**Review of Strategic Environmental Assessments**

**in EC Development Cooperation**

*Final Report*

*14 December 2010*

*“Neither the European Commission nor any person acting on behalf of the Commission is responsible for the use which might be made of the following information”*

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# List of acronyms

**ACP** African, Caribbean and Pacific countries

**AMSP** Accompanying Measures for Sugar Protocol Countries

**CC** Climate Change

**CEA** Country Environmental Analysis

**CSP** Country Strategy Paper

**EC** European Commission

**EDF** European Development Fund

**EIA** Environmental Impact Assessment

**EPA** Environmental Protection Agency

**EU** European Union

**JCS** Jamaica Country Strategy

**M&E** Monitoring and Evaluation

**MIP** Multi-annual Indicative Programme

**NAS** National Sugar Adaptation Strategy (Trinidad & Tobago)

**NIP** National Implementation Plan

**POP**  Persistent Organic Pollutant

**PPP** Policy, Plan or Programme

**PRSP**  Poverty Reduction Strategy Paper

**PSIA** Poverty and Social Impact Analysis

**SEA** Strategic Environmental Assessment

**SPSP** (EC) Sector Policy Support Programme

**TIPG**  Transport Integration Plan for Ghana

**ToRs**  Terms of Reference

**ZNSS**  Zambian National Sugar Strategy

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| Executive Summary **Review of Strategic Environmental Assessments under**  **EC Development Cooperation – Main Messages**   * Strategic Environmental Assessment (SEA) is a range of analytical and participatory processes for evaluating the environmental consequences (both positive and negative) of proposed Policy, Plan or Programme (PPPs) initiatives in order to ensure that they are appropriately addressed at the earliest stage of decision-making alongside social and economic considerations. * SEA provides a practical and direct means of progressing MDG 7 on Environmental Sustainability. The Paris Declaration on Aid Effectiveness, adopted in 2005, commits donors to reform the way in which aid is delivered to improve effectiveness and calls upon donors and partners to work together to “develop and apply common approaches for SEA at the sector and national levels”. * For some four years, in parallel with other bilateral and multilateral institutions and efforts to harmonise SEA approaches within the OECD-DAC, the European Commission (EC) has promoted the application of SEA as a tool in development cooperation. EuropeAid now considers it an opportune time to take stock of EC experiences in applying SEA. * This review aims to support EuropeAid to learn from its past experiences in using SEA and to propose practical recommendations that will help to maximise the influence and impact of SEAs in future EC development cooperation. * The review covers eight SEAs: five related to sugar sector reforms (Jamaica, Mauritius, Tanzania, Trinidad & Tobago and Zambia) and three related to infrastructure proposals ie transport and sea defences (Ghana, Mali and Guyana). * In a relatively short time frame since being introduced as a development tool by the EC, SEAs have had a range of positive impacts upon PPPs. Some have had more influence and impact than others reflecting a range of strengths and weaknesses which are explored in this review. * All of the SEAs succeeded in raising awareness and debate about environment and climate change (CC) issues generally, the role of SEA as a planning tool and in stimulating debate about environment in the proposals. Some SEAs showed innovation in promoting environmental awareness and inclusive debate including establishment of a “world cafe” and issuing a press release in Zambia, and a web blog in Trinidad and Tobago. * Aside from increased environmental awareness, examples of positive SEA influence include: * Integration of key environment issues in EC programming documents and financing agreements between Government and the EC eg targets for green cane harvesting in the sugar sector in Jamaica and Mauritius and on sugar factory practices in Tanzania. * Incorporation of environment dimensions in Multi-annual Indicative Programme (MIPs) relating to the Accompanying Measures for Sugar Protocol Countries (AMSP) funded under the EU budget. This included a funding line for water efficient drip irrigation, waste water management and energy efficiency in Jamaica, and funding for activities recommended by the SEA in Zambia, such as sound management of vinasse (waste from the sugar industry) and revision of EIA procedures to deal with ethanol production. * Financing for a mangrove restoration project as part of EC support for the Guyanese Sea Defence Policy. * Providing evidence and analysis for the European Union (EU) Trinidad & Tobago Delegation to establish a dialogue with Government regarding environmental and socio-economic considerations for integration in implementation of the National Sugar Adaptation Strategy. * Integration of environment issues into Government policies and plans including the Jamaica Country Strategy for the Adaptation of the Sugar Industry and the Zambia National Sugar Strategy 2010-2015. * SEAs did not always necessarily introduce new environmental issues to the table but they did help to formalise debate about them in a manner which promoted their consideration and inclusion in policy making and programme design. * All of the SEAs reviewed made positive contributions to their respective PPPs (both Government and the EC plans and strategies). These range from identification of environmental safeguards (ensuring that the PPPs do not cause environmental harm), to integrating environment in Government PPPs and EC strategy documents (eg finance agreements and MIPs). The benefits of SEA in EC programmes to date justify further use and development of this tool in development cooperation. * However some challenges need to be addressed in order to maximise the benefits of SEA in EC programmes. These include placing greater emphasis on the identification of opportunities and value-added in SEAs, increasing government ownership, better integration of SEA within the PPP design process, focusing more on institutional issues and on climate change and requiring more focus on the practical implementation of SEA recommendations. * The report makes recommendations which are structured around six key priority issues complemented by six supporting measures. The recommendations are mutually reinforcing and should be considered collectively rather than separately in order to have greatest impact.  |  |  | | --- | --- | | **Key Priority Issues:** | **Key Supporting Measures:** | | - Focus on Opportunities & Value Added  - Increased Government Ownership | - Improved ToRs  - Guidance on SEA | | - Integration of SEA and PPP Design | - Improved Quality Assurance | | - Focus on Institutional Issues | - Improved Presentation & Communication | | - Focus on SEA implementation  - Attention to Climate Change | - Attention to Alternatives, Cumulative and Indirect Impacts | |  | - Focus on M&E |  * **Greater emphasis on SEA opportunities and value-added:** Value added requires identifying measures beyond environmental safeguards in order to enhance the overall goals and objectives of the PPP itself and, where possible, support wider goals such as poverty reduction. Some SEAs, especially those for the sugar sector reforms in Jamaica and Mauritius, proposed “value adding” recommendations such as introduction of clean technologies to promote energy and water efficiency and reduce pollution which increase productivity and competitiveness whilst tackling environmental concerns.   Linking environment to the socio-economic priorities of government is a potential entry point for SEAs to demonstrate “value added” and garner government support. Most of the SEAs reviewed focussed strongly on the bio-physical issues and impacts and proposed environmental safeguards. Few embraced deeper consideration of socio-economic linkages and the role of environment in contributing towards goals of poverty reduction and economic growth. The Ghana SEA was one of the few that did highlight poverty and livelihoods issues although it does not appear to have influenced overall policy design. More emphasis on identifying opportunities for value added and consideration of “green economy” opportunities in SEAs would assist in creating ownership and “buy in” to SEAs.   * **Increasing government ownership:** One of the biggest challenges to SEA influence is a lack of Government ownership – an issue affecting all donor SEAs. There are many reasons including low levels of SEA awareness; limited capacity and resources (not only at Government but also at EU Delegation level); perceptions that SEAs are “imposed” by the EC and lead to delay or additional costs to the proposal without adding value; and limited or no Government involvement in determining the need for an SEA and its design. Early EC engagement with Government regarding SEAs is key to addressing this issue as are measures to increase Government and EU Delegations awareness and capacity on SEA . * **Integrating SEA and PPP design:** For many of the SEAs, such as that for the Ghana Transport Policy and those for sugar in Zambia, Mauritius and Tanzania, the SEA was conducted as a very separate exercise with limited interface and inter-linkage between the SEA and programme design team. Moreover, several SEAs began once the PPP was already under design and even nearing completion. This timing issue emerged as a concern to both EU Delegations and Governments. Many felt that delays in initiating SEAs such as in Ghana meant that outputs were not timely and thus unable to influence programme design. Better integration between the PPP design and SEA would help to address this common short-coming. * **More focus on institutional issues:** A weakness in almost all the SEAs relates to institutional analysis. Typically the SEAs described, rather than analysed, institutional, legal and policy frameworks and, in assessing the technical dimensions of environmental management, ignored the institutional dimensions which determine whether environment issues are effectively dealt with or not. An increased emphasis on institutional analysis is required. This may sometimes require only simple techniques such as the review of existing documents eg World Bank Country Environment Analyses or EC Country Strategy Papers (CSPs) to identify institutional strengths and weaknesses or meetings with Government to identify windows of opportunity - such as the review of a PRSP- to influence decision-making. In conducting an SEA, teams need to wear an “institutional hat” at all times and take into account issues of capacity, the willingness and ability of institutions to implement environmental management measures, to identify the incentives and disincentives for stakeholders to implement recommendations and to provide tactical insights and identify entry points which offer opportunities to promote integration of environment in PPPs. * **More emphasis on SEA implementation:** The quality of the SEAs overall was reasonable with many sensible recommendations proposed. However the influence of recommendations was reduced because they were not prioritised and details of their implementation eg estimation of costs, institutional responsibility, timing etc were omitted. A post-SEA Action Plan would help to address this (see Annex 5 for an example of an idealised action plan). Changes such as improvements in SEA presentation and greater consideration of post-SEA implementation would also significantly improve the overall quality and influence of EC SEAs. * **Greater attention to climate change:** Climate change was not covered in some of the SEAs (and in fairness the ToRs did not require this). However, for many of the PPPs climate change was a relevant issue and deserved greater attention than it was given. Given the current high profile of debate about CC, future SEAs should capitalise upon this as a topical issue to improve support for the SEA as well, of course, as ensuring that EC programmes adequately address adaptation, mitigation, low carbon development and access to climate finance. * **The recommendations** set out in Section 8 of this report aim to identify opportunities to build upon the solid foundation of SEAs in EC development work to date. This recognises the positive impacts already achieved by the SEAs themselves and the quality of SEA Guidance provided by EuropeAid. If these recommendations are embraced we believe that SEA has a strong and very promising role to play in promoting integration of environment and climate issues in EC development cooperation. * In proposing these recommendations, the authors recognise that resources are scarce and do not argue that significant additional resources should be provided for individual SEAs. Recommendations could partially be fulfilled through re-prioritisation of tasks within the SEA process itself including refinement of the generic SEA ToRs to ensure that only the most relevant tasks are undertaken. For instance the resources used in compiling long series of data – including lists of species and rainfall patterns which have limited bearing on the PPP – could be used for other tasks such as institutional analysis or identifying entry points for SEA to influence decision-making. Some recommendations such as those for providing support for quality assurance of SEA process and outputs, and for building capacity in Government do present additional resource requirements but amount to approximately 3-10 additional days of input. * The following “tag cloud” graphically identifies the key issues which have emerged from this review and suggests tools and approaches which may help to strengthen SEAs as a development tool in the future. * A detailed table of key issues, their description and proposed recommendations is found in Section 8 of this report. |
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**Tag Cloud : Key Issues Affecting the Influence & Outcome of EC SEAs**

