

The European-U.S. Dispute On Climate Change

*Edit Antal**

The comparison between the U.S. and European Union positions on climate change may illustrate two different conceptions of how to solve global problems in the future. During the benchmark international ozone negotiations, the United States was still the leader.¹ Today, it has radically changed its position and become the most important opponent of the December 1997 Kyoto accords, to the point that it holds the very fate of the

accords themselves in its hands. In contrast, the European Union, whose position has evolved in the opposite direction, today heads up the defense of the original spirit of the agreements.

In accordance with the 1992 Rio de Janeiro agreements, the Kyoto Protocol established different commitments for different countries: 35 industrialized countries would reduce their emissions an average of 5.2 percent, among them the United States, with a 7 percent drop and the European Union, with 8 percent. The vast majority of nations has

still not ratified the agreement, mainly because of strong U.S. opposition to two points: the protocol establishes that only some nations lower emissions, leaving out the developing countries, and that at least part of the emission reductions be non-negotiable, regulated and obligatory. The final meeting where the fate of the protocol will be decided is slated for this year in The Hague.

The U.S. rejects the reduction of greenhouse effect gas emissions under the Kyoto Protocol conditions and demands increased commitment from

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Photos by Dante Barrera

developing countries since, if they reduce their emissions, it could create a flood of permits for the emissions trading proposal the U.S. supports.² The European Union (EU), in contrast, accepts the reductions agreed upon in Kyoto and proposes a mixed mechanism that would combine both direct regulation and market mechanisms. It does not think that developing countries should have to reduce their emissions for the moment and also proposes limiting permit trading to only half the emissions while the other half would be controlled by regulated domestic reductions.

One of the keys for understanding this shift in the European Union's position is the process of integration of its member countries, bringing to the fore all the policy areas which strengthen it and the power of common decision making bodies. In the case of the United States, the concrete decision making process in environmental matters tends to block taking on bigger commitments in a global policy.

This divergence is linked to several different factors, the first being the objective situation of the energy issue in each country. But the cultural perception of the problem of climate change, the nature of environmental policy, the decision making process itself and the institutional structure also have an impact. In the U.S. view, climate change and the concrete commitments stipulated in the Kyoto convention constitute loss of sovereignty and economic competitiveness. In contrast, for the EU, with its mixed identity emanating from its member states and the European Commission (understood as a supranational body), they mean the strengthening of its col-

lective authority. This is basically because, over recent decades, the countries have already handed over part of their sovereignty to be able to integrate and because they have managed to set up mechanisms to thrash out differences among member countries, sectors and different policy levels.

THE ENERGY SITUATION

In 1991, the United States was responsible for 26 percent of the world's carbon dioxide (CO₂) emissions and the European Union, 16 percent. This made for a per capita rate of 18.6 percent in the United States and 7.8 percent in Europe, with a 3.7 percent world average.³ The greenhouse effect index to measure pollution used by the World Resources Institute puts the U.S. rate at 19.1 percent, while in Germany it is only 3.8 percent and in France, 1.6 percent.⁴

The U.S. position is based first of all on its historic access to an abundance of cheap fossil fuels, which explains why the costs of reducing CO₂ emissions is perceived as very high compared to the potential impact of climate change, considered uncertain and moderate. The United States is the world's second oil and natural gas producer and first coal producer. In fact, the U.S. is both the main producer, consumer and importer of energy in the world, which is why it is a determining factor in the world equilibrium between supply and demand.⁵ It has achieved all this thanks to the existence of an ample supply of low cost energy, which, in turn, created a culture of squandering relatively dirty and cheap energy. This culture has historically

marked U.S. industrial development and made it common for the public to see any restriction in energy consumption as a sensitive matter for the U.S. economy. In line with this, Rayner thinks the U.S. economy depends just as much on fossil fuels as heroin addicts depend on needles.⁶

In general, the energy situation in Europe is the opposite of that of the United States. Its dependence on external sources and the use of different kinds of energy (nuclear, hydroelectric, natural gas, oil and coal) make it less dependent on fossil fuels than the United States. This means that the Kyoto accords have a much more limited impact on its growth. In fact, the overall carbon dioxide emissions in the largest EU countries has dropped since the 1970s, although in recent years it has increased.⁷ In France, 85 percent of electricity is generated by nuclear power; in Great Britain, 35 percent and in Germany, 25 percent.

