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ADMINISTRATIVE ORGANIZATION IN SEVERAL EUROPEAN STATES: TERRITORIAL LEVELS AND THE DISTRIBUTION OF COMPETENCES ACCORDING TO THEIR CONSTITUTIONS

Cristina PATRASCU¹

Abstract

The study of the organization and models of public administration in all their complexity has become more and more extensive and reached deeper levels of analysis and understanding. The European Commission has emphasized on various occasions the importance of knowing better the characteristic features of the public administrative systems of the member states in order to adopt and apply the necessary legislative acts, measures and strategies to ensure an enhanced coordination between the EU and its members. Although there is no single model of public administration or a unique administrative framework which is the same for all the EU countries, the EU makes efforts at coordinating and harmonizing both legislation and policies in the administrative domain. Its various actions point into the direction of encouraging governments to increase their efficiency and adopt the needed reforms to comply with EU's regulatory framework and policies but also to develop their administrative capacity.

The organization of local public administration, as the closest level to the citizens, is established in accordance with the principles of the fundamental law or Constitution and with the state's legislation. The analysis of these provisions reveals the existence of a great variety of modes of organization and of various ways of sharing the competences between the central and local levels of public administration. Despite this huge diversity, states can be grouped in several classes using the criterion of the levels of public administration and of the accomplishment of competences between these levels.

Keywords

Administrative organization; 'clusters'/ types of administrative systems; levels of public administration; competences.

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I. Introductory remarks on various typologies of administrative systems

The comparative study of public administration works with a set of concepts and tools that lead to the establishment of various typologies of administrative systems, according to a selection and combination of several criteria (from the many that exist). Grouping administrative systems into various 'clusters' or types has ever been a particularity of the comparative approach of public administration, as the increasing number of recent studies proves it. Such types and typologies can be found in a variety of studies, for instance, Kuhlmann and Wollmann (2019), Wayenberg and Kuhlmann (2018), Ongaro and Van Thiel (2018), Ongaro (2019), Massey (2019).

According to Kuhlmann and Wollmann (2019) and Massey (2019), there are three fundamental dimensions to be considered in a comparative approach, namely: the institutional dimension (that brings to the fore the 'macro-structure' of public administration, which is a 'multi-level' type of structure); the cultural dimension (emphasizes the importance of 'administrative' and 'legal' families, that are groups or clusters which are connected by a specific tradition and values acknowledged in the administrative system); the historical dimension (that concentrates on the differences existing in the evolution of public administrations along different stages and eras) (Kuhlmann, 2019: 181). These three dimensions generate several types or classes in which states can be grouped.

The 'institutional' criterion or dimension takes into account the 'constitutional framework' and 'institutional macro-setting' (Kuhlmann, 2019: 181) according to which 3 classes can be established, namely: federal systems, unitary-centralized and unitary-decentralized systems. The cultural dimension, in its turn, determines the existence of the following categories or types: the classic Continental European rule-of-law culture and the Anglo-Saxon public interest culture. For this criterion an important additional principle has to be considered, that is the principle or idea that the legal tradition of a country has a great influence on the administrative culture. Therefore, the scientific literature calls attention to the 'historically inherited legal traditions' of Western

Europe which are: the Common Law tradition, the Roman-French tradition, the Roman-German tradition and the Roman-Scandinavian

The third dimension brings into play the idea of significant changes undergone by the administrative systems along various time-periods and the differences between Western and Eastern European traditions. With regard to changes that took place in the administrative systems, the most conspicuous example to sustain the relevance of the historical criterion is the massive transformations occurred in the administrative systems of Eastern European countries after 1990. These countries (Romania included) have replaced a communist regime with a democratic one, therefore their administrative system is shaped by a different tradition than the Western one. This determines the existence of two models, namely the Western bureaucratic model and the post-communist model.

Using a combination of these dimensions, the European states can be classified into five clusters. The important remark to be made is that within each of these groups there are original combinations of the institutional, cultural and historical dimensions (Kuhlamnn, 2019: 182; Ongaro, Van Thiel, Massey, Pierre, & Wollmann, 2018: 11-12). The five groups are the following: Continental European Napoleonic (with a Southern subgroup), Continental European federal, the Nordic group, the Anglo-Saxon group and, finally, the Central Eastern and South Eastern European group.

There are scholars who further distinguish between several different traditions in Europe and establish the following types: the Germanic, Anglo-Saxon, Southern European, Nordic European and Central-Eastern European (Ongaro, Van Thiel, Massey, Pierre, & Wollmann, 2018: 11-12; Kuhlamnn, 2019: 182; Schwab, Bouckaert & Kuhlmann, 2017: 19-21), with the observation that Schwab, Bouckaert and Kuhlmann, (2017: 19-21), and also Bouckaert and Kuhlmann (2016: 10) introduced a distinction between the Central Eastern and South Eastern groups.

The typologies or clusters that gather the countries according to the specified criteria (or dimensions) are used as analytical tools in the comparative study of public administration and other related administrative phenomena. It may be stated that these aspects are very important when the researcher or practitioner in the field wants to find an answer to various problems or challenges and to establish a connection between the characteristic features of a certain typology of an

administrative system and the influence that this typology has on the performance of public administration institutions, administrative behavior, public relations or communication with the citizens. Current research in this field launches as a further direction of investigation the necessity to identify and gather empirical evidence to sustain the connection existing between a country's administrative profile and the daily workings and levels of performance of public institutions and authorities and of public servants' activities.

II. Local Administrative Organization: Categories of States according to their Territorial Levels

It is generally accepted that the 28 states (with the UK preparing to leave, but still member of the EU) are characterized by an extraordinary variety with regard to the organization of their local administrative systems. These local administrations fall, in their turn, into the 'six-types' classification scheme (presented earlier), namely: Continental European Napoleonic (with a Southern subgroup), Continental European federal, Nordic, Anglo-Saxon and, finally, the Central Eastern and South Eastern European group.

Within these groups, countries may be classified according to their tiers or levels of public administration. Whereas countries have their local public administration organized, in general, on more than one tier, with a municipal level and a county level above it, there are also countries where the local government has one single level (Ebinger, Kuhlmann, & Bogumil, 2019: 7). Taking into account the particularities of the territorial organization of public administration, it can be stated that the vast majority of the European states has two or three levels of public administration, with the exception of Portugal that has five levels and of other seven member states that have four levels (EUPACK, 2018: 12).

The organization of public administration on levels is a significant criterion for the comparative study of local governments and allows the researcher to establish similarities and dissimilarities between the states. The classification of the member states using the two criteria of 'structure of the state' and 'tiers of public administration' consists of several groups of European states, as in the table below.

Structure of the state	States with 2 administrative tiers: central and 1 local level	States with 3 administrative tiers: central and 2 down (regional and local) levels	States with 4 administrative tiers: central and 3 down (regional and local) levels	States with 5 administrative levels: central and 4 down (regional and local) levels
Unitary Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Greece, Finland, France, Hungary, Ireland, Lithuania, Latvia, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Sweden	Cyprus, Estonia, Finland, Ireland, Lithuania, Latvia, Luxembourg, Malta, Slovenia	Bulgaria, Croatia, Czechia, Denmark, Greece, Hungary, Netherlands, Romania, Slovakia, Sweden, UK	Austria, France, Germany, Italy, Poland, Spain	Belgium, Portugal
Federal Austria, Belgium, Germany				
Regional Spain (federal in practice), Italy ('regionalized' with trends of 'fiscal federalism')				
UK – federal in practice				

(Own elaboration, based on EUPACK, 2018)

A first remark to be made is that the existence of more than 3 levels of public administration is often a specificity of larger states, with the exception of the three smaller states, Austria and Belgium and Portugal, which have all 4 and, respectively, 5 levels. The existence of more levels of local administration in states that have a greater size is, certainly, more easily understandable. For instance, in Germany, a federal state with a great size, the organization of public administration on several levels is justified by the existence of several national states that form a new state, the federal one. Within each national state ('land'), there is a multi-level system of public administration and therefore the necessity of having all the communities' interests represented at all the levels of the federation. A complicated state structure requires that the best interest of local communities be served and solved in the best manner possible, and so the principles of local autonomy prove to be the most appropriate ones.

In smaller states, however, the existence of several levels of local administration is possible. Belgium, which is a small state, has 5 levels, whose existence is determined by the complex state structure. In Belgium there are 3 regions, established on territorial criteria and 3 communities (delimited on linguistic and cultural criteria). There is no perfect juxtaposition between the 3 regions and 3 communities, another aspect which makes Belgium an original political-administrative system. One more peculiarity is represented by the administrative organization of the city (and port) of Antwerp, where it has been established a 'district council' (on the basis of Article 41 of the Belgian Constitution).

In what Portugal is concerned, this state is often referred to as an administrative system with 5 tiers, one central and other 4 local levels, represented by two autonomous regions, Madeira and Azores, the districts, municipalities and parishes.

In the next subsection, the principles of the Constitutions and other legal provisions regarding the levels of public administration in various European states will be presented and analyzed, for a limited number of states, that were selected on the basis of their state structure (namely unitary, federal, regional).

III. Constitutional and Legal Provisions Regarding the Levels of Public Administration and the Distribution of Competences

Common aspects and principles and shared visions between various constitutional texts has become even stronger in recent times, so that there is a recognition of the existence of a body of 'International Constitutional Law' (Tschentscher, 2011: 2; Kleinlein, & Peters, 2018: 1). The notion of 'international constitutional law' is used to refer to norms of public international law with a constitutional character or function (Kleinlein & Peters, 2018: 1). It is also acknowledged that 'international standards have evolved over the last decades by ongoing development and synchronization of constitutional provisions' (Tschentscher, 2011: 2). A very good example of this evolution is represented by the activity of the European Court of Justice that relies on the principle of a 'constitutional consensus' between the member states.

Without entering too much into detail, since the discussion on the existence of a 'global constitutionalism' surpasses the scope of the present paper, we would only like to call attention to the existence of a growing body of research in the field of comparative constitutional law and other branches of public law. The importance of comparative studies is already established and recognized, as the necessity of strengthening coordination and consensus between various administrations within the EU is a priority of the political agenda of the European institutions. Moreover, a recent comparative study of the public administrations of the 28 member states emerged from the joint effort of several researchers under the coordination of the Directorate-General for Employment, Social Affairs and Inclusion of the European Commission, known as the EUPACK study.

The close analysis of the constitutional texts and other legal provisions offer valuable information about the organization of the public administration systems existent in the EU.

A. Federal states - From all the EU member states, federal states form a much smaller group than the unitary ones. Within this group, formed by other three countries (Austria, Germany and the non-EU Switzerland), Belgium has one of the most intricate modes of organization. In order to set up a federal structure, the state has gone through a long and laborious process of reform, referred to as the 'six' state reforms, in 1970, 1980, 1988-1989, 1993, 2001, and more recently

in 2012. After these 6 successive reforms, the text of the Constitution itself was modified.

At present, Article 1 of the Belgium's Constitution expressly provides that: 'Belgium is a federal State, composed of Communities and Regions', whereas Article 2 establishes which are these communities. The three Belgian communities are: the Flemish, the French and the German-speaking community, while Article 3 names the three regions: the Flemish Region, the Brussels Capital region and the Walloon Region. Article 4 of the Constitution states that there are 4 linguistic regions: the Dutch-speaking region, the French-speaking region, the bilingual region of the Capital Brussels and the German-speaking region, and it is very important to observe that the linguistic regions are not to be mistaken for the linguistic communities. The other levels of local administration are represented by the province (Article 5 of the Constitution) and the municipalities (Article 4, Article 7). For instance, Article 7 states that 'The boundaries of the State, the provinces and the municipalities can only be changed or corrected by virtue of a law'.

From the analysis of the Belgian Constitution, it may be clearly inferred that the first level of public administration, also known in the scientific literature as the 'central level or tier', is the federal level. Belgium gained its independence in 1830, and the state has become progressively a federal one, following the six state reforms. These reforms changed also the ways in which the powers of the state are exercised, in the sense that the federal level does not appear as the sole owner of these powers. A redistribution of the power to make decisions took place within the framework of the six consecutive reforms.

As a result, greater powers were attributed to the second level or tier of the Belgian federation, represented by the communities ('gemeenschappen'/'communautés') and the regions ('gewesten'/'regions'). This organization is the result of a state reform that followed two lines: one line related to languages or linguistic reasons and cultural aspects in general (which caused the existence of the three communities) and the second line, related to economic interests. The regions wanted to manifest their economic autonomy so that the reform had to take them into consideration and lead to the existence of the three regions that are similar (up to a certain degree) to the German 'länder' (German term used in the plural to designate the states of the German federation).

The third tier of government (administration) is represented by the 10 provinces ('provincies'/'provinces'), whereas the fourth and basic level is represented by the municipalities ('gemeenten' or 'communes'). There are 589 municipalities and they are very different in size. There is also a fifth level of administration that is the 'district' or the 'city district', a government level to be found within the city of Antwerp (Van Dooren, 2018: 43).

A fundamental aspect to be analysed and that is closely linked with the structure of the administrative system is the distribution of powers between these levels. The study of the complex Belgian multi-level structure, reveals that the top or upper level is occupied currently by the Federal State and the communities and regions that are on equal footing with the state. Although all of these entities exercise different powers within their established field of competences, the main idea is that, evidently, some of the traditional powers are still retained by the state. The federal level still holds 'the defining functions of the state', such as defence, justice, foreign affairs and police (Van Dooren, 2018: 44). Social security remains a big part of the federal responsibility, within a public insurance system, including healthcare, unemployment, vacation, social security funds, pensions. Public companies, like the railroad infrastructure and exploitation, the BPost or postal systems and also Telecom are of federal competence. The fiscal policy and fiscal administration (everything related to companies, persons, VAT, inspection) as well as, for their larger part, economic and labour regulation remain under the federal 'hat'. Under the same federal competence, stand representative national scientific and cultural institutions, many of them with their headquarters in Brussels.

The regions and communities have a wide range of competences, the most important ones being those in the field of staff, budget, education (higher and compulsory education) and welfare care (social housing, youth care, elderly care, nurseries, integration). Region still receive the largest amount of their funds from the federal government on the basis of a complicated set of criteria, but they also have been granted taxing competences in the property and road domains (Van Dooren, 2018: 44). The regions have also the power of supervision over provinces (that until 1993 were only under the supervision of the state), over communes and intercommunal utility companies (Belgium.be, Government, Regions, Competence, 2019).

The provincial administration has its own responsibilities in areas like: spatial planning and permitting, water policies, rural policies, tourism, culture and education. The provinces exert their competences in a way that complements the smaller municipalities and some of them try to establish 'area-based policies' with groups of municipalities (Van Dooren, 2018: 45).

The powers of the communes are extensive, within a system known as 'open task setting' (Van Dooren, 2018: 45), meaning that the communal councils have the competence to perform everything that is in the 'local or communal interest'. Thus, local councils can do anything in their domains of competence, which is different from the areas established for higher authorities. The communes have powers in domains like social welfare, public works, public order, education, housing. They also have to carry out the tasks that the higher authorities may establish for them. The higher levels, federal state, communities, regions and provinces have the power of supervision over the communes (Belgium.be, Government, Communes, Competence, 2019).

B. Regional states - Regional states are considered a category of political-administrative systems in which various structures of public administration, named either regions or communities, are granted a high degree of autonomy. These states are characterized as a hybrid type, in-between the unitary and the federal state structure, and it is considered that, sooner or later, they will have to choose between being a unitary or a federal state. The two states classified as regional (Ziller, 1993) or 'regionalised' are Italy and Spain.

Italy is a regional state characterised by accentuated federalizing trends (Cepiku, 2018: 496). Its regionalism knew a progressive and ascending trend after the Second World War, partly as a reaction against the strong centralisation promoted by the Fascist Regime.

The decentralization process was set up in motion in 1990 (when the election of mayors became direct) and reached its highest peak in 2009 with the Law 42 (regulating the principles of fiscal federalism, and further enhancing the degree of autonomy for regional and local authorities).

According to the Italian Constitution, adopted in 1947, the 'Republic is composed of the Municipalities, the Provinces, the Metropolitan Cities, the Regions and the State. Municipalities, provinces, metropolitan cities and regions are autonomous entities having their own

statutes, powers and functions in accordance with the principles laid down in the Constitution' (Article 114). At the same time, the laws passed in 2001 acknowledged the status of equal components of the Republic for local governments, namely municipalities and provinces, the same as regions and the central government.

Italy has 20 regions with different degrees of autonomy, therefore 15 regions have an ordinary status, whereas 5 have a special status which ensures more powers for them. The next level down is represented by the 103 provinces and 8088 municipalities (Cepiku, 2018: 496).

Regarding the distribution of competences, Article 117 of the Italian Constitution clearly states that the Regions have legislative powers: 'Legislative powers shall be vested in the State and the Regions in compliance with the Constitution and with the constraints deriving from EU-legislation and international obligations.' The Constitution also specifically provides the domains in which the State has exclusive legislative powers:

- foreign policy and international relations of the State, as well as the relations with the EU
- immigration, right of asylum and legal status of non-EU citizens
- security, defence and armed forces
- the currency, state taxation and accounting systems
- state bodies and relevant electoral laws; state referenda; elections to the European Parliament;
- legal and administrative organization of the State and of national public agencies; public order and security, except for the local administrative police;
- jurisdiction and procedural law; civil and criminal law; administrative judicial system;
- general provisions on education; social security;
- electoral legislation, governing bodies and fundamental functions of the Municipalities, the Provinces, the Metropolitan Cities
- customs, protection of national borders;
- standard time, statistical and computerised coordination of data of state, regional and local administration;
- protection of the environment, ecosystem and cultural heritage.

The regions, in their turn, have legislative powers in all the domains that are not expressly covered by State legislation. The

Constitution uses the notion of ‘concurring legislation’, stating that: ‘In the subject matters covered by concurring legislation legislative powers are vested in the Regions, except for the determination of the fundamental principles, which are laid down in State legislation’ (Article 117). The main areas in which the Regions have large competences are: international relations with other regions and with the EU, health, foreign trade, job protection and safety, large transport and navigation networks, urban planning, land development, agriculture, rural banks, civil ports and airports, etc. (Article 117 of the Constitution; CCRE, CEMR, 2016: 46).

The local levels of public administration have no legislative powers, but they have competences in a limited number of domains. Provinces, Municipalities and Metropolitan Cities have statutory autonomy that was recognized in 1990 and enshrined in the Constitution in 2001 (European Committee of the Regions, Divisions of Powers, Italy, 2019). Provinces have competences in areas like environment, transport and land use planning, whereas metropolitan cities and local municipalities have competences in education, environment, transport, urban planning, public and social services, traffic management, economic and social development.

The existence of legislative powers entrusted to the regions is a characteristic feature of the Italian administrative organization and it represents a significant difference as compared to the local collectivities in a unitary state. Another specificity is the presence of many imbalances, both horizontal and vertical, within the fiscal relations between the various levels of local public administration and between the central and the local levels. To address these issues, a number of legislative measures were applied by the central government. The so called ‘fiscal federalism’ was introduced by Law No. 42, of May 5th 2009.

In agreement with the Article 119 of the Constitution, this law introduces the principles of Italian fiscal federalism that should guarantee a higher level of revenue autonomy for regions and local authorities, while maintaining the progressivity of the tax system. The law also provides for the assignment of autonomous resources to municipalities, provinces, metropolitan cities, and regions, in relation to their respective competencies and according to the principle of territoriality. Another provision of the law ensures that regions and local authorities have the ability to “shift” taxes, although within the limits established by state law

(Cepiku, 2018: 502). By this law, the state tried to force regions and other local administrations to be efficient and to avoid their recourse to fiscal leverages in order to obtain financing. To apply the provisions of Law. No 42/2009, the government had to adopt eight legislative decrees, within 24 months (a period extended with six additional months) to provide the principles and the rules necessary for the fiscal federalism.

Another important line of events in Italy is represented by the process of reform of the administrative organization which intended to abolish the province as a level of local government. This reform started in 2013, continued in 2014 (with the entry into force of Law 56/2014) and introduced the metropolitan cities. These cities were meant to take on the main competences and functions of the abolished provinces. The fact is that some provinces continue to exist, nevertheless, and that local governments, under fiscal pressures, were unable to take over the provincial functions (Cepiku, 2018: 502). After a referendum held in December 2016, which rejected the measures proposed by the reform (that targeted also the revision of the Constitution), the situation became even more difficult. As a result, provinces continue to accomplish functions that should be carried out by the State and the regions without having the necessary resources. Moreover, the resources have been constantly cut by the State, which amounted to a total of EURO 5.2 billion cut between 2013 and 2017. This situation made the Italian Union of Provinces – UPI (Unione Province d'Italia) declare a state of emergency in February 2017 (Assemblea dei Presidenti, 2017: 6).

The institutionalisation of the Metropolitan Cities and the restructuring of the provincial level introduced by the Law 56/2014 are still in a transition phase. The tasks of the provinces and Metropolitan Cities are constantly changing to adjust to the local necessities and pressures and to respond to the difficulties raised by the transfer and rescaling of the competences from the Regional level (European Committee of the Regions, Divisions of Powers, Italy, 2019).

C. Unitary states – The administrative organization of unitary states is, in principle, less complicated than that of the federal or regional ones. There are, certainly, distinctions to be made according to each political and social context, but unitary states have a more simplified administrative structure. Greece, for instance, is a Parliamentary Democracy, according to Article 1 of its Constitution (adopted in 1975). Article 101 of the Constitution claims that: "The administration of the State shall be organized in accordance with the system of

decentralization'. In practice the supervision of the central government is so strong that the decentralised services of ministries and state agencies apply the law only after receiving detailed circulars with instructions from the ministers (Sotiropoulos, 2018: 395). The high centralisation of the system is further enhanced by the fact that every expenditure comes from the central government, whereas subnational administrative structures have only very limited resources and competences (Sotiropoulos, 2018: 396). This type of administrative organization makes local initiatives and, by extension, local autonomy, ineffective.

Other levels and structures of the Greek administrative organization are represented by seven decentralised administrations (branches of the central government), 13 regional authorities (created in 1986) and 325 municipalities. The seven decentralised administrations are based on Articles 102 and 103 of the Greek Constitution and on Law 3852/2010 (Sotiropoulos, 2018: 397).

The current number of municipalities is a result of merging 1034 municipalities in 2011, a merging that was considered necessary to 'create economies of scale, decrease local government expenditure' and set up local government units capable of absorbing the EU funds (Sotiropoulos, 2018: 396). This merging did not have the expected outcome, as there are other mandatory conditions missing, like for instance the necessary professional training and skills of public servants working at the local level of government.

Concerning the distribution of competences, although in theory the local levels of administration do have their own responsibilities, these are exercised under the strict observation of the central State. Sotiropoulos draws up a rather long table of such competences, for each level (Sotiropoulos, 2018: 397-399). For the central level, the author enumerates: defence, police, foreign policy, education (universities), primary and secondary education, science and research, regional development, tourism, family and child policy, water and drainage, public health, industrial development, commerce, labour relations, town planning, agriculture and fisheries, public protection, courts (Civil and Administrative Law Courts) etc. Almost the same set of responsibilities can be observed at the regional level (with the exception of courts) and even at the local level. The author explains in a note that this classification is its own creation and was based on 'the most recent compilation of very long and detailed lists of competences by the

Ministry of Interior' (Sotiropoulos, 2018: 399). However, these powers are not exerted in reality by the local and regional governments. There are some policy sectors where the implementation is transferred to the municipal level, and even less frequently to the regional one, but most powers are concentrated at the central level of government. This dependence of the local on the central government is accentuated by financial reasons, because the State is the collector of almost all tax earnings, and by political pressures and constraints. Political constraints and control manifest in the form of recurrent changes of the 'general policies' and 'specific regulations' applicable to the local authorities (Sotiropoulos, 2018: 396). There is also no regulation or other instrument to stop the central government from taking over a competence that has been established for the municipal or regional level. This 'over-centralisation' propensity of the main government cannot be diminished by bottom-up initiatives because these initiatives have often been unsuccessful.

Conclusions

The study of these three (highly) complex European political-administrative systems, belonging to different categories of states, respectively federal, regional and unitary, proves once again the great variety of their local entities. This variety is caused, for one, by the cultural and political inheritance of each country, manifested today as one of the types or models of public administration to which they belong, namely the Germanic, Anglo-Saxon, Southern European, Nordic European and Central-Eastern European (Ongaro et al., 2018: 11-12; Kuhlmann in Massey, 2019: 182; Schwab, Bouckaert and Kuhlmann, 2017: 19-21).

Then, variety and uniqueness result also from the ways in which today's political institutions and other public authorities and institutions interact and 'play' their role within the political-administrative systems. They can be 'honest' actors that 'play by the rules' (the case of Belgian federalism is a good example) and respect the domains and powers of their 'fellow' political actors (which is neither the case of Greece, nor of Italy – as it can be seen from the cases of the Italian provinces and the municipal and regional levels of government in Greece).

The 'centralising' tendencies manifested by some of the central governments (also the example of Greece which borders on 'over-

centralisation') are not new in the exercise of political and administrative power. Currently, the European administrations can be categorised according to the 'centralised' or 'decentralised' ways of exerting their authority. A distinction is made, for instance, between states that promote a 'centralised' (Bulgaria, Cyprus, Italy, Malta, Romania etc.) or 'decentralised' (Austria, Belgium, Denmark, Germany, France etc.) implementation of policies (EUPACK, 2018: 15).

The comparative study of local administrations across the European states proves to be challenging, yet very complex and interesting for the researcher. The interest is further intensified by the new directions in which the comparative approach can lead the scholar. Another compelling reason for this type of research and analysis is the growing importance of the European regional and local levels of public administration, whose impact on the citizens' lives is ever present and greater than before. That is why the knowledge of characteristic features of public administrations is promoted by the European Commission and other bodies (organizations like the Council of European Municipalities and Regions/CEMR).

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