**increased government**

**ownership**

**integrated SEA & PPP design**

**focus on institutional issues**

improved ToRs

improved presentation & communication

improved quality assurance

**attention to climate change**

**focus on SEA implementation**

EC guidance on SEA

**emphasis on opportunities &**

**value-added**

attention to alternatives & cumulative & indirect impacts

focus on M&E

**Key**: Size of font indicates scale of importance of issue. Large, bold font indicates key issues whose implementation could affect the overall outcome of improving environmental integration in the PPP. Small font indicates key supporting issues - often a tool or approach whose implementation would support attainment of the outcome.

# Introduction

* + - * 1. The European Commission (EC) has committed to promote the application of Strategic Environmental Assessment (SEA) as a key tool to address environmental sustainability concerns in relation to planned support for Policies, Programmes and large Plans (PPPs), and to link these concerns with economic and social considerations. Strategic Environmental Assessment is a range of analytical and participatory processes for evaluating the environmental consequences (both positive and negative) of proposed Policy, Plan or Programme (PPPs) initiatives in order to ensure that they are appropriately addressed at the earliest stage of decision-making alongside social and economic considerations.
        2. SEA provides a practical and direct means of progressing MDG 7 on Environmental Sustainability. The Paris Declaration on Aid Effectiveness, adopted in 2005, commits donors to reform the way in which aid is delivered to improve effectiveness and calls upon donors and partners to work together to “develop and apply common approaches for SEA at the sector and national levels”.
        3. Use of SEA by the EC in development assistance is set out in several official texts and regulations. For example the European Consensus on Development establishes a commitment to prepare SEAs for budget and sectoral aid. Use of SEA is also foreseen under Regulation (EC) No 1905/2006 of the European Parliament and of the Council of 18 December 2006 establishing a financing instrument for development cooperation in connection with the implementation of sector programmes (art. 22.4), and by the Common Framework for Drafting Country Strategy Papers (CSPs) and Joint Multiannual Programming (COM(2006) 88 final, Annex).

* + - * 1. Key guidance to help to meet these obligations is provided in EuropeAid’s Guidelines on the Integration of Environment and Climate Change in Development Cooperation in force since November 2009 (EuropeAid, 2009). These Guidelines set out the framework to support the integration of environment and climate change (CC) into the different stages of the cycle of operations for EC development cooperation. They include guidance on SEA screening, scoping, studies and public participation as well as identifying key entry points for SEAs and providing generic Terms of Reference (ToRs).

* + - * 1. These commitments and guidelines ensure that the EC is in line with the commitment made in 2005 by donors and partner countries under the Paris Declaration on Aid Effectiveness to develop and apply common approaches for SEA at the sector and national levels.
        2. Ownership is the first of five principles of the Paris Declaration: “Developing countries set their own strategies for poverty reduction, improve their institutions and tackle corruption.” In the Declaration, developing countries committed to strengthen their systems, including environmental assessment (Accra Agenda for Action, 2008).
        3. While Environmental Impact Assessment (EIA) is directed at projects, SEA applied at a higher decision-making level. The shift of emphasis away from development projects to programme and policy support has created a number of particular entry points for the application of SEA (OECD, 2006).

* + - * 1. The EC has commissioned some 10-15 SEAs over the past few years in relation to planned sector wide support in environmentally sensitive areas such as transport, regional development planning, sea defences and sugar adaptation strategies.
        2. Under the 10th European Development Fund (EDF 2008-13) some 25 CSPs commit EC Delegations and their country partners to employ SEA as a development tool. An increase in the number of SEAs commissioned by the EC can thus be anticipated in the coming years.
        3. EuropeAid now considers it an appropriate time to take stock of its work on SEA and has commissioned this internal review to support its endeavours to learn from past experience and draw this into practical lessons for future use of SEA.
        4. **Structure of the Report**

Sections 2 to 4 set out the background to this report including its core purpose, the methodology employed and some contextual information based on other donor approaches and key emerging issues. Section 5 provides a short summary of the key findings for each SEA reviewed and Section 6 highlights the key findings based upon the core evaluation criteria. Section 7 provides a discussion of these findings and sets the framework for the recommendations provided in Section 8. An overall conclusion is provided in section 9.

# Purpose and Approach

* + - * 1. **The purpose of this assignment is to support EuropeAid to learn from its past experiences in using SEA in development programmes by reviewing and assessing a number of completed SEAs, identifying their strengths and weaknesses, the key lessons emerging and, drawing upon these lessons, propose practical recommendations that will assist the EC in determining how to effectively use SEA in future development cooperation.**
        2. The review focuses upon three key focal areas of SEA process, outputs and outcomes:

i) SEA Compliance, Relevance and Consistency

ii) SEA Quality

iii) Influence & Outcome

* + - * 1. **SEA Compliance, Relevance and Consistency**

This aspect of the review explores if use of SEA was justified (relevant) given the nature of the proposal (policy, plan, programme). It also explores the degree to which the SEA reports adhere to their ToRs (ie are the main requirements of the ToRs satisfied? Which ones are not?), and tries to understand, when appropriate, the main differences between the SEA reports’ contents and the related ToRs.

* + - * 1. **Quality of the SEA**

This aspect explores:

*i) The Quality of the SEA Report*: including its presentation and ease of use, the comprehensiveness of coverage and the degree to which it assists decision-makers in making informed decisions.

*ii) The SEA Process:* ensuring that key steps such as scoping, baseline analysis, identification of alternatives, institutional analysis, mitigation and enhancement measures, and Monitoring & Evaluation have been addressed. It also considers to what extent climate change has been assessed.

*iii) Consultation and Participation:* including the level of engagement in the SEA by stakeholders from government to civil society and end users e.g. subsistence farmers and the degree to which their inputs are reflected in the SEA.

* + - * 1. **Influence and Outcome**

Fundamentally, the EC undertakes SEAs to promote environmental sustainability in its development cooperation work and to improve the overall quality of its programmes. The review determines to what extent SEAs have “added value” to PPPs. In essence a key question is “what would have happened if the SEA had not taken place?” This critical part of the review aims to determine what impact the SEA has had both on the EC support programme and on the country’s policy or programme assessed (e.g. did the SEA lead to any changes to the design of the EC support programme or to the policy or programme of the partner Government?). It also explores levels of influence upon institutions involved with the SEA (e.g. did it increase awareness and understanding of SEA within the Government and within the EC?). An important suite of issues assessed include the organisational and operational dimensions including the capacity (human, financial and technical) of institutions to manage SEAs and the commitment of institutions to support and implement SEA recommendations – to what extent have recommendations in the SEA been, or are likely to be, implemented?

* + - * 1. The approach adopted in this review focuses on practical lesson learning - viewing SEA as a tool (and not an end point) to promote environmental integration within EC development cooperation and to “add value” to such assistance. The focus and approach of the review is a practical, non-academic one with the emphasis upon identifying key lessons and pragmatically drawing out implementable recommendations to strengthen use of SEA by the EC in the future.

* + - * 1. Throughout the review the consultants have been mindful of the broad range of factors which determine the use of, and eventual impact, of SEA in development cooperation including political and institutional factors, capacity and resource issues as well as technical dimensions.

# Methodology

* + - * 1. Eight SEAs were selected by the EC for review in this assignment. They represent a range of interventions and include the programme in which SEA has been most widely applied by the EC – that for sugar reform. The SEAs reviewed include five for sugar reform and three covering infrastructure policies or programmes (transport and sea defences):
* Jamaica: SEA of the implementation of the Multi-Annual Adaptation Strategy 2006-2015 – Final Report March 2009;
* Mauritius: Implementation of the Multi-Annual Adaptation Strategy for the Mauritian Sugar Cane Cluster (2006-15) – Final Report June 2007;
* Tanzania: SEA of the Sugar Reform Accompanying Measures (2007-10) – Final Draft June 2007[[1]](#footnote-1);
* Trinidad & Tobago: SEA of the implementation of the National Sugar Adaptation Strategy – Draft Report 2009 (considered as Final Report by the European Union (EU) Delegation in Trinidad and Tobago);
* Zambia: SEA of the sugar sector (Zambian National Sugar Strategy) – Final Report January 2010;
* Ghana: SEA of the Transport Integration Plan – Final Report June 2010;
* Mali: SEA of the Support Project for the Transport Sector Programme – Final Report September 2008;
* Guyana: SEA of the Sea Defences Sector Policy– Final Report 2009.
  + - * 1. The review was undertaken over a period of four months with 40 person days and was based on three main metho-dological tasks:

i)  SEA desktop review and analysis;

ii)  Dissemination and analysis of questionnaires to EU Delegation officials; and

iii)  Telephone interviews with key stakeholders.

* + - * 1. **SEA Desktop Review and Analysis**

Annex 1 contains an evaluation grid which was the principal tool for this review. This grid aims to provide a practical framework for desktop review of the eight SEAs based upon questions around three core issues : i) SEA Compliance, Relevance & Consistency; ii) SEA Quality; and iii) Influence & Outcome of the SEA.

* + - * 1. The evaluation grid is inspired by the draft OECD DAC Generic SEA Review Methodology (Sadler and Dalal-Clayton, 2009) but, at the request of the EC, has been adapted to make it shorter and simpler to use. It is designed to support the reviewers to focus upon practical considerations and lesson learning thus ensuring that pragmatic recommendations can be made to EuropeAid.
        2. The evaluation grid questions are also influenced by the EC’s internal guidance on SEAs. This is contained in Guidelines on the Integration of Environment and Climate Change in Development Cooperation (EuropeAid, 2009). This sets out clear procedures and guidance for when SEAs should be employed e.g. for Sector Policies and Support Programmes in environmentally sensitive areas and how to do so including generic ToRs.
        3. When all of the SEAs reviewed were commissioned, the EC’s 2007 Environmental Integration Handbook for EC Development Co-operation (EuropeAid, 2007) was in force and it is against this guidance (rather than that from 2009) that we have assessed the SEAs.
        4. **Questionnaires**

Annex 2 contains the questionnaire that was sent to the EU Delegations responsible for the eight SEAs being reviewed. The questionnaire supplements the results of the desktop review by providing input and insights from EC officials “in the field” who were involved directly or indirectly in various stages of the SEA process including its implementation. Seven of the eight questionnaires were returned.

* + - * 1. **Telephone interviews**

The desktop review of SEAs and questionnaire approach both had limitations in terms of accessing the “full story” – some information was simply not available in the SEA itself and the written reports did not provide insight into the “political economy” of SEA in terms of constraints, government “buy-in” and the incentives/disincentives of stakeholders to engage with and implement the SEA.

* + - * 1. For this reason a number of telephone interviews (approximately 25) were held with various stakeholders involved in the SEAs in question ie EC officials in Brussels and Delegations, key partners in Government and other stakeholders such as donors. Annex 3 provides details of those interviewed.
        2. Interviews enabled the review team to consolidate the findings from the desk top review of SEAs and questionnaires to better understand the practical realities of implementing SEA in EC development cooperation and to understand the level of influence and impact that the SEAs achieved.
        3. Interviews included discussion around :
* What tangible outcomes has the SEA achieved?
* What would have happened if the SEA had not taken place (the counter-factual)?
* What was the level of Government (and other key stakeholder) ownership of the SEA?
* At what stage of the policy or programme’s development process was the SEA undertaken? (eg formulation, implementation stage)? Did timing impact upon its influence?
* What consideration was given to implementation of the SEA in terms of resources (eg human, financial)?
* If the SEA was to be repeated again today what would be done the same or differently to maximise its impact and influence?
  + - * 1. **Limitations of the Review**

There was limited time and resources available to undertake this review. This means that it focussed upon review of the final SEA report only. Scoping reports, other SEA documentation and the PPP documents were not provided nor reviewed. Some related documents e.g. draft Multi-annual Indicative Programmes (MIPs) were reviewed when they were provided.

* + - * 1. As previously mentioned, telephone interviews were undertaken with EC officials, with partners in Government and other stakeholders. Changes in staff, new postings and retirement meant that, in both EU Delegations and Government, there were sometimes gaps in institutional memory regarding the SEA process and its details. The interviews however provided great insight and better understanding of the SEAs and all those approached were generous with their time and assisted the review team considerably to access the information required.

# Context - Lessons from Other Donors and Emerging Issues

* + - * 1. **Lessons From Other Donors**

SEA has been applied by donors for a number of years and recently there have been evaluations of this experience which are relevant to this review.

* + - * 1. Key themes that emerge from recent reviews and guidance include:
* The need for SEA to be grounded within the local political and institutional context rather than separate from it;
* Recognition that SEA only tends to have positive outcomes if there is sufficient ownership by governments, civil society organisations and communities;
* The need to build constituencies that can sustain policy influence and institutional changes over the longer term (rather than simply over the life of the SEA);
* The importance of appropriate capacity building initiatives in planning and implementing agencies including identification of SEA champions with the ability to influence and empower;
* The need to integrate SEA within the broader framework of policy and plan formulation rather than design it as a separate activity;
* Incorporation of economic and financial analysis in the SEA process to link SEA to key financial planning processes and ensure sufficient resources for implementing SEA recommendations; and
* The importance of articulating SEA outputs in language which is meaningful to decision-makers.
  + - * 1. Sources for the findings above are The World Bank et al., 2010; The World Bank, 2010; Dusik and Xie, 2009; Ghanime and Risse, 2007.
        2. **SEA and Climate Change**

Climate Change is a constituent part of SEA and although SEA practitioners are still grappling with how to best integrate climate issues in SEAs it is worthy of particular attention because of the current political interest in it as an issue. In particular SEAs need to better integrate and manage climate change issues in order to generate political interest in SEA overall.

* + - * 1. Political focus and attention to climate change as a development issue has emerged relatively recently. As a result experience and empirical evidence on the inclusion of climate change mitigation and adaptation considerations in PPPs through SEA is not yet well developed. SEA, as a tool, is well placed to help integrate climate change issues in PPPs and deliver better informed, evidence-based PPPs that are more sustainable in the context of a changing climate, and more capable of delivering progress on human development.
        2. The OECD DAC ENVIRONET has endorsed an [*Advisory Note on* *SEA and Adaptation to Climate Change*](http://www.oecd.org/dataoecd/0/43/42025733.pdf) (OECD, 2008) which provides guidance on how to use SEA to mainstream climate change adaptation into strategic planning, and could be used in addition to the EuropeAid Guidelines on the Integration of Environment and Climate Change in Development Cooperation (2009) to support future work of EU Delegations in tackling climate change in SEAs.
        3. **SEA and the Green Economy**

Recent reviews on SEA (including this one) highlight the need for SEAs to “add value” to PPPs and identify opportunities to enhance and strengthen proposals. Green economy entry points in SEAs could be one such way to add value.

* + - * 1. A key opportunity for SEAs to demonstrate their value is to identify those “win-wins” in which environmental protection or clean-up operates synergistically alongside activities which enhance the efficiency and productive capacity of key economic activities such as agriculture, industry, tourism, mining, etc. Opportunities for economic growth and job creation exist in the application of clean technologies promoting energy, water and natural resource efficiencies. This is potentially more likely to encourage decision-makers to adopt SEA recommendations where environmental benefits work alongside social and/or economic gains.
        2. In some instances measures to promote the green economy will benefit from regulatory and policy frameworks with possible accompanying financial support to bring about reform at scale. However at smaller programme and project scale some measures, particularly those focussed upon environmental technologies and sustainable resource management, may deliver both economic and environmental benefits without the need for accompanying policy and regulatory reform. SEAs are well placed, when assessing PPPs, to identify entry points to promote clean and green technologies which support both socio-economic development and sound environmental management. This should be an area for further focus and development in EC SEAs, and is considered further in the Discussion in Section 7 (Under “Increased Focus on Opportunities and Value Added”).

# Summary of Seas Reviewed

Table 1 provides a quick summary for each of the SEAs reviewed. A fuller and more detailed analysis based on the review evaluation grid is included in Part B of this report. Section 6 then gives an overview of the main findings of the whole review. It is followed by a discussion in Section 7 in which the framework and justification for recommendations to improve use of SEA in EC development cooperation (Section 8) is provided.

**Table 1: Summary of key findings for each SEA reviewed**

*See annexes in Part B of the report for full details of these SEAs.*

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| --- |
| **1. Jamaica: SEA of the Implementation of the Multi-Annual Adaptation Strategy 2006-2015** |
| **Background**   * The Jamaica Country Strategy (JCS) for the Adaptation of the Sugar Industry contained some attention to environment. The SEA was commissioned to provide more detail and ensure that EC support via the MIP adequately addressed key environment concerns. * Commissioned by the EU Delegation in partnership with Sugar Transformation Unit of the Ministry of Agriculture. * Conducted January to March 2009 by Agreco Consortium. Team of two with 67 man days. |
| **Key SEA Review Findings**  ***Strengths***   * SEA provided a focussed set of recommendations, following scoping, based primarily around energy, water resources, land degradation and factory management. * SEA identified concerns with proposed JCS indicators, which would exacerbate existing environmental problems, and proposed alternatives. * Interviewees indicate the SEA team was dynamic and engendered wide support and interest in the SEA.   ***Weaknesses***   * Stakeholders felt that some recommendations, whilst inherently sensible, were too generic to enable ready implementation. * Recommendations would have benefitted from being presented in some form of action plan/stand alone document identifying next steps to assist in follow up and implementation. * Sensible ideas on access to carbon credits (which generated Govt interest) could have been much stronger with some quantification and identification of next steps. |
| **Influence & Outcome**   * Increased awareness and discussion regarding environment in the sugar industry following the SEA. * SEA recommendations on green cane harvesting, drip irrigation & application of environmental regulations in sugar, run & ethanol factories integrated in the revised JCS (2009). * The draft MIP (2011-13) provides support through concessionary loans to implement the above recommendations. |
| **Examples of Good Practice**   * Report length of 58 pages more accessible than many of the other SEAs. * Links made to other PPPs – in this case national energy policy and scope for sugar industry to implement co-generation in support of national energy targets. Identification of follow up steps would however have been helpful. |
| **2. Mauritius: Implementation of the Multi-Annual Adaptation Strategy for the Mauritian Sugar Cane Cluster (2006-15)** |
| **Background**   * The Mauritius Multi-Annual Adaptation Strategy aims to support improved competitiveness in the Mauritius sugar industry from field to factory including mechanisation of operations, centralisation of milling from 11 to 4 factories, installation of new power plants and rehabilitation of sugar cane land to other uses. * Conducted January to June 2007 by a team of 4 (experts in SEA, EIA, Mauritius sugar industry & tropical agriculture) with a total 191 man days. * Environment issues e.g. waste management & air quality in the sugar industry have been debated for some time including links to World Bank loans in the 1980s/90s and more recent Global Environment Facility funding. The SEA stimulated increased interest in addressing key environment concerns in the sugar industry. |
| **Key Review Findings**  ***Strengths***   * Good scoping with narrowing down of key environmental issues and sensible safeguards identified. * Strong technical analysis for key environmental issues. * Consultation process involving over 80 participants generated strong interest in the SEA at a technical level.   ***Weaknesses***   * Limited buy-in to the SEA by senior officials across Government reflecting a need for stronger leadership and ownership of environment, and for improved & formalised consultation structures. * Limited institutional analysis and proposal of some recommendations eg on environmental regulation which ignore institutional capacity constraints. * Team discussed energy issues but would have benefitted from greater technical expertise in the energy sector as this is a priority for Government and a key issue for the sugar industry. |
| **Influence & Outcome**   * SEA stimulated debate about environment in the sugar industry – debate which had been muted before. * Targets to reduce sugar cane burning (by 1.5% land area per annum) introduced in Finance Agreements signed between Government and the EU Delegation. |
| **Examples of Good Practice**   * SEA linked discussion of energy needs at sugar processing plants with EC energy sector support and identified synergies. |
| **3. Tanzania: SEA of the Sugar Reform Accompanying Measures (2007-10) – Final Draft** |
| **Background**   * Sugar Reform Accompanying Measures aims to support increased productivity and efficiency at key sugar operations in Tanzania with a budget of a €6 million. * Personnel changes in both Delegation and Government mean background to the study is limited. * SEA (final draft) produced in June 2007. A final report was not available, nor other documents such as scoping study or ToRs. |
| **Key Review Findings**  ***Strengths***   * Short and accessible report with recommendations easily identifiable.   ***Weaknesses***   * Analysis is often cursory and does not appear complete and whilst recommendations appear sensible at a generic level there is little detail nor justification. * The Tanzania Sugar Board claimed not to have received the final report and overall ownership by Government of the SEA appears very weak. |
| **Influence & Outcome**   * Some of the SEA recommendations, eg on implementation of recommendations for factory practices to reduce pollution, were integrated within the 2007 Finance Agreement between the Government and the Delegation. * Some measures to tackle key environment issues (with EC support) have been undertaken e.g. water resource & efficiency studies and the Tanzania Sugar Board recognises the need to better manage scarce natural resources. The linkage however between such activities and the SEA is hard to determine. |
| **Examples of Good Practice**   * N/A |
| **4. Trinidad & Tobago: SEA of the implementation of the National Sugar Adaptation  Strategy (NAS)** |
| **Background**   * The NAS is part of Vision 2020, the country’s National Development Plan. It identifies alternatives to sugar cane production (agriculture, residential development and industrial estates). * SEA carried out to examine the net socio-economic and environmental effects of these alternatives. Led by the Trinidad & Tobago Ministry of Agriculture, Land and Marine Resources. * Conducted between January and May 2009 by NIRAS. Team of 2 (1 environmental and 1 agricultural economist/sugar sector expert) with 138 man-days. |
| **Key Review Findings**  ***Strengths***   * Environmental, social and economic considerations of the NAS well assessed and balanced, and recommendations often enhanced the socio-economic dimensions of the Strategy. * Provided a good description of the environmental impacts and opportunities of the Strategy. * Addressed well the potential synergies and conflicts between the NAS and other relevant PPPs. * Climate changeimpacts (on the NAS and of the NAS) generally well addressed, and appr*o*priate recommendations formulated regarding low carbon development and mitigation. * Incorporated v*i*ewsofstakeholders from various communities and sector.   ***Weaknesses***   * SEAreport’s Executi*v*e Summary could be more detailed(especially regarding SEA recommendations and key environmental and socio-economic impacts of the NAS). * Implementation details of indicators proposed in the SEA (who, how, when) would be useful to increase implementation potential of the recommendations. |
| **Influence & Outcome**   * SEA provided the EU Delegation with a more credible dialogue with the Government. * Helped refine the NAS, and make the NAS more tangible by identifying concrete issues and measures to consider when implementing it. * Increased awareness of stakeholders consulted about social, environmental and economic implications of the NAS. * Government indicated its interest to implement SEA recommendations according to the various implementation phases that characterize the NAS. |
| **Examples of Good Practice**   * Recommendations are justified (ie “benefits” and “costs” of not taking these recommendations into account are outlined) (see pp. 80 and followings of SEA report). * Use of innovative consultation approaches (eg blog specific to the SEA of the NAS: <http://seaforttnas.blogspot.com/>) (see pp. 24-25 and 104-106 of SEA report). * Good working cooperation and information sharing between the SEA consultants and the stakeholders in charge of the NAS (see part B, Annex 4, section 3.6 of this review report) * Early engagement by EU Delegation with Government and other stakeholders contributed to good Government ownership of SEA (see part B, Annex 4, section 3.7 of this review report). |
| **5. Zambia: SEA of the sugar sector (Zambian National Sugar Strategy - ZNSS)** |
| **Background**   * ZNSS aims to develop to expand sugar production; support diversification (eg ethanol production for fuel blending, co-generation of electricity); and improve transport network and services. * SEA carried out to enhance environmental performance of the Strategy. Led by the Ministry of Commerce, Trade and Industry * Conducted between September 2009 and January 2010 by Agreco Consortium. Team of 3 (1 expert in environmental and policy management, 1 agronomist and 1 socio-economist) with 148 man-days. |
| **Key Review Findings**  ***Strengths***   * Impacts of the ZNSS on social issues (eg gender, HIV/Aids) were thoroughly assessed. SEA also often outlined the socio-economic dimensions of the environmental measures it recommends and made recommendations that enhance the socio-economic dimensions of the strategy. * Provided a good description of the environmental impacts and opportunities of the ZNSS and of its alternative, including positive impacts and economic opportunities. * Addressed very well synergies and conflicts between the ZNSS and other policies, plans, programmes and made relevant recommendations. * Gave meaningful opportunities for stakeholders engagement in the process. * Provided good summary of key issues and recommendations including some prioritisation but would benefit from more specificity on next steps for implementation.   ***Weaknesses***   * SEA presentation could be improved (eg. by using bigger font, avoiding repetition). * Specific institutions/organizations in charge of implementing recommendations would deserve to be more systematically identified to increase implementation potential. * Reference to climate change (especially how to adapt to the impact of reduced water availability and increased temperatures upon sugar productivity) could be better developed. * Capacity would need to be increased to ensure implementation of SEA recommendations. * Government ownership could be enhanced. |
| **Influence & Outcome**   * SEA guided the Government on which measures of the ZNSS to focus during the implementation phase and on how to implement those. * SEA recommendations influenced revision of the ZNSS 2010-2015 and have been reflected in the MIP 2011-2013 which will include funding for their implementation. * Raised environmental awareness within Government and stakeholders consulted. |
| **Examples of Good Practice**   * Early involvement of stakeholders, including the Government, in the SEA process (see part B, Annex 5, section 2.3.1 of this review report) contributed to reinforce understanding of the process. * Use of innovative approaches (eg World Café format, joint press release from the EU Delegation and the Zambian Government) to reach a wide range of stakeholders, including less powerful stakeholders (eg women) and raise awareness (see Appendix 5 of SEA report and part B, Annex 5, section 2.3.1 of this review report). |
| **6. Ghana: SEA of the Transport Integration Plan (TIPG)** |
| **Background**   * The TIPG is intended to operationalise the 2008 National Transport plan. The EU Delegation is providing financial support to the TIPG and given its potentially significant environmental impacts an SEA was commissioned. * TIPG design commenced in 2008. The SEA was commissioned from Mott MacDonald in January 2009, with scoping May –July 2009 and final report submitted June 2010. Team of 8 technical experts with a total of 38.5 “months” inputs. * A re-organisation of Government Ministries in Jan 2009 had a significant effect on the TIPG design with creation of a Ministry for Transport and a Ministry for Roads & Highways. TIPG developed a strong focus on roads especially highways projects. |
| **Key Review Findings**  ***Strengths***   * Strong and committed SEA team which worked hard to influence the TIPG despite considerable challenges and delay in starting the SEA, limited linkages to the TIPG design team & process and challenges of limited Government support. Analysis of issues and impacts covered the breadth of environmental, social, cultural and economic issues from water quality to public health, jobs etc.   ***Weaknesses***   * Limited Government support for the SEA, particularly at high level. * Timing of the SEA meant that much of the design work for TIPG had occurred before the SEA began. * ToRs for the TIPG design team did not require liaison and close working with the SEA team. * Some recommendations criticised as too generic and needing to be presented as more specific and targeted action points to facilitate their implementation. |
| **Influence & Outcome**   * Increased awareness about environment and climate change in the transport sector. * Weighting system for prioritisation of projects in TIPG modified to strengthen consideration of environment. * TIPG was being finalised at the time of review and full details of influence have yet to be determined. |
| **Examples of Good Practice**   * Use of risk management approaches to identify mitigation options (see Annex E of SEA report). * Greater consideration of social and economic issues, especially poverty & livelihoods, than is typical in the other SEAs reviewed. This does not appear, however, to have significantly influenced the TIPG. |

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| **7. Mali: SEA of the Support Project for the Transport Sector Programme** |
| **Background:**   * Transport sector programme 2008-2013 that aims to ensure economic and social development of the country. Supported by the EC in collaboration with other donors. * SEA carried out to identify the major environmental and social impacts of the transport programme and to recommend measures for enhancing it as well as the SPSP. SEA results shared with donors. * Conducted within a period of approximately 5 months by NIRAS. Team of 3 (1 environmental expert, 1 transport economist and 1 socio-economist) with 191 man-days and a limited budget. |
| **Key Review Findings**  ***Strengths***   * SEA report clearly written, well structured, easy to understand, very detailed and comprehensive. * Provided good justifications of recommendations. * Clearly outlined uncertainties, assumptions and value judgements related to the assessment. * Addressed well linkages between environmental, social and economic impacts, and potential synergies between the proposal and other relevant PPPs. * Included a quality assurance process (through former Environmental Integration Advisory Services). * Satisfactorily addressed climate change considerations***.***   ***Weaknesses***   * SEA conducted once decisions on the programme’s measures had already been taken, which made hard to question or improve strategic decisions. * Could better address the cumulative impacts of the projects covered by the programme. * Government ownership could be improved (SEA more perceived as an approach initiated and supported by donors than an approach owned by the Government). |
| **Influence & Outcome**   * SEA had a minimal influence on the EC support programme and transport programme because it was carried out at a late stage of the planning process. * Helped raise environmental awareness of stakeholders who participated to meeting and consultations. However, relatively low impact on high-level authorities. * Helped government officials to understand that SEA is not only a tool to assess the environmental impacts of a PPP but also a planning approach. |
| **Examples of Good Practice**   * While institutional analysis could be more developed, SEA report at least proposes general capacity building measures for its recommendations (see SEA report sections 6.1.7-6.8.7 and 7.1.4). * Strategic environmental plan (“action plan”) included in the SEA report (see report, pp. 86-87). In this plan, more specific details about who should be in charge of the recommendations would be useful to ensure responsibility for their implementation. |
| **8. Guyana: SEA of the Sea Defences Sector Policy** |
| **Background**   * Development of the Sea Defences Policy of 2008 was funded under EDF 8 to provide a framework for works to tackle under-investment in Guyana’s sea defences. Lead Government Institution: Ministry of Public Works. * SEA commenced simultaneously with the Policy design in April 2008 and final SEA report submitted January 2009. Team of 4 from IBF International Consulting carried out SEA over 200 man days. |

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| **Key Review Findings**  ***Strengths***   * Good overview of key direct and negative environmental impacts of sea defences using pressure-state-response approach. * Made linkages between the sea defences policy and other key PPPs eg the National Mangrove Management Plan   ***Weaknesses***   * Recommendations considered insufficiently detailed to encourage follow up by the Ministry of Public Works. * Limited government ownership has led to little interest in follow up. * Less attention given to climate change and the risks this presents to sea defences than would have been expected. |
| **Influence & Outcome**   * SEA generated debate about environment and climate change in the context of sea defences, providing a more formal acknowledgement of the need for these issues to be addressed. * EU Delegation is funding a €4 million mangrove restoration project commencing 2010. * In the final Sea Defence Policy little from the SEA was integrated other than recognition of a need to consider natural sea defences. |
| **Examples of Good Practice**   * Use of risk management approaches to analyse environmental impacts (SEA report section 4 & 8). |

# Main Findings

Section 6 first provides an overview of the main findings of this review against the three focal areas of SEA Relevance, Compliance and Consistency; SEA Quality; and, Influence & Outcome. The key issues emerging from these findings are then discussed in section 7.

* + - * 1. **SEA Relevance, Compliance and Consistency**
        2. Overall, application of SEA was justified and relevant in all of the case studies reviewed.
        3. For the three “infrastructure” proposals, use of SEA is clearly appropriate with each policy or programme creating a framework for significant disbursements for infrastructure construction and consequent scope for environmental impacts.
        4. For the sugar sector reforms there was also considerable scope for environmental impact - for instance from land use changes or from changes in resource consumption as well as scope for opportunities to enhance natural resources and environmental management through reform in agricultural and industrial processes. However, some stakeholders felt that the similarity in approach and (the sometimes generic) recommendations for each of the sugar SEAs might have justified a different approach. SEA is but one tool to help to integrate environment in development programmes and one possible option might have involved production of strategic guidance on environmental integration for all sugar reform programmes backed up by in-country technical assistance targeted to the specific policy and programme needs in-country to assist in implementing the guidance. This is an approach that could be considered for a such as support for the Banana Accompanying Measures.
        5. Overall, all of the SEAs broadly complied with the ToRs although many ignored some aspects. Typically institutional review, consideration of socio-economic issues, identification of alternatives, and analysis of indirect and cumulative impacts were issues most likely to be ignored. In part this reflected the generic nature of the example ToRs provided in the EC’s environmental integration guidance on SEAs (see both EuropeAid, 2007 and EuropeAid, 2009) which need to be adapted or tailored to the context of the specific PPP in question to ensure relevance.
        6. Even where SEAs adhered to the ToRs for specific issues the quality of output was not always sufficient to ensure that SEA outcomes were delivered. In some instances this can be attributed to a need for more clarity in ToRs themselves. For example, several ToRs require description rather than analysis of the institutional framework so it is perhaps not surprising that descriptions of institutions’ functions and lists of legislation and policies are provided with no analysis of their capacity to deliver.
        7. Review of the TORs for the SEAs examined suggest that these could be adapted to clarify requirements regarding a more analytical approach to the review of institutions, assessment of socio-economic dimensions of key environmental issues, specificity in recommendations and potentially the use of action plans, consideration of climate change and the need for the SEA to deliver outputs which strengthen delivery of the wider goals and objectives of the overall PPP – “value added”.
        8. One issue that arises is that generic ToRs for SEAs (drawn from the EC’s environmental integration guidance on SEAs (EuropeAid, 2007 and EuropeAid, 2009) need to be appropriately adapted to fit the context of the PPP in question.
        9. There was variability in the quality of SEAs reviewed with all showing particular strengths and weaknesses. Many Delegations and Government officers have only limited knowledge about SEA and are often overwhelmed by the sheer size and volume of SEA reports making it hard to review and quality assure them. This is particularly the case where officials have never seen an SEA before and have no bench mark to compare against. *The need for support for EU Delegations and partner governments to quality assure SEA documents stands out as a key requirement to improve both the quality and the impact of SEAs.*
        10. **SEA Quality – The SEA Report**
        11. Most of the SEAs contained impressive amounts of technical information and analysis but few stood out in terms of presenting this information in a readily accessible manner to non-specialist decision-makers. The Jamaica and Mali SEAs were amongst those with better presentation of results. That for Tanzania was thin on detail and analysis but refreshingly short at 34 pages. *Many stakeholders stated their desire to see shorter and more accessible documents with usable summaries, key messages and actions plans containing prioritised recommendations.*
        12. Overall the SEAs generally contained sensible and sound recommendations and dealt most effectively with measures to ensure environmental safeguards. Some also included measures to support the wider goals of the PPP eg environmental mitigation measures which also delivered tangible economic benefits. For instance, in the SEA of the Jamaican Multi-Annual Adaptation Strategy, a number of relevant recommendations regarding energy and water efficiency, promotion of renewable energy, waste management, etc. are proposed which will, if implemented, present clear opportunities. In Trinidad & Tobago, SEA of the Sugar National Adaptation Strategy includes recommendations that enhance the socio-economic dimensions of the Strategy eg. establishment of apiculture that will generate jobs and revenue from the sale of honey whilst also addressing demand for more pollinators and enhancing biodiversity in the area.
        13. In interviews however, a few Delegation staff expressed concerns that some recommendations, whilst inherently correct, were presented in a too generic manner to facilitate follow up action.
        14. Some, but not all, the SEAs provided justifications for the recommendations proposed. The Trinidad and Tobago and Jamaica SEAs justified most of the mitigation and enhancement measures relating to the sugar strategies making it much easier for decision-makers to make an informed decision on which actions should be pursued.

The methodological approach to carry out the assessment was usually outlined in the SEAs reviewed but reasons that justify the adoption of the approach e.g. whether to consider alternatives or not or whether to assess climate change issues were not always clearly stated. For many decision-makers the SEA final report is likely to be the only document they review in detail and so it should be a stand-alone document as much as possible ensuring that the reader is confident that the approach, eg why alternatives are or are not assessed, is cleary explained and justified. This study did not include review of Scoping Reports but it is assumed that justification for the SEA approach formed part of scoping phase and should be summarised in the final report.

* + - * 1. Many of the SEAs identify a lack of data as a constraint and cause of uncertainty but few effectively discussed or presented the assumptions and value judgements that might influence the SEA outputs.
        2. Whilst most of the SEA ToRs required consideration of linkages between environment and socio-economic considerations including any trade-offs it is clear that the majority of consultants conducting the SEAs were more comfortable in addressing the bio-physical issues. This might reflect upon the nature of SEA team composition and the need for skills in linking environment to social and economic dimensions. Some positive examples include the Ghana Transport SEA which raises poverty and livelihoods frequently and several sugar SEAs including Trinidad and Tobago which identify livelihoods diversification opportunities for former sugar sector employees. Some Delegation staff interviewed indicated that in future SEAs they might look to ensuring skills on the SEA team over and above specialisms in environment and environmental assessment.
        3. **SEA Quality – The Process**
        4. Most of the SEA reports define the objective/purpose of the SEA. However, this was not always clearly related back to relevant regulations, policies, directives and guidelines with which the SEA should conform (eg socio-economic and environmental objectives of the Government, national environmental legislation, environmental assessment guidelines).
        5. All of the SEAs included a scoping phase that identified priority issues to be addressed in the assessment. The final reports all set out why certain issues had been prioritised over others – an important element to ensure decision-makers are confident in the thoroughness and quality of the SEA outputs. Stakeholder workshops were held in several instances (e.g. in Ghana, Trinidad & Tobago and Zambia) and represent a key mechanism for defining the priority issues.
        6. Almost all of the SEAs included comprehensive chapters discussing the environmental baseline – some of it useful, but much of it descriptive and of limited relevance. Environmental baseline data such as that for water quality in Mauritius which is then used to frame recommendations is useful. However for a number of SEAs some of the environmental baseline data collected eg lists of endemic plant and animal species had little connection to the key issues identified in scoping and were not analysed in any way so that they added little value to the SEA but made it a much longer document. A more focused approach to determining environmental baselines during scoping would free up resources which could be deployed in other aspects of the SEA. This would require that baseline data is only collected where it relates to the environmental issues prioritised during scoping.
        7. Few of the SEAs were able to effectively embrace the identification and analysis of alternatives. This was due to a number of factors. In Ghana and Mali, for instance, the transport SEAs began once key decisions regarding options had largely been made. Most of the SEAs however did not describe the process for consideration of alternatives and justify why none could be put forward. In some cases, alternatives were tentatively identified (eg retreated sea walls in Guyana) but then mentioned no further or not assessed in terms of their environmental impacts.
        8. In reflecting upon the analysis of alternatives it is important to note that in a standardised SEA methodology such as that used by the EC there will be times when particular components eg exploration of alternatives, analysis of climate change etc will be more relevant than others. In the Ghana transport policy for example the analysis of alternatives appeared contrived. In this case the decision regarding key roads had been agreed long before the SEA commenced and there was no political appetite to re-examine the issue – the consultants thus worked on alternatives knowing that such an approach would never receive consideration. In such cases e.g. where the SEA is commissioned long after the PPP is designed, a degree of flexibility will be required to ensure that resources are deployed effectively and efficiently.
        9. For those SEAs that do not refer to alternatives at all it is nonetheless essential that the reasons for not doing so are set out and justified in the report.
        10. All of the SEAs were strongest when identifying and assessing the adverse negative environmental impacts (the environmental safeguards) but some also assessed, at least to a certain extent, opportunities such as scope for energy efficiency and renewable energy provision at sugar mills in Jamaica. However, few effectively addressed issues of cumulative and indirect impacts. The Mauritius SEA did consider some indirect impacts relating to impact of the sugar industry in the coastal zone and that for Mali did raise concerns about water shortages for neighbouring countries if improved access led to increased water demand in the north of the country.
        11. A key concern with most of the SEAs is that recommendations are lost in the reports and not made accessible through summary tables or action plans. Some interviewed e.g. Delegations in Ghana, Guyana and Jamaica indicated disappointment that the SEAs outputs are not as easily implementable as they should be – often because recommendations are too generic or because key aspects of implementation including next steps are not specified. In these cases some recommendations were however taken forward but this, in part, is down to the determination of Delegation staff to progress the issue of environmental integration.
        12. All of the reports provided some indicators for use in monitoring implementation of key recommendations. In some cases such as Guyana large numbers were provided and in others eg Mauritius a select few. It is likely that where indicators are adopted it will be where they are prioritised and have synergies with existing data collection mechanisms.

**Why institutional analysis is critical in SEA**

Understanding the institutional framework in which an SEA will be implemented is crucial to ensuring environment is integrated within PPPs. Most of the SEAs described rather than analysed the institutional framework e.g. they listed Government Departments, legislation, policies, plans etc but did not analyse them to determine their capacity and indeed their inclination to integrate environment in their work. Analysis requires consideration of capacity and resources but also incentives and disincentives to mainstream environment as well as identification of entry points including linkages to other policies or plans, reviews of policies in which environment could be integrated, parliamentary committees with an interest in environment and “champions” for SEA.

Ignoring institutional issues can diminish the credibility of the SEA and can reduce its scope to bring about change. For instance, a recommendation for new regulatory powers for an EPA which is not able to enforce existing laws is unlikely to deliver tangible benefits. A sugar sector SEA however which identifies Government intentions to review energy policy (or a donor interest in supporting energy policy) and identifies specific actions to promote focus on renewable energy through cogeneration at sugar mills as a core strand of the new policy may have considerable impact.

* + - * 1. Concerns regarding the timing of the SEAs were raised in many interviews- although not for every country. In Guyana it was considered that the SEA was timely whereas in Ghana and Mali it was strongly felt that the SEA was commissioned too late to have significant impact upon the plan/programme. Overall the majority of stakeholders wished for an earlier start to the SEAs to ensure that they feed in to PPP design at critical stages.
        2. All of the SEAs could have undertaken a more thorough institutional analysis. As discussed, most of the ToRs simply required a description (rather than analysis) of the institutional framework. However the importance of institutional issues as context for the SEA is fundamental. Where they were explored it was often around capacity issues. In Mali, whilst the analysis could have been more detailed the SEA did at least propose general capacity strengthening measures for each measure/project of the programme considered within the SEA. However capacity issues aside institutional analysis should also consider other factors such as drivers of change, institutional entry points, incentives and disincentives for change.
        3. Some of the SEAs reviewed outlined the synergies or conflicts between the proposal and other relevant PPPs or projects. In Mali for example, the transport sector SEA identified complementarities between projects to improve access to isolated areas in the transport programme with other relevant projects being funded by the EC which present scope for synergies. The Zambia SEA pointed out inconsistency between the National Sugar Strategy which promotes expansion of sugar cane cultivation – and increased emission of dioxins and furans due to sugar cane burning – and Zambia’s National Implementation Plan (NIP) for the Stockholm Convention which aims to reduce unintended generation of Persistent Organic Pollutants (POPs). In this case the SEA proposed amendments to the NIP. In several cases however the SEA does not provide clear recommendations to address synergies and conflicts.
        4. Climate Change was not assessed in some SEAs (eg in Tanzania) but was addressed to some extent in others (eg Guyana, Jamaica, Trinidad & Tobago, Zambia and Mali). In part this reflected the definition of the ToRs. In most cases however a more thorough review and analysis of climate issues would have added considerable leverage to the scope of the SEA to influence the PPP. In the sugar SEAs greater consideration of the impact of climate change upon sugar crops and productivity together with recommendations on adaptation would have been expected as would much stronger emphasis and detail on the scope for access to carbon finance through renewable energy production.
        5. **Consultation and Participation**
        6. All of the SEA processes involved considerable consultation with experts through meetings but the best SEAs (according to stakeholders interviewed) were those where the SEA promoted real dialogue and conversation in which environment and climate issues were actively debated in the context of the PPP and which drew in a diverse range of stakeholders whose views were taken on board.
        7. The Guyana and Tanzania consultation processes were perhaps the most “formal” (ie based around workshops and meetings) but the Jamaica, Mali, Trinidad & Tobago and Zambia SEAs engendered wide support for the SEA and generated high levels of environmental awareness (at least whilst the SEA was on-going) through more informal and innovative consultation processes such as a web blog (Trinidad & Tobago), and interactive radio broadcasts and internet consultations (Mali). In addition, a post SEA press release by the EU Delegation and Government in Zambia in the three main newspapers of the country served to generate some post-SEA report attention and debate on environment in the sugar sector.
        8. Early involvement of stakeholders, including Governments, in the SEA process helped to increase their understanding of the process. This was noted in Zambia and Trinidad & Tobago where stakeholders were invited to participate to the preparation of the SEA ToRs.
        9. **Influence and Outcome**

Seven questionnaires were returned and for the question on “whether the SEA had helped to integrate environment into the EC programme and overall add value to the policy or proposal”, six indicated that it had to “some extent” and one indicated that it had “insufficiently”. None responded “fully”. These are not surprising results (from an admittedly small sample) given that SEA is a relatively new tool in EC Development Cooperation. The review identifies that SEAs are having direct and indirect influence upon EC programmes and associated partner government strategies and plans. The questionnaire results indicate that there is nonetheless considerable scope to improve both the perceived value and overall impact and influence of SEAs.

* + - * 1. *Increased Environmental Awareness* – All of the SEAs were considered to have significantly increased awareness and discussion of environment issues with regard to the PPP in question. Without the SEA it is likely that the level of debate about environment would have been considerably reduced or non-existent. The SEA did not always introduce “new issues” but it did help to formalise consideration of environment in the context of the policy in question.
        2. *Influence upon EC programming* – Where the SEAs have had greatest influence is in integrating key recommendations in EC strategies and/or Financing Agreements particularly in the MIPs for sugar reform programmes. Draft MIPs for Jamaica and Mauritius for instance include some targets derived from the SEA on issues such as increased emphasis on green cane harvesting, on water resources management and on compliance with environmental regulations in agro-industrial processes.
        3. A positive impact has been the inclusion of funding lines within EC country programmes e.g. through MIPs to support implementation of SEA recommendations. In Jamaica the draft MIP for 2011-13 includes provision within the Cane Expansion Fund for concessionary loans to support green cane harvesting, drip irrigation to prevent salinisation and promote water efficiency. There may also be financial support for renewable energy and energy saving, water resources management and access to carbon financing initiatives. Please see Table 1 in Section 5 for further examples. In Zambia, the MIP 2011-2013 will provide funding for some SEA recommendations including improved management of vinasse (waste from the sugar industry) and revision of EIA procedures to deal with ethanol production. It is important to note that the SEA alone did not bring about such outcomes – these were issues already “on the table” - but it did help to formalise them and support their implementation. Critically, successful integration of key environment issues raised in most SEAs relied upon Delegation (rather than Government) officials to carry forward SEA agendas.
        4. In Guyana the EC has recently signed a €4 million agreement with the Government to fund a mangrove restoration programme which will form part of an overall sea defence strategy. Whilst such a programme was not an SEA recommendation, the SEA did stimulate some discussion regarding the role of mangroves as part of a sea defence strategy.
        5. In Trinidad & Tobago the SEA provided the EU Delegation with a vehicle for a more credible dialogue with the Government regarding, inter alia, environmental and socio-economic considerations to take into account when implementing the National Sugar Adaptation Strategy.
        6. *Influence upon Government policies and programmes* – With some exceptions the SEAs have had less impact in terms of promoting Government ownership and implementation of SEA proposals and recommendations. Stakeholders stated that the SEA had certainly increased environment and climate change awareness in Government circles but that this had not always translated into firm commitments to take action.
        7. In some cases, SEA led to changes in Government policies, plans or programmes. This includes Jamaica, Trinidad and Tobago and Zambia where the governments’ own country strategies for sugar adaptation have integrated some key environmental components. The reviewers believe that this largely came about because of active engagement from EU Delegations to implement the SEA rather than because of direct Government commitment to better integrate environment in their strategies. Nonetheless this is a positive outcome which can be partly attributed to the SEA. It suggests that with increased Government ownership the SEAs could have greater impact upon key policies and plans.
        8. Some Government officials (eg Trinidad & Tobago and Zambia) also highlighted the positive influence of SEA in helping them identify concrete issues and measures to focus on when implementing the sugar strategies. They noted also the value of guidance and support on how to implement these measures (eg study tours in regions to see good practice in management of sugar wastes in Zambia).
        9. Table 4 in Section 8 on key issues and recommendations suggests mechanisms to address some of the challenges identified in this section.

# Discussion

* + - * 1. In this section we draw together key issues and findings in order to create context and a framework for the recommendations proposed in Section 8.
        2. Over-arching this discussion is a recognition that the SEAs reviewed have all had positive influence and impact. This ranges from raising awareness of environment and climate issues in a particular PPP through identification of environmental safeguards to integration of environment concerns in Government or EC strategy documents and funding of initiatives which enhance environmental management and overall PPP outcomes.
        3. Our review identifies six key themes with associated recommendations which impact upon the overall influence and outcome of EC SEAs. These key themes are:
* Increased Focus on Opportunities and Value Added
* Increased Government Ownership
* Integration of SEA and PPP Design
* Focus on Institutional Issues
* Focus on SEA Implementation
* Attention to Climate Change

Detailed recommendations are provided in section 8.

* + - * 1. **Increased Focus on Opportunities and Value Added**

Good examples of SEA processes leading to improved PPP outcomes were identified. Some SEAs helped to “add value” to EC programmes by not only safeguarding the environment but also identifying opportunities where environmental management options also support delivery of wider social or economic goals. Such win-wins are critical if SEAs are to have sufficient impact and influence.

* + - * 1. In addition to ensuring that environmental safeguards are built into EC development programmes SEAs should also add value wherever possible.
        2. Most of the SEAs reviewed were strongest in tackling environmental safeguards and proposing measures so that the PPP in question avoids or mitigates adverse environmental impacts. Where implemented this would ensure that the programmes that the EC supports should be free of negative impacts. A focus on added value, however, requires that the SEA goes further. Therefore, in addition to identifying environmental safeguards, SEA should also build components into the PPP to enhance the outcome of the programme itself and, ideally, to strengthen delivery of the wider set of policies or plans which set the development framework and contribute towards wider government goals (eg poverty reduction or economic growth).
        3. An SEA for an agri-business programme, for instance, may identify measures for environmental mitigation that increase productivity in the agriculture sector but also help to identify opportunities to deