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Structure in fifteen:

Similarities and peculiarities in the administrative geography of the EU

1. Introduction

During its existence for nearly half a century, the European Union (EU), as the successor of the former European Economical Community (EEC), expanded its regulation. In many cases and fields of policy this led to a more conforming and common system across the member states, ranging from a central phone number for rescue services, the amount of toxic pollutants, and state funds to companies, to the standard size of ladders in the Union. However, one topic that was let unchanged until present is the internal organisation and administrative division of the countries. Opposite to what seems to be the idea of some politicians and ‘public opinion’, there are no strict obligations on public administration for EU member states. The EU does not require the modification of the administrative division of a country. It is considered to be part of the internal affairs of the member states and the so-called White Book on European integration has no indication of the administrative division either (Temesi, 2004). When the former EU commissioner Millan was once asked to define the notion ‘region’, he stated that

“the organizational and political structure and building of regions in the member states is highly varied, which is mainly due to historical reasons. The member states are responsible
The reason for this autonomous jurisdiction of the nations themselves is mainly due to traditional differences between the countries, caused by the countries’ history, demographic situation, population, culture and politics. It is considered to be impossible to change these structures in a uniform way, besides there does not seem to be a reason for it, since the present differences do not hinder too much the execution of EU policy and its *acquis communautaire*. The result is a highly differentiated pattern of administration, where there are in the *EU15* (the 15 member states until May 1st 2004) 15 different systems, which vary in a greater or lesser extent from each other. And in the *EU25* there are 10 more solutions for coping with the question of public administration. This is not a strange phenomenon in the world if one considers the fact that within a single country like the USA the mutual dissimilarities between the governance structures of the 50 states are considerable.

Notwithstanding the mentioned variety, there are many similarities as well between the countries, and in general the variation can be structured in groups, which makes comparisons of the options possible. However, at the same time it has to be mentioned that there are differences between the theoretical juridical public administration, the system *de iure*, and the actual practise, the system *de facto*. Both will be described and compared in this study, which focuses on the different systems of public administration in 15 EU-members.

By doing this, the overview – that because of its compound has to be general, without focusing merely at details – might bring some structure as well as an example for (new) member states that are considering revising there own governance structure.
This new study, showing the situation of 2004, is not just an update of previous studies by other EU or individual researches. On the contrary, it follows a different approach, by not – endlessly – summing up tasks of different levels of government in national structures, but by taking the relations between the different levels as the base, using the 15 systems as examples of different solutions for dealing roughly with the same over-all problem. By doing so, the result is an analysis being in its essence one of public administration, but with a notable administrative geographical compound. The aim of this article is to offer readers of different background a compact overview and structured grouping of the administrative division and systems of 15 EU-members. The 10 new countries were, with some exception, left out of this text, partly because their systems are in many cases still highly dynamic and subject to change, at the same time most of the new systems did not become ‘settled’ enough to diagnose the exact power relations, jurisdictions and authorities, while added to this most of those types are in one way or another comparable with one of the 15 systems described.²

The structure is as follows. First of all, in section 2, the 15 different systems are grouped according to their nature, as there are federal, regionalized, decentralized and unitary governmental systems. A short background of the systems as well as some examples are given. In the next section, the respective governmental levels are discussed as far as their public administration is concerned. Each type is described by using examples from the several nations. As far as the local governments are concerned, an actual classification for the EU25 is proposed, based on the statistical data of 2004. Since this topic mainly focuses on the theoretical relation and powers, section 3.4 makes some short remarks concerning deconcentration and financial autonomy. The text is
concluded by some actual tendencies and the attempt to show the relation between the theme discussed and a more universal trend, called ‘glocalism’.

2. **Structuring in differences:** governmental systems in the EU15

2.1 **Introduction**

As mentioned before, the administrative systems vary among the 15 member states. For most of the countries it is the result of a historical development of traditions, mixed with attempts for more efficiency. Countries like Germany, Italy (and Austria), that have been nation-states only for a relatively short period, established by merging and joining of several former independent territories, still have a division that is rather federal or regionalized. Also countries with different cultural groups within its borders like Belgium, Spain and to a lesser extent the UK, have a system that gives special authority for different parts of the country. On the other hand we can find the influence of attempts in history to centralization or otherwise the influence of the legal system of one country to the other one, so-called legal transplants or diffusion (Watson, 1974; Örücü, 2002). This is for example the case with Napoleonic relicts in the present structure of France, Luxembourg and, only slightly but still, in Belgium and The Netherlands.

In order to shape some structure in diversity, some grouping will be proposed at first, followed by a discussion of the different types of systems. Afterwards, in the next section each level of government (region, (second) meso level, local) will be discussed.
for the different models, giving an overview of the differences in authority. An exhaustively treatment should not be expected, due to the available space. Finally it should be brought to bear that it only shows the present state of a highly dynamic subject.