So Europe is characterized by high energy costs, the export of dirty industry and an energy-saving culture and life style. Undoubtedly, the reductions achieved until now are due not only to the economic factor, but also to concerted government policies.

Comparing energy prices is particularly interesting. While in the United States, electricity costs the average person U.S.\$84 and industry U.S.\$47, in Europe the costs are U.S.\$137 and U.S.\$79 respectively. In the most developed European countries, like Germany, for example, the differential is even greater: U.S.\$204 and U.S.\$101, respectively.⁸

The United States estimates that to live up to the Kyoto commitments it would have to reduce its emissions by one-third,

incurring a greater cost than, for example, Japan's or most of the European countries.⁹ Studies by Alan Manne and Richard Richels maintain that a 20 percent reduction could cost the U.S. economy between U.S.\$800 billion and U.S.\$3.6 trillion.¹⁰

CULTURAL CONCEPTIONS

The U.S. view of global warming can be categorized as pragmatic and political, compared to the German perspective, which tends to be principled, or the British idea, which is fundamentally skeptical.¹¹ The pragmatism is visible in the basically commercial and cost-effec-

tive orientation to the search for a solution to the problem, while its political nature is clear in the consideration that the issue is a political battleground where interest groups, Congress, the administration, isolationist and internationalist forces and supporters of regulation and of a free market all enter the fray. As a result, the scientific uncertainty that actually does exist, of course, about such a complex issue as climate change tends to be interpreted in political terms. That is, the different scientific views seem to be simply products manipulated by particular actors.

The U.S. elite's view of climate change is characterized by a profound

faith in the strength of its country expressed in the notion of U.S. world leadership and the international responsibilities derived from it. Nevertheless, there is also another way of perceiving the issue: isolationism, a kind of counter-reaction to the internationalist view, with a tendency to reductionism by only taking into account domestic needs. In the United States, environmental beliefs and consciousness are inspired clearly in an anthropocentric view of the world and conceive of nature somewhat religiously. Not only does this mean that nature tends to be considered something relatively stable and human interference not very decisive, but also that in general

TABLE 1. ENVIRONMENTAL TRADITIONS, DOMINANT VIEWS AND POLITICAL POSITIONS ON CLIMATE CHANGE

	United States	Germany	United Kingdom
Basic cultural characteristics	Universal-analytical	Result-centered Profound thinking	Individualistic and analytical
Conception of nature	Anthropocentric "Wilderness"	Global unity Unstable "Wald" (forest) Countryside	Local Divisible entities Stable
Environmental consciousness	Religious Anthropocentric Political Modernist	Principled Threat/risk Global orientation Technological change	Skeptical-scientific Modern rationalist Local nature
Climate change	Political issue Not very dangerous Lacks overall consensus	Global Ecological challenge Overstated	Costs Uncertainty Energy issue
Political position	Soft goals Joint implementation Voluntary Cost-benefit analysis	Hard goals Structural focus Technological innovation Regulationist policy	International forum Commitments Market policy and energy market

technology and science are assigned positive values and the notion of risk is linked preeminently to the risk to human life. On the other hand, nature is assigned a great deal of value and undoubtedly considered one of the most important conditions for human life.

Taken as a whole, these characteristics mean that the concern for the environment is less pronounced, for example, than in most developed European countries, particularly with regard to specifics and above all global environmental issues.

U.S. culture's main characteristics—such as being extremely analytical, severely individualistic and inward-looking, fact- and personality-centered, with individual interests viewed as an elemental social category—are also manifested in its people's vision of the environment, in which quantitative elements and pragmatism come to the fore and the country's individual interests as well as those of its corporations tend to be constantly mentioned and highly regarded.

