Park, Susan, and Teresa Kramarz, editors. 2019. *Global Environmental Governance and the Accountability Trap*. Cambridge, MA: The MIT Press.

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In global environmental governance, *accountability* tends to be narrowly perceived in terms of correct behavior within the confines of already-given institutional choices. What if that's a trap? What if the environment keeps deteriorating and we waste our time arguing about how to improve the accountability of actors embedded in deeply unsustainable institutions?

Are the organizations governing the global environment accountable to the environment itself? Certainly not, as "the environment" is commonly not perceived to have agency (Gaia theory/beliefs notwithstanding). Instead, they are accountable to a whole array of different organizations and individuals. The perceptions of who ought to be accountable to whom, in what way, and in accordance with what procedures vary across different issue areas and actor constellations. Susan Park and Teresa Kramarz, the editors of *Global Environmental Governance and the Accountability Trap*, argue that the preoccupation with accountability focuses only too often on the narrow aspects of the implementation and performance of agreed procedures ("second-tier" accountability) rather than on the goal orientation and design of institutions ("first-tier" accountability). Given the ongoing worsening of the environmental crisis, for them, the preoccupation with second-tier accountability is insufficient at best and even runs the danger of distracting from the necessary deeper institutional reform. They lament the lack of feedback loops from second-tier accountability mechanisms and processes back to goal orientation and institutional design. Ideally, they contend, accountability norms and practices should be engaged to open up conversations and contestation about how to reorient governance institutions toward greater environmental effectiveness.

The authors advance acute reflections on the challenges and opportunities that governance in polycentric systems poses for accountability. Cristina Balboa shows how environmental nongovernmental organizations' mission to fight environmental

degradation first gets derailed by having to compete with a multitude of peers for limited resources and then becomes further complicated by the pressure to be accountable to an amorphous, ambiguous, and potentially open-ended set of stakeholders with no clear hierarchy for whose concerns should be prioritized. Lars Gulbrandsen and Graeme Auld locate the contestation around the accountability of the Marine Stewardship Council's (MSCs) "sustainable" fish certification procedures within a polycentric governance situation where the MSC interacts with state regulation, environmental activists whose ardent critique of an unsustainable fishing industry has induced demand for the MSC label in the first place, and alternative NGO approaches for shaping consumer demand into more sustainable directions.

The bracketing introduction and conclusion by the editors are thoughtful yet difficult and abstract. The chapters by Hamish Van der Ven and Cristina Balboa on "Private Governance in Global Value Chains" and "Participation Versus Performance: The Crisis of Accountability for Environmental Nongovermental Organizations" could easily stand by themselves and would make excellent additions to syllabi concerned with environmental certifications or NGOs, respectively. The chapter by Gulbrandsen and Auld could also serve as a general introduction to fisheries certification.

There are also empirically rich but dense and narrowly focused chapters on interstate emissions accountability in climate politics and on hybrid accountabilities in cooperative initiatives for global climate governance and illegal wildlife trade governance.

A reflection on the role of polycentricity would have been an interesting complement to Park and Kramarz's suggestion that accountability should ideally inform learning about institutional designs more appropriate for tackling environmental challenges. How can we expect assertions and refutations of accountability to generate learning and inform institutional design in settings with multiple and often competing actors? While the authors often focus on "voice," what is the role of "exit" (and competition)?

The editors' suspicion that excessive concern with accountability at the stage of implementation distracts from the need for more profound reform and thus institutional design seems warranted. Yet the authors themselves focus largely on second-tier accountability while its relation to first-tier accountability is often only fleetingly spelled

out. The problem is already embedded in the very accountability definition serving as a common thread throughout the various chapters, which characterizes accountability within agreed, specific frameworks rather than the situations typical for goal definition and institutional design. The chapters systematically repeat a definition of accountability by Grant and Keohane—"some actors have the right to hold other actors to a set of standards, to judge whether they have filled their responsibilities in light of those standards, and to impose sanctions if they determine that those responsibilities have not been met" (3). Arguably, this definition is likely to fix attention more on second-tier than on first-tier accountability, since goal definition and institutional design are political acts where appropriate standards of behavior still leave considerable discretion before constituents would be entitled to resort to formal sanctions.

The editors could have made a stronger case for the advantages of their constructivist framework, which only loosely brackets the various chapters, by clearly outlining how it helps to understand accountability relations better than other theoretical traditions, for example, the more rationalist institutionalist accounts associated with Robert Keohane, coauthor of the accountability definition that serves as a common thread throughout the various chapters.

This volume has achieved significant steps toward problematizing the relation between accountability mechanisms and environmental degradation. The individual contributions stay within the confines of an assessment of second-tier accountability and how it relates to first-tier accountability, however. That feedback loops from second- to first-tier accountability alone do not lead out of the "accountability trap" is clear. Park and Kramarz argue that accountability should be used "as a means of exposing the underlying politics of choice, learning and reconstituting [global environmental governance] to lead to better environmental outcomes" (220). Future scholarship should seek to empirically map the degree to which engagement with existing accountability mechanisms has indeed given rise to repoliticized institutional learning processes and resulted in improved environmental outcomes. A promising complementary exercise could also learn from the collected case studies by charting pathways toward greater environmental sustainability.