2.2 Grouping of governmental systems

2.2.1 General

Characterizing a nation’s governance structure is very hard, since there are many peculiarities that differ between states or are a specialty of a country. Although many authors made extensive studies on this topic (Norton, 1991, 1994; Jeffery, 1997; Stoker, Hogwood & Bullmann, 1996) they disagreed for most of the cases, depending on which subject they put the most emphasize. In this study, a division into four groups is proposed in Figure 1: federal, regionalized, decentralized unitary and centralized states. The author is aware of the arbitrariness and welcomes discussions on this topic. He based this division on the tasks of governmental bodies and the systems of public administration, as described below.
Centralized (classical unitary) | Decentralized (unitary) | Regionalized | Federal
---|---|---|---
Luxemburg | Denmark | Italy | Germany
Ireland | The Netherlands | Spain | Austria
Portugal | Sweden | | Belgium
| United Kingdom | | |
Finland | France | Greece


Figure 1:
Types of administrative systems of the EU15

2.2.2 Federal states

In federal countries, the power is divided between the central government and the states, meaning that generally subjects like international relations, defence and finances are of the state’s interest. The federal entities possess a huge amount of autonomy for other fields of policies, as is explained below. At present, there are the two quite similar federal systems of Germany and Austria and more recently the complex Belgian system, which divides the power – mainly - between the Dutch and French language groups.

2.2.3 Regionalized states

In regionalized countries, some or all of the regions have disposal over many subjects and in this respect they can be considered to be comparable with the federal system. However, their powers are not as extended as in Germany, Austria and Belgium,
although Spain comes close. The background of this autonomy is mainly based on social-cultural and historical differences between the entities that form the state. It means that the regions are not only legislator and planner for economical planning or regional development, but are responsible for matters of ‘internal’ affairs affecting their territory and population as well. However, this responsibility is normally to a higher or lesser extent limited by the power of the national executive and legislature. At present except for Spain, also some Italian regions do have this status as will be discussed in more detail below and because of this, those two countries can be described as regionalized. The same system is actual the fact for the autonomous Portuguese regions Açores and Madeira and Finnish Åland, but since these are only parts of the state and the rest of the country is not divided by this system, Portugal and Finland can not be called regionalized.

2.2.4 Decentralized states

In decentralized systems, the country is still a unitary state where normally national law derogates and prevails over law of lower governmental levels. At the same time are the meso and local level of government given special tasks, responsibilities and a higher degree of execution of – national - law in mandates than in centralized systems. It is difficult to define these responsibilities, especially since there are in many cases differences between the theoretical possibilities according to law and practise. The policy theory for decentralization is in general that decisions can be made more effectively and efficiently at the level at which the problem occurs. This feature is generally referred to as the idea of subsidiarity. It is not new and for the first time it was already proposed and discussed by Aristoteles (Dunn, 1995) and also Thomas of
Aquino, for example, supported the idea (Norton, 1991). In such systems generally more authority is given to second tier governments at the meso level like regions and counties/provinces, and to local governments as well. The degree of decentralization, especially found in subjects like economical planning, infrastructure, environmental policy etcetera, depends on the topic and is also related to the size of local governments; normally we can find larger local governments in these states. The division is subjective due to the large differences. However, especially The Netherlands, Portugal, Sweden and Denmark\textsuperscript{3} are characterized by their amount of decentralized policy (as will be explained more detailed below). France used to be the classical example of a centralized country and towards the more than 36,000 local governments this is still the case. However, the regions – and to a lesser extent the departments - are executing many tasks by now. Defining the country as regionalized could be highly criticised, since there is no real legislative exclusive power except for the central level.\textsuperscript{4} Finland is like France somewhere between, since the provinces and municipalities have been facing an increasing executive and legislative power. Last but not least there is the United Kingdom of Great Britain and Northern Ireland. According to many studies, the country used to be quite centralized, since a real meso level did not exist (anymore) (see e.g. Norton, 1994; Byrne, 1990). However, the local level is fairly strong, which is of course related to the fact that they are among the largest in the EU in respect of their population. Since a couple of years, Scotland, Wales and Northern Ireland where given more autonomy and even an own parliament, after debates for decades. Especially Scotland asked for this. Quite soon, the power of Belfast was taken over, not for the first time in history, temporarily by London again, until present. The result is not a federal union, but in some respects it could be described as regionalized.
2.2.5 Centralized states

Finally there are the classical centralized states, where the administrative power of the governmental level lower than the central one is quite weak. This is the case in small countries like Ireland and Luxemburg, or in traditional centralized countries - for different historical and constitutional reasons - with a homogenous population, like Greece, which country is somewhere between as well. In those countries there is no real need for a division. It should be mentioned that in these systems the state control and execution is guaranteed and efficiently put into practise by deconcentration, as will be explained in section 3.4.

Originally the group of centralized countries used to be much larger, including totalitarian regimes (like e.g. Spain and Portugal) and the former socialist countries in East- and Central- Europe. It seems like the system, partly influenced by the “Europe of the Regions” slogans and policy instruments (see e.g. Le Galès & Lequesne, 1998), is losing its popularity to decentralized and regionalized structures.