Studies on the topic generally underline the agreement between tradition or environmental awareness (long-term concern, anthropocentrism, conservationism and the obligatory framework situated on the domestic level) and the confused nature of U.S. environment policies, particularly when dealing with a recent global environmental issue. The perception of climate change is a very limited concern¹² and is seen as a point of contention among different domestic and external actors who, in attempting to maximize their profits, use the issue as an argument in political debates, mainly in the battles between supporters of regulation and supporters of the market.

ENVIRONMENTAL POLICIES

The great difference between both international actors has been the object of many studies. In a recent working paper,



Imtiaz Hussain summarizes the main differences: a) Europe prefers multilateral action on agreements and reasonable principles while the United States favors selective criteria and dealing with each issue and country case by case; b) In Europe, regional action is as or more important than national action, while for the U.S., regional actions are clearly subordinated to domestic priorities; c) In Europe, the principle of subsidiarity allows member states to carry out independent actions while in the U.S. the question of sovereignty makes cooperation difficult; d) In Europe, the environment is included on each of the points of the union's and the international agenda, while in the United States it is dealt with

exclusively and directly by specific institutions; f) In Europe, environmental policy is carried out in four- or five-year programs that show a permanent concern, while U.S. policy is institutionalized and

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only reviewed once a year, which weakens its impact; f) In Europe, the environmental issue runs through all the others thanks to the guarantee of principles and norms, in contrast to the United States, where environmental policy tends to be selective, discussed in bilateral relations as specific problems; g) In Europe, the impact of environmental policy is distributed symmetrically through direct taxation; in the United States indirect measures, like for example, the permit market, make for an uneven distribution among the different sectors.¹³

THE DECISION MAKING PROCESS

The main factor that led the EU to become a real actor on the international playing field was the pre- and post-negotiation decision making process component, something absent in the United

States. Before comparing them, it should be said that environmental policy, linked to commerce in the United States, basically comes under the jurisdiction of the executive branch and, in the EU, of the Brussels Commission.

Although the European Commission is considered a dispersed, ambiguous actor internationally, its ability to negotiate the so-called mixed competence issues (such as climate change, in which both national and community interests are implicated) is increasing.¹⁴ A long, complicated process took place before and after the negotiation of the international treaties involving the commission, which repre-

sents the community interest, the Council of Ministers, formed by representatives of the member governments, and the societies at large in each of the member states. To a great degree, this facilitates the effectiveness of both the decision making and the implementation of the policies agreed upon.¹⁵

In contrast, in the United States, the organized energy lobbies, that are pro-market and represent the most powerful corporations, particularly in oil and coal, have historically occupied a privileged place in the decision making process and de facto permeate the formulation of public policy. The power of these lobbies is so

huge that, with the help of the Department of Energy, they were able to block the action of the Environmental Protection Agency under the Carter administration, which clearly agreed with EPA policies. Today, something unheard-of is happening: the EPA is the object of a serious accusation from the legislature questioning its ability to regulate carbon dioxide emissions.¹⁶

The structure of its institutions, particularly the sharp separation between executive and legislation branches, puts the United States in a very difficult position for negotiating a treaty about climate change. The U.S. position on the Kyoto Accords is limited by the adminis-

TABLE 2. POLITICAL MECHANISMS FOR CLIMATE CHANGE POLICY

	United States	European Union
Government Involvement	Traditionally low	Traditionally high
How Policy Is Developed	Dealing case by case	Dealing with it as a package
Political Style	Clash between executive and legislature	Mixed diffused mechanism and division of powers for creating consensus
Energy policy	Private	Public-Community
Regulatory Means	Indirect Asymmetrical impact	Direct Symmetrical impact
Link among Sectorial Policies	Weak	Strong
Link between Domestic and International Policy	Not differentiated; the second is the continuation of the first	Areas of mixed competence favor international policy
Ability to cooperate	The domestic level is the absolute priority	The regional level is just as important, if not more important, than the national level

tration's social base and the territorial political strength that being the majority in Congress gives the Republican Party since it is the Congress that ratifies and applies all international treaties. Congress has a growing faction that sees a clear tendency to lose sovereignty and for that reason puts the onus on the developing countries for their lack of commitment in reducing emissions.

Under these circumstances, the U.S. Congress is not likely to accept the domestic consequences of the existing international treaties. After the experience of the Uruguay Round, and more notably NAFTA, both parties in Congress feel they are losing control over trade matters, which used to be considered international questions and are therefore dealt with by the executive. They are now demanding a change. Thus, sectorial conflicts in the United States noticeably diminish the executive's ability to exercise leadership globally.

By contrast, what the EU calls mixed competence issues favor the commission's ability to negotiate in the international arena. Unlike the United States, the loss of sovereignty is no hindrance given that environmental accords are forged within the process of broad European integration and in the framework of a common philosophy, the values of which are broadly shared by all member states. Europe's mixed structure is more appropriate for accepting a restrictive global set of norms regarding climate change given that the sectorial-, subnational-, national- and community-level actors all actively intervene simultaneously in forging policy from the preparatory stages to the international negotiations themselves. In this way they build a consen-

sus that is an advantage when the time comes to implement the agreement.

In fact, a common policy is designed in the Brussels Commission where each member country intervenes simultaneously. The proposal is also made in the



commission but first it goes through a broad consultation on member-nation level through the ministries and social sectors. Finally, the decision is made in the ministerial council, which also consults with the private and public sectors.

In the United States, the simple fact that the legislature must ratify the accords without having participated in the proposal's design tends to create hostility, but only in the phase that follows the agreement negotiations themselves, when interest groups, miners, oil workers and farmers usually show their resistance. Congress is not really committed to the international negotiation, but it does try to avoid negative consequences for domestic politics. These circumstances produce

perfect conditions for the infamous environmental gridlock, a result of a basic disagreement among key interest groups.¹⁷

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CONCLUSIONS

On climate change, the United States favors no regrets and bottom-up politics that make for measures beneficial in and of themselves, although they continue to ignore the effects on the environment. It also rejects the European perspective based on prevention, considering it premature and idealistic. It also does not implement policies that demand a definitive change in user behavior to save energy, which in the experts' opinion would be the only really effective measure in a society accustomed to abundant, cheap energy. Not until consumption and production patterns based on a non-dense habitat, the use of automobiles, intensive resource utilization and high waste production change will it be possible to think about truly sustainable development.

The environment is already one of the factors in designing U.S. foreign policy.

However, climate change as a prototype of a global environmental problem is intimately linked with domestic U.S. politics given its relationship to a broad gamut of economic activities vital to the country. This is particularly the case in the energy sector, where consumption and production patterns are determined not only by politics, but also by the general cultural model.

This makes it enormously difficult for the United States to maintain its traditional leadership in the world on environmental issues because its foreign policy goals clash with the priorities and traditional mechanisms for building consensus domestically. Climate change would seem to suggest that foreign policy is simply an extension of domestic politics, and in the case of a country like the United States, the only surviving superpower, this is too narrow a reference point for it to be able to live up to its global role.

In the international sphere, the U.S. position on climate change clashes with the more inclusive, diversified view of the European Union, which today has the initiative worldwide. This is explained in part by its lesser dependence on dirty energy sources, but also because its cultural model is more energy-saving and above all because its political mechanisms aim more at creating consensus among different countries and interests—local, national and supranational—than at pursuing sectorial ends.

Nevertheless, Europe is also showing signs of weakness. On the one hand, its traditional decision making mechanisms are changing due to U.S.-like lobbying around new problems like the privatization of the energy sector and other

changes that have come about to increase global economic competitiveness. On the other hand, its communal institutions are also showing signs of crisis and authoritarianism which are becoming more and more visible with the broadening out of the union. But making its processes democratic or transparent could put its ability to create consensus around environmental issues at risk.

Europe can only maintain leadership on the environmental question and offer a different, more generous and efficient solution if it is able to deal with its increasing internal conflicts in the framework of European politics and stay away from the U.S. way of doing politics. ■■■

NOTES

¹ The ozone layer accords, known as the Montreal Protocol, date from 1987; they were so successful that they are still considered an example to follow in international negotiations.

