), however the condition of successful designation was mainly a policy network of NGOs and state bodies. Relatively smooth policy process in Hungary can be explained by an already existing strong policy network at the time of accession to the EU, sharing the common values and discourses. Governmental settings in Poland used to be less favourable, however EU structures facilitated changes in distribution of power between actors

and the emergence of new policy networks. Development of the new policy network would not have been possible though without a discourse shift at the highest political level, towards favouring nature conservation. Rapid establishment of the network in Poland was possible due to European Union interference.

In both Poland and Hungary the role of NGOs decreased after completing designation of Natura 2000 areas. In both cases state members of "pro-environmental" policy network gained enough confidence and experience to undertake more independent actions in developing management regimes. In Poland cooperation between the Ministry of Environment and NGOs developed into less formal contacts between state regional bodies and individual experts.

In the European multi-level governance setting new opportunities were given to NGOs, who gained more power to enter and change existing policy networks. Dependence of public conservation bodies on NGOs resources can explain the role of the latter in shaping the policy implementation within the network. Cooperation between NGOs and state nature conservation bodies in Hungary could be based on informal contacts within an existing advocacy coalition. In Poland the form of NGO actions considerably changed from opposition (publication of a Natura 2000 shadow list) to cooperation with public institutions, reorganizing existing policy networks and mainstreaming a pro-conservation discourse.

The comparison shows that the existing architecture of the sector of biodiversity governance is decisive for NGO activities and determines whether they prefer to cooperate informally with state authorities or to oppose them publicly. For Hungary this may mean that the changes in the institutional setting of the state environmental sector as initiated by the new government may result in different patterns of NGO activity.

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