3. Public administration at different governmental levels

3.1 Regional governance and regionalism

A real autonomous ‘regional’ government like in federal states decides exclusively on many subjects, without interference of the national state. The result is that policy differs a lot between the ‘regions’, according to the democratic ideal of self-government, even
if it is still at a high level, and offering the possibility for special solutions and choices fitting the region’s special characteristics.

In *Germany* and *Austria* the system is quite well comparable. According to the constitutions, certain tasks are the exclusive competence of the federal (national) level. Those are *limitedly* summed up, as the most common ones are: foreign (international) affairs, defence, currency and nationality questions. For these fields, the Länder (states) are only competent to make regulation when they are given power by delegation. Generally spoken, all other subjects, not mentioned in the limited list, are automatically the responsibility for the states. Further on, there are tasks that are the subject to concurrence of responsibility between federal and regional governmental level. It means that as long as the central level did not make regulation for policy that is their responsibility, the states themselves will be able to make regulation, as long as it does not conflict other national law. However, there are some additional fields (as e.g. criminal law, social security, environmental pollution) that are according to the constitutions the responsibility for the federal level of government: *a)* as long as regional policy would be ineffective, *b)* if it would lead to unfair inequalities, *c)* if it would be harming to other federal law when the states themselves would have the executive power, or *d)* when the policy might raise severe conflicts between the mutual states. In practise the federal governments use as much as possible their authority, which makes the states mainly responsible for their internal administration - which differs strongly between them -, culture, police, regional planning and economy and parts of health and education policy. The outcome is diverse, which is also caused by the different historical backgrounds and traditions of the states, especially in Germany. This goes beyond the differences between former Western and Eastern Germany. In
Germany there are two kinds of states: free city states (the Stadtstaaten Bremen, Hamburg and Berlin) and Fläche staaten (‘area states’), ranging in area of 2570 km$^2$ (Saarland) to 70,554 km$^2$ (Bayern (Bavaria)). Especially the largest states and their political leaders are playing a role of importance at the national level as well. The 9 Austrian Bundesländer vary both in population and areas as well, as there are the capital of Wien (Vienna), the relatively small states of Vorarlberg and former Hungarian Burgenland (with the size of an average European county/province) and large states like Steiermark (Steyria) and Niederösterreich (Lower Austria). In practise the Austrian federal system is obvious weaker than the German one, since the most important fields of legislation are explicitly attributed to federal decision-making. At the same time is the financial administration an exclusive federal responsibility, causing a stronger dependency relationship than in Germany or Belgium.

The present system of Belgium is in essence similar to the other two federal systems, however it is much more complex. First of all, there are two separate divisions of the national territory. The first one is pure of territorial nature: there are the three Gewesten/Régions, the regions Vlaanderen (Flanders, 6 million inh.), Wallonie (Wallonia, 3.3 million) and the Capital District of Brussels (1 million). All these three regions have their own competencies and government. Next to this, the country is divided into three (cultural) communities, grouped on their mother tongue: the Flemish/Dutch community (approximately 60%), the French community (approximately 39%) and the German community (ca. 0.5%, ca. 50,000 people near the German border living in some former German settlements). The division of belonging to a community however does not depend on one’s language, but on the territory one is living: the population of the provinces in Vlaanderen automatically belong to the
Flemish/Dutch community, the population of the provinces in Wallonie belong to the French community\textsuperscript{8}, except for the municipalities that belong to the German community, the so-called Ost-Kantons. In Brussels, the population can choose to which community it wants to belong. All the three languages are official in Belgium and there are dozens of acts protecting the rights of using the language.\textsuperscript{9} The three communities have their own representatives and government, which for the Flemish/Dutch community merged with that of the region of Vlaanderen. The result is even for Belgians difficult to understand, however generally spoken it satisfied most of the parties and seemed to be the only solution to maintain the country as a united state. To summarize, the central government is mainly responsible for the police, defence, international relations and the inter-regional and inter-communal affairs. The regions are without interference of the state responsible for regional planning and economy, tourism, infrastructure, environmental policy, housing and internal administration. Finally, the communities are especially the legislative and executive institutions for culture, education, personal affairs of citizens and the co-operation with the regions and neighbouring countries (France and Luxembourg, Germany and The Netherlands respectively) in the field of their tasks. For this reason, there are no ministers for the tasks of the regions or communities at the national level of Belgium, but only at the regional and community governmental level respectively.\textsuperscript{10}

A different case is Spain. After the reestablishment of the kingdom reigned by a king in 1975, it was decided to give special autonomy to the distinct regions of Cataluña, Galicia and País Vasco (Basque County) that enjoyed a special status in the past as well. But this raised the question of forms of autonomy to other regions that claimed to have the same special rights, based on their characteristic culture, language
or geographical location. After opening the gate for Andalucía and later the Islas Canarias (Canary Islands), also Aragón and others asked for the same treatment. Finally it was decided in the early 1980s that, after a period of five years, all the 17 autonomous regions (comunidades autónomas) were given the same rights. Special legislature gives some rights to Ceuta and Melilla, two small Spanish exclaves in Northern-Morocco. The result is a system that resembles the federal German-Austrian one to a high extent, although there are differences, at least in theoretical (legal) base. In federal countries the tasks of the central government are limited enumerations. If not mentioned, the task is automatically the task of the region. In Spain at least in theory the tasks of the state are limited as well, but for many affairs the rule is that there are possibilities for the regions to take over the responsibility, until then they are national affairs. Despite the expectations of the legislator, the practise is that the states took as much responsibility as possible, especially in (European) regional policy. The policy fields are roughly the same as in the federal countries. Although another difference is that the role of especially small regions like La Rioja, with only a quarter of a million inhabitants, at the national political level is marginalized.