² In an emissions trading program, sources of a particular pollutant are given permits to release a specified number of tons of the pollutant. Governments issue only a limited number of permits consistent with the desired level of emissions. Permit owners may keep them and release the pollutants or reduce their emissions and sell the permits. The fact that the permits have value as an item to be sold or traded gives the owner an incentive to reduce their emissions. <http://www.weather.vane.rff.org/glossary/index.htm>.

³ IPCC, *Climate Change: The IPCC Response Strategies* (IPCC, 1991), p. xxxiii. <http://www.unep.ch/ipcc/syn-trep.up5>.

⁴ Marvin S. Soroos, *The Endangered Atmosphere: Preserving a Global Commons* (Columbia: University of South Carolina, 1997), pp. 201-202. The index is an aggregate of the main gases that create the greenhouse effect, weighted according to the potential effect that each has in global warming.

⁵ Víctor Rodríguez Padilla and Rosío Vargas Suárez, "Políticas energéticas en América del Norte: desafíos y convergencias," Julián Castro, Robert J. Jackson and Gregory S. Mahler, comps., *Los sistemas políticos de América del Norte en los años*

noventa (Mexico City: CISAN/UNAM, 1999), pp. 415-430.

⁶ Matthew Paterson, *Global Warming and Global Politics* (London/New York: Routledge, 1996), p. 80.

⁷ Steven Hales, "The CO₂ Gap: Europe vs. the U.S. - Showdown in Kyoto," 18 September 1999. <http://www.weather.vane.rff.org>.

⁸ Richard Lawson, "Climate, The Kyoto Protocol and Cape Bojador," *Vital Speeches* 65, no. 23 (Pleasant, City News Publishing Co. Inc.) (15 September 1999), pp. 718-722.

⁹ Raymund Kopp et al., "Políticas sobre cambio climático posteriores a Kioto," *Cuestiones Mundiales* (Internet magazine) vol. 3, no. 1 (April 1998), pp. 1-8.

¹⁰ Alan Manne and Richard Richels, "The Greenhouse Debate: Economic Efficiency, Burden Sharing and Hedging Strategies," *The Energy Journal* 16, no. 4 (1990), pp. 1-37.

¹¹ This is the conclusion of Richard van der Wurff's work, "International Climate Change Politics. Interests and Perceptions" (Ph.D. diss., University of Wetenschappen, Netherlands, 1997), p. 334.

¹² Willett Kempton, James S. Boster and Jennifer A. Hartley, *Environmental Values in American Culture* (Cambridge, Mass., London: The MIT Press, 1995).

¹³ Imtiaz Hussain, *Environmental Protectionism and Comparative Observations in West Europe and in North America*, Documentos de Trabajo no. 38 (Mexico City: CIDE, 1998), pp. 1-33.

¹⁴ A. M. Sbragia and C. Damro, "The Changing Role of the European Union in International Environmental Politics: Institution Building and the Politics of Climate Change," *Environment and Planning C: Government and Policy* 17 (February 1999), pp. 53-67.

¹⁵ E. Antal, "Políticas globales del medio ambiente. Perspectiva comparativa entre Estados Unidos y la Unión Europea," *El Cotidiano* (July-August 1999), pp. 32-41.

¹⁶ U.S. House of Representatives Committee on Science, Hearing Charter for Joint Hearing of the Committee on Government Reform, Subcommittee on National Economic Growth, Natural Resources and Regulatory Affairs and Committee on Science, Subcommittee on Energy and Environment, *Is CO₂ a Pollutant and Does EPA Have the Power to Regulate It?* (Washington, D.C.: 6 October 1999), pp. 1-3.

¹⁷ M. Kraft, "Environmental Gridlock: Searching for Consensus in Congress," N. Vig and M. Kraft, *Environmental Policy in the 1990s. Toward a New Agenda* (Washington, D.C.: Congressional Quarterly, 1993), pp. 97-119.