

in brief...

# How citizens help expose environmental wrongdoing

Does enabling citizens to complain about public services provide an effective way of improving government services, or should we be concerned about the accuracy and reliability of such reports?

**Jonathan Colmer, Mary Evans and Jay Shimshack** find that complaints about environmental quality are linked to an increase in an investigation being carried out – and far more likely to uncover harm to the local environment than routine investigations.

Citizen complaints feature prominently in the oversight of public services ranging from policing and corruption to environmental protection and occupational safety regulation. Complaint schemes are a way for citizens to provide information about a specific environmental, health or safety concern directly to a regulatory agency, typically at any time of the day or night, online or by phone.

Those who support citizen complaints argue that they help to improve transparency and promote government accountability, and that procedural justice is enhanced by allowing individuals to participate directly in decisions that influence their families and communities. Complaints may improve regulatory efficiency if local people have better information than officials, especially if they draw attention to concerns that would otherwise go undetected.

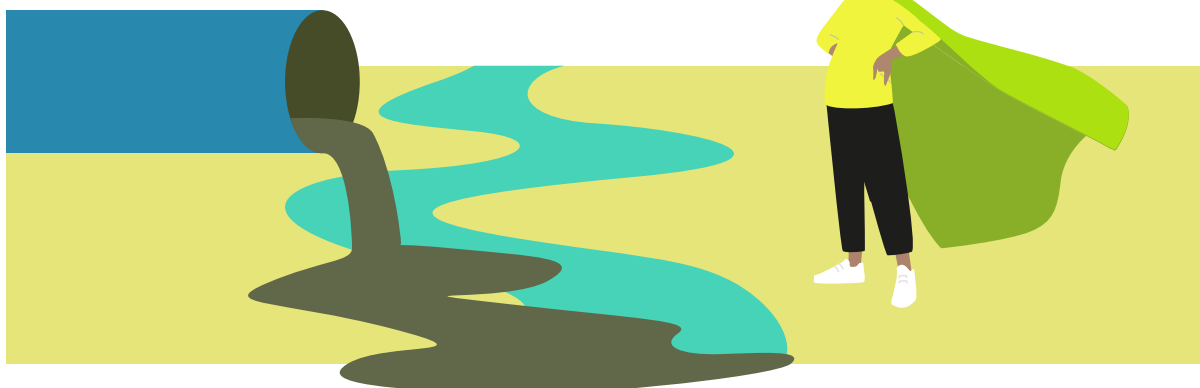
But citizen complaints may not always be reliable and may reallocate limited monitoring and enforcement resources away from more harmful problems. There is, of course, no guarantee that public complaints are accurate or address significant concerns. In addition, citizen

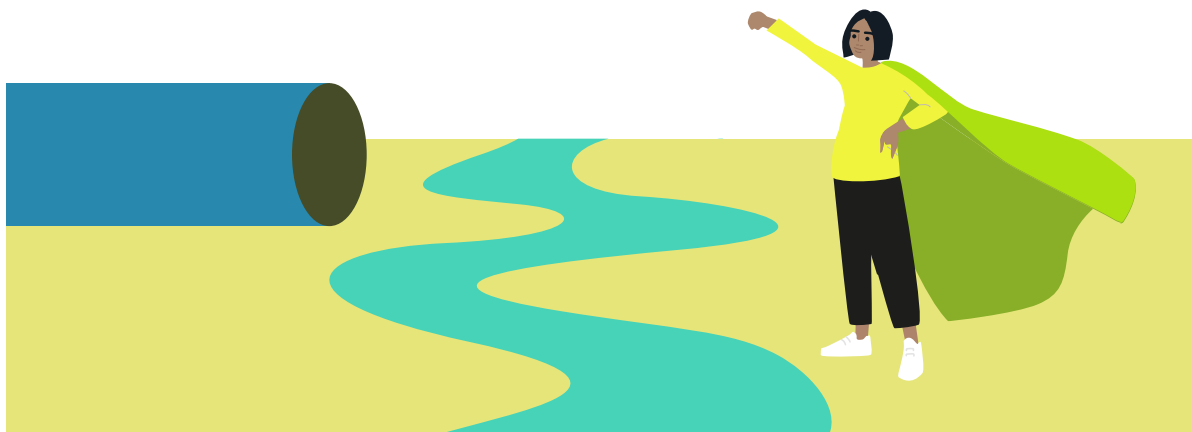
complaints could reduce procedural and distributional justice if there is an unequal regulatory response to complaints across income, race or other factors.

Despite theoretical ambiguity and policy prominence, the nature and effects of citizen complaints are poorly understood. In a new study, we provide new facts on public attitudes and new evidence on the efficiency and distributional implications of environmental citizen complaints.

A natural starting point for exploring the potential advantages and disadvantages of citizen complaints is simply to ask people about their attitudes towards such complaints. With this in mind, we conducted a nationally representative survey of US residents. This survey evidence reveals that, on average, the public believes that reports of pollution concerns promote environmental justice, improve public transparency and accountability, and provide high-quality local information. On average, the public does not believe that citizen complaints waste public resources or allow environmental activists and NGOs to have undue influence on environmental agencies.

The public generally backs citizens reporting pollution concerns – and does not believe that they are wasting public resources





While survey evidence helps to inform attitudes towards complaints, it cannot reveal whether complaints genuinely affect the efficiency and equity of environmental regulation. For this we need more formal analysis. We therefore explore if and how environmental regulators respond to citizen complaints in the real world.

We combine data on all citizen complaints made to the Texas Commission on Environmental Quality between 2003 and 2019 with regulator investigations, notices of violations and notices of enforcement at more than 23,000 Texas facilities regulated under two Clean Air Act programmes.

We find that citizen complaints are associated with a very strong regulatory response. On average, complaints against a facility are associated with a nearly 75-percentage point increase in the likelihood of that facility receiving an investigation in the two months following a complaint, compared with the likelihood in the previous month.

Since investigations are typically uncommon — with less than 3% of firms receiving an investigation in any given month — these are big changes. We find that these results are driven by citizen complaints. We find no evidence that the regulatory response to a complaint is affected by the racial composition or income of the neighbourhood where the facility triggering the complaint is located.

We then show that the investigations triggered by citizen complaints uncover significant harm. Complaints against a facility are associated with significant increases in the likelihood of formal notices of violation and enforcement for up to four months after the complaint. Investigations associated with complaints are two to four times more likely to uncover violations than investigations not triggered by complaints. Violations detected during investigations triggered by complaints are more severe on average than violations detected through other processes.

Taken as a whole, these findings show that complaints play a significant role in pollution oversight. Citizen complaints are popular with the public. Citizen complaints do support the legal mandate of environmental agencies to uncover and sanction significant environmental violations and citizen complaints do not compromise equity.

Citizen complaints also appear to enhance regulatory efficiency. Put differently, the results are consistent with citizen complaints serving as an effective targeting mechanism. If complaint and non-complaint investigations have similar costs, our results are consistent with the regulatory “bang per buck” from complaint activities being considerably higher than traditional regulatory monitoring activities.

This article summarises ‘Environmental Citizen Complaints’ by Jonathan Colmer, Mary Evans and Jay Shimshack, CEP Discussion Paper No. 1903 (<https://cep.lse.ac.uk/pubs/download/dp1903.pdf>).

Violations detected during investigations triggered by complaints are likely to be more severe than those detected in other ways

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