Italy shows a mixed system. Of the 20 regions there are 5 with a special autonomous system that is quite equal to the discussed Spanish system. For the islands of Sicilia and Sardinia, as well as for the multilingual regions of Trentino-Alto Adige, Friuli-Venezia Giulia and Valle d’Aosta/Vallée d’Aoste there are special legislative authorities with exclusive autonomous power, mainly in the fields of healthcare, internal administration, regional planning, housing, public transport, agriculture and job creation. The exact topics and responsibilities differ from region to region and are defined by special statutes. The reason is mainly of cultural and historical art, and tried
to take away the demands for independent nations, most notably in Northern Italy. The
difference between the regional tasks caused sometimes problems, e.g. with co-
operation with the EU, causing confusion about the responsible government. For the
other 15 states in Italy, their regional power is much weaker. For roughly spoken the
same tasks as the five special regions they can be responsible, but not exclusively. Only
when national law delegates tasks or when regional policy would not harm national
policy, they can use their executive power, always subject to control of the state. Partly
because of the short terms of most of the Italians governments there have not been
made detailed regulations on the division. Anyhow, the legislation, execution and
implementation by the regional authorities did and do offer some stable balance to the
‘dynamic’ (instable) national governmental policy.

For the other EU countries - with the exception of the special statuses of
Madeira, the Açores and Åland - there are no real regional powers for a broader spectre
of subjects at the first tier of meso government yet. In France the 22 regions with an
elected board execute tasks both by deconcentration and decentralization, although the
responsibilities are mainly limited to regional policy on economical planning and social
development. In Portugal there are 5 special boards for regional development and
economical planning. The same is the case for Greece, where the 13 quite successful
peripheries consist of groups of provinces that originally were established for the
regions Makedonia & Thrakia and the Aegean Islands. Now the whole country is
divided and each of these regions has a board that advises the national government for
the regional development plans and related economical subjects. Its members are
representatives of the provinces, the larger towns and cities and unions of local
governments. Mainly economical or planning tasks are performed by regional institutional boards in *Finland* and *Sweden*.

### 3.2 Second tier of decentralization: the county/province

In most of the member states there exists a form of meso level government, situated between the national - and regional - and the local level. Although their names vary (e.g. *amt, län, fylke, nomos*) generally they are described as province, county or *département*. Their tasks and legislative and executive power differ between the countries.

Generally spoken the strongest counties/provinces can be found in decentralized countries. Here they normally are the first tier of meso government, thus linking the local and central levels. Except for deconcentrated tasks, they also have legislative power for decentralized policy. In those systems they control local governments. In *The Netherlands* and *Sweden* the provinces have quite a wide range of tasks apart from the co-ordination between the municipalities. They include infrastructure, regional planning, healthcare, culture and environmental protection. In smaller countries like *Denmark* and *Ireland* the province is not really represented at this level; its functioning is better fitting the description of the next tier of government. In the latter country there are however regional authority regions that focus on regional development and planning, comparable with the same institution at the regional level in larger countries.

In *federal* or *regionalized* countries normally the region performs the above-mentioned tasks, or they are found at the next level. A strong provincial level would in those cases come too close to the upper tier. For this reason the position of the provinces\(^{14}\) in *Italy* and *Spain* is probably weaker than in e.g. *The Netherlands* and
Sweden, dealing with policy on education, welfare and infrastructure. In Spain there is the odd case that certain regions consist of only one province, the comunidades autónomas uniprovinciales. In these cases the province only exists virtually, the regional government executes its tasks. In Germany only the larger states are divided into Regierungsbezirke, originally a little bit comparable with the county/province. Their functioning is depending on the administrational system of the state, which is diversified. Their present tasks and functioning is partly one of control and for regional planning within the state. On the contrast with the previous countries we find Belgium, where the provinces are quite well comparable with those in The Netherlands. Contrary to the other federal countries do the young federal Belgian bodies not have the same tradition, resulting in the fact that the older provinces could to a high extent keep their original responsibilities; the growth of the regions and communities was mainly on the cost of the central level.

In centralized countries like France this level of government (département) is indeed more important probably than the regional level, their tasks and responsibilities however are still mainly forms of deconcentration, related to many subjects like for the provinces in other countries. The decentralized responsibilities for which they have own legislative power are rather small. In Greece the same used to be the practise until two decades ago, when the system changed and much more competences were given to the nomoi. The present situation resembles that of most of the decentralized countries, since the provinces are responsible for parts of welfare policy, healthcare, public transport, culture, planning, environmental protection, agriculture and fishery, education, sport and industry, although there is still control by the central government.
In Portugal, Scotland, Wales and Northern Ireland the counties or districts were abandoned in the most recent structures and this level of government is so to say absent. In England there are two kinds of counties, the metropolitan (which are single-tier local governments for cities and agglomerations) and non-metropolitan counties. The latter ones are not really a second tier of decentralized government comparable with the other member states. They are generally spoken responsible for all decentralized tasks together with the local governments. The division is normally that the larger and more expensive projects and tasks are performed by the counties, the other ones by the local ‘lower tier authorities’. In practise, the county is performing policy on welfare, main infrastructure, planning, education, culture (libraries, museums), consumer protection and police and fire brigade, etcetera.

3.3 Co-operation among local governments

In almost all the member states exists the possibility for voluntary co-operation among local governments, normally for one or more tasks. These co-operations are in many cases not structured, but rather ad hoc. As a contrast to this phenomenon, there are countries in which the co-operation among the lowest level of government is obligated. We can find this system normally in countries with small local governments (a fragmentised self-government structure) and / or in countries with a weak administration at the level of the county/province. Originally this was for a number of states the ‘district level’, which was abandoned in most of them.

Perhaps the most classical form is the German Kreis, a joint connection of several municipalities (which on their own can consist of several villages as well). They
co-operate on larger scales of tasks and for fields as tourism, planning and infrastructure they have decisional power in some cases. Perhaps the most visible is their responsibility for issuing license plates for vehicles. After all, the position of the Kreise is quite strong. Larger towns and cities, the Kreisfreie Städte, can decide not to join such a ‘circle’. Besides the advantages of being more independent, the disadvantage is that it is much harder to influence the policy of neighbouring localities. In Austria the system of the Bezirk is practically the same. Here the larger towns and cities are an own Stadtbezirk, while their surroundings are the Umgebungsbbezirke.

In Denmark we can find the amtskommuner, or just amter. In some respects they could be considered to be small provinces, sometimes consisting of a single or group of islands. However, their legal status is more like a municipality, with more competences, making the outcome to be somewhere between a county/province and a Kreis. Their tasks are mainly controlling and stimulating co-operation between municipalities, in many fields of policy.

In centralized countries with small municipalities we witness the existence of unions of municipalities as a grouping with an own executive board, controlling the local governments and being responsible for co-operation. The distinction from many other states is their obliged character: municipalities are not free to choose but are always consisting of the same localities. In Luxembourg the 12 cantons and in Greece the koinotites function roughly the same as the systems mentioned above, with the difference that on average they are smaller, both on area and population. In Greece, towns and cities, the demoi, are not necessarily grouped into units, but perform these tasks on their own. However, in decentralized countries, like The Netherlands, in
general the local governments are rather are free to choose their partners. This system is also very common e.g. in the United Kingdom and the United States as well.

The structure on the British islands and Portugal is that the ‘district level’ is the real local government now, while the settlements or neighbourhoods are of minor importance. Finally there are special boards for co-operation on economical planning and regional development at the district level, as e.g. in Ireland and Finland.

3.4 Local governments

3.4.1 Classification

It would be by far too detailed discussing the exact tasks and differences of the local governments in this volume. Therefore, some general principles will be mentioned. First of all the number of tasks and real power in practise of the local level of government is highly related to the size of their population. It is interesting to think of what was first: larger communities or decentralization, making the merging of local governments practically necessary. The two ways influenced each other, in the sense that in countries with a higher average population for settlements there was more debate on enlarging the number of tasks of the local governments, while once more tasks where to be given, there was a need for larger municipalities as well. Starting early, but taking a high flow from the 1960s/70s, the restructuring of local government was a topic in almost each member state. This was stimulated by the fact that society and the governing of that society were getting more complex, which required more efficient and practical solutions, e.g. for agglomeration problems. Besides, the debates on democratisation were of significant influence. Generally spoken there were two options: enlarging the
municipalities by mergers or establishing an additional level of local government. The final outcome was influenced by the centralized or decentralized system of administration and by its nature did influence the national administrative structure vice versa.

Often books (e.g. Norton, 1994) tell that in Southern Europe we can find the small, fragmented structure of local governments, with only limited tasks, where in North-Western Europe there are large municipalities. Roughly spoken there is some sense in this classification, nevertheless Figure 2 shows a more diversified division. For the sake of comparison and in respect of the recent enlargement, the table includes the ten new member states, offering the most actual situation. However, in connection with the previous sections, the discussion below is only concerned about the EU15, since for the new member states practically all of them in one way or another fit to one of the described archetypes.

In general, the enlargement showed an increase of the weight of highly fragmentised and fragmentised structures. The grouping was made by the author, based on the average number of inhabitants. In general, a “dwarf local government structure” means that the far majority of local governments consist of very small communities, making virtually each settlement self-governed. Also larger cities might be divided into self-governing districts. In countries with a “small village self-government structure” some very small settlements belong to a neighbouring village and besides the number of scattered, dwarf villages is smaller on the total number, partly due to settlement patterns. The more structured “small town and joined villages self-government structure” normally means the joining of a number of small villages with a nearby town or larger village, creating on average municipalities between 10-25,000 inhabitants. In
the highly structured “small regional self-government structure” the amalgamation is even bigger, sometimes consisting of over 25 settlements and an enormous territory, or is the result of a higher national percentage of urban population, combined with its neighbouring villages. In the “regional self-government structure”, typical for the British Islands, the local government is comparable with the district level in many other countries, e.g. the *Kreis* in Germany or *Bezirk* in Austria.

It has to be noted that the classification is based on averages, meaning that at the individual level there might be huge differences. For the EU25, in 2004 there are 94,492 local governments (compared with 77,555 for the EU15). On a population of approximately 454 million, this results in an average of 4,805 (very close to the average of the EU15, being 4,890). It is true that this number is to a high extent defined by the enormous number of relatively small French, German, Spanish and Italian governments. For that reason, an un-weighted average over the figures of the 25 member states was counted as well, resulting in a union wide average of 19,371 inhabitants per local government.
<table>
<thead>
<tr>
<th>Country</th>
<th>Number of local governments</th>
<th>Average population (2004)</th>
</tr>
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<tbody>
<tr>
<td>&quot;dwarf local governments structure&quot; (highly fragmentised)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cyprus</td>
<td>616</td>
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<td>&quot;small village self-government structure&quot; (fragmentised)</td>
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<td>5,543</td>
</tr>
<tr>
<td>Malta</td>
<td>67</td>
<td>5,985</td>
</tr>
<tr>
<td>Germany</td>
<td>13,176</td>
<td>6,268 *</td>
</tr>
<tr>
<td>Italy</td>
<td>8,100</td>
<td>7,077</td>
</tr>
<tr>
<td>Lithuania</td>
<td>446</td>
<td>8,056</td>
</tr>
<tr>
<td>&quot;small town and joined villages self-government structure&quot; (structured)</td>
<td>521</td>
<td>19,867</td>
</tr>
<tr>
<td>Slovenia</td>
<td>192</td>
<td>10,229</td>
</tr>
<tr>
<td>Finland</td>
<td>446</td>
<td>11,673</td>
</tr>
<tr>
<td>Poland</td>
<td>2,486</td>
<td>15,539</td>
</tr>
<tr>
<td>Belgium</td>
<td>589</td>
<td>17,582</td>
</tr>
<tr>
<td>Denmark</td>
<td>271</td>
<td>19,867</td>
</tr>
<tr>
<td>&quot;small regional self-government structure&quot; (highly structured)</td>
<td>521</td>
<td>30,831</td>
</tr>
<tr>
<td>Sweden</td>
<td>290</td>
<td>30,831</td>
</tr>
<tr>
<td>The Netherlands</td>
<td>483</td>
<td>33,526</td>
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<tr>
<td>Portugal</td>
<td>308</td>
<td>33,792</td>
</tr>
<tr>
<td>&quot;regional self-government structure&quot; (district structure)</td>
<td>521</td>
<td>33,792</td>
</tr>
<tr>
<td>Northern Ireland</td>
<td>26</td>
<td>57,692</td>
</tr>
<tr>
<td>Ireland</td>
<td>34</td>
<td>116,588</td>
</tr>
<tr>
<td>Wales</td>
<td>22</td>
<td>127,272</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>443</td>
<td>134,086</td>
</tr>
<tr>
<td>Scotland</td>
<td>41</td>
<td>136,583</td>
</tr>
<tr>
<td>England</td>
<td>354</td>
<td>139,831</td>
</tr>
<tr>
<td>EU25 (total; average counted as EU-population / Σ local governments)</td>
<td>94,492</td>
<td>4,805</td>
</tr>
<tr>
<td>EU25 (average counted as Σ national averages / 25 member states)</td>
<td>19,371</td>
<td></td>
</tr>
</tbody>
</table>

(*) National average, large differences between the states.

Source: Counting of the author, based on information of Eurostat and the respective national statistical offices.
3.4.2 Description of tasks and power of local governments

In centralized countries the municipalities are very or rather small. The result is a highly fragmentised structure in Greece, France and Luxemburg, where normally each settlement is an independent village\textsuperscript{17}. However we can find the same in non-centralized countries like Austria, Italy and Spain. Germany is a special case, since the internal administration is here, like in most federal countries, the competence of the states. The outcome differs strongly in the country (e.g. an average population of 43,000 in Nordrhein-Westfalen (North Rhine-Westfalia), opposed to 1,460 in Brandenburg), where there is an obvious geographical division, making most of the northern part belong to the North-Western European structure and states like Bayern (Bavaria) and Baden-Württemberg to the South European sphere.\textsuperscript{18}

In general the competences of local governments are \textit{de iure} different between the countries, as in France for example the tasks are rather limited by law, where as in Germany the municipalities are competent of everything that is not regulated by other levels of government. In practise though the result is quite the same, meaning that the responsibilities, whether they are their own legislative authority or the execution is delegated by a higher body, are rather small, including local infrastructure, local culture and sometimes primary education. Other policy is made by the union of local governments (‘district’) or in co-operation. The mayor is normally only working part-
time, with a limited authority - as maintaining local order - and mainly ceremonial tasks. Larger towns and cities normally have more competences.

In decentralized countries are the on average larger municipalities responsible for a wide range of policy fields, normally more than in other systems. The average number of population in these countries depends partly on population density, however a certain number of inhabitants (as e.g. 10,000 or 20,000) is considered to be required to perform tasks effectively (for a very interesting discussion, see e.g. Redcliffe-Maud, 1969 and Wagener, 1974). This led especially in Finland and Sweden to municipalities of huge areas or municipalities at the countryside, sometimes consisting of over 30 settlements, like in The Netherlands or Portugal. In these countries there is on general no (obligatory) co-operation between the municipalities, they perform most of their tasks themselves. In Belgium, Finland, Sweden, Denmark, The Netherlands and Portugal, the responsibilities include local land-use planning, housing, primary education, infrastructure, local environmental policy (including garbage collecting), healthcare (sometimes), police (sometimes), fire protection, local economy, welfare, culture and tourism. Added to this is a range of tasks delegated by higher levels of government, in some cases in deconcentration, as explained in the next section, which makes the local governments the second most powerful ‘player’ in the national political arena. The provinces’ power is smaller, although in most countries it controls the municipalities.

The third system is typical for the United Kingdom - where public administration differs between the four parts - and Ireland. The enormous local governments are for a great amount of cases the only decentralized organs. These local ‘individual unitary
authorities’ replaced in many cases the former districts, except for Northern Ireland, where they are still in function (in name), but now as local governmental bodies. In Ireland they simply replaced the counties\textsuperscript{19}, giving these county rights to the largest towns also. For cities and their agglomerations they perform most of the tasks on their own. In rural areas, as explained before, the competences in the UK are divided between the higher level of the county and the local governments, the latter being responsible for the smaller tasks, in practise this means housing, environmental health, building regulations, local infrastructure and industry and garbage collection. Copied from American experiences, some of them are managed like an enterprise, with a city or town manager being responsible for daily affairs and execution, controlled by a board of representatives, that makes the – strategic - decisions. Since this created a centralized system at the local level, ‘far away from the citizens’, the units are divided in so-called wards, which have advisory and sometimes small executive powers. In Portugal the local municípios are divided by freguesias, which have roughly about the same function as their British and Irish counterparts.

3.4 Some remarks from practise: deconcentration and financial power

So far, public administration was discussed as the division of tasks decentralized to several levels of government. These competences are normally regulated by law and thus form the governmental ‘powers’ de iure. It should be kept in mind, that in practise some other matters, like deconcentration and authority over financial resources, influence the division of power de facto.
In all member states we can find forms of *deconcentration*, the execution and
implementation of national policy at a lower level than the central state, by
representatives of the national government. The reason for choosing this instrument is
normally the desire to undertake functions that should be uniformly realized towards
everybody, unrelated to their place of residence. This combines the advantages of
equality with those of efficiency and local knowledge (Szabó, 1993; Pálné, 2001).
Sometimes there are own offices or bodies of a ministry spread over the country; in
other cases the tasks are performed by the lower levels of government in name of the
central government. Especially in centralized countries, with a poorer developed system
of decentralization this instrument is commonly used. For example the *French régions*
and *départements*, the *Spanish* and *Italian* provinces and regional and local authorities
in *Denmark, Greece* and *Ireland* perform for several fields of policy more tasks as a
*deconcentrated* body, than that they have own competence to decide on the legislature.
For these tasks normally a representative of the state, like in *France* the *préfet*, is
responsible for the control and implementation. Another option for deconcentration is
the establishment of a large number of semi-public state bodies, responsible for only
certain tasks. An example from *Ireland* is the general presence of *state sponsored*
*bodies*, which perform most of the tasks at the meso level.

Even when a government possesses legislative and legal decisive power, this
does not necessarily guarantee a strong performance in the political *arena*. If sufficient
financial resources are lacking, the lower tier of government is still dependent on the
higher one. According to some constitutions, each delegated or fully decentralized task
necessarily requires financial support for the lower governments, but in practice many
municipalities, provinces or regions seem to have to beg for receiving the funds. This
counts especially for centralized countries and countries with a high percentage of central tax collection. Only in very few countries are the own regional - not to mention the local - tax revenues sufficient for all its tasks. Partly for reasons of leveling down regional differences in development, the central government normally re-divides the yields of taxation, giving the central government strong power for control of and interference in regional and local policy.

4. Centralism, regionalism, localism: some tendencies in administration

The discussed systems of public administration in the EU15 show a varied landscape of options, as diversified as the union itself. There is no common structure, neither in statistics nor in administration, though there are some tendencies that seem to be universal, structuring the directions of more recent changes.

First of all and especially since the last three decades practically all of the member states witnessed processes of decentralization and regionalism. The system of strong centralization with deconcentration at lower levels has decreased in popularity. Especially in historically heterogeneous countries regions were established, which were given competences in a varying range of policy. This was partly the result of changes in political situation, the discussions on increasing democratization and the demands for regionalism in some states, which influenced other countries. All in one, a more complex society required specialized, flexible and efficient solutions, which resulted in
the increase of local power as well. In some countries this was accompanied by restructuring the local level of government, resulting in large municipalities. At the same time it was generally considered that regionalism and localism, in the sense of increasing the political power of those institutions of administration, could form a balance to the strong central government and the European dimension of legislation.

The increase of EU policy undeniably influenced the national systems of public administration. First of all lower governments, most notably the meso levels of ‘regions’, were favoured for being the beneficiaries of regional development funds. This raised their political existence; in some cases it even meant the most important opportunity for establishing a regional tier in a nation’s administrative system. Besides, the participation in the EU raised the interest for other states’ governmental structures. This resulted sometimes in converging solutions, since all states after all had to solve about the same problem of efficient, democratic and fairly accepted governance, within the borders of their specialties and traditions.

Together this made all units part of a larger whole. Notions as ‘the world as a village’ have been meeting increasing acceptance. The local settlement is not standing alone; it is a player in a large spectre. This increased ‘foreign’ influences, from the national state, Europe, etcetera, resulting to ‘globalism’. The above-mentioned tendencies of increasing local power are part of a wider phenomenon called localism. These two partly opposing developments are two sides of the same coin, which could be referred to as ‘glocalism’. Altogether it shows a highly dynamic situation. With the recent entry of 10 new member states with their own traditions and cultures a new dimension is added to this, on its turn reshaping the spectre again.
REFERENCES

- EUROSTAT Webpage: http://europa.eu.int/comm/eurostat
ACKNOWLEDGEMENTS

Throughout the text of this article, especially as far as Spain, Germany, Denmark, the United Kingdom of Great Britain and Northern Ireland, Italy and Greece are concerned, the book of Prakke et al. (1998) was very useful for some historic backgrounds, introduction and overviews. Unfortunately, this work on the State & Constitutional Law of the 15 (older) member states is available only in Dutch language.

NOTES

1 Translated from German by the author of this article.
2 For anyone who is interested in some of the new systems, the extensive book of Horváth (2000) is useful.
3 Mainly at the local level.
4 There are special regulations for the so-called PTOMs, semi-independent parts of the French Republic in the Indian Ocean and the Pacific, however these are not part of the EU either.
5 It has to be admitted that the advisory competences of the regional peripheries and increased responsibilities of the provinces changed the system in a way that Greece is not the most typical example of a centralized state anymore; however, there are no really (semi-)autonomous institutions, besides the competences of the local governments are very small.
6 Although the influence of the state in the whole Austrian society might be bigger than in Germany. Besides, mainly due to their size, many German states have more influence on national politics than the smaller Austrian Bundesländer, whose real decisional power in practise is smaller than their German counterparts. Further on, there are similarities between Germany and Austria on one hand and Switzerland on the other hand.
7 And capital, however only Wallonie decided upon making the relatively unimportant town of Namur the seat of its parliament. For Vlaanderen Brussels is the capital as well.
8 For this reason, the former province of Brabant was divided in two pieces: Vlaams-Brabant and Brabant-Wallon.
9 As e.g. in official bilingual Brussels and the Flemish enclave Voerstreek in Wallonie and the Wallon enclave Comines-Warneton in Vlaanderen (with a mixed population).
10 The fact that the system sometimes leaves certain tasks to be at the mutual responsibility for both federal and regional government at the same time, without the possibility to overrule or make a final decision, causes impasses; this was quite recently the case, concerning the number of night flights, causing a serious governmental crises.
11 A lot of debates have been held in Spain on the huge, formal regional delegations of regional governments to Brussels, passing by the central government.
12 Over 50 within in a period of half a century between 1947 and 1997.
13 Only to the island of Corse (Corsica) there were given some additional responsibilities.
14 In Spain and Italy all the provinces are named after their capital, where as in most other countries they are normally having historic geographical names.
15 Although here exists the possibility for splitting a Bezirk partially for certain tasks in politische Exposituren. An example is the nation’s largest Bezirk, Liezen, where in Bad Aussee and Gröbming a small dependant office regulates practical things (which increases the accessibility for citizens).
16 The whole country is divided into amter, except for the capital and Frederiksborg, a political independent town, geographically part of and totally surrounded by København (Copenhagen).
17 In some countries there is a minimum population (100, 250 or 500) required for enjoying independent status.
18 Rheinland-Pfalz (Rhineland-Palts) in Central-Western Germany shows the most fragmentised structure, but this area is bordering France. Nevertheless, Saarland is bordering France as well, but here are - partly due to urbanization - the local governments rather large, which shows the autonomy of the states.
19 Except for the historical largest rural county of Tipperary, which was split into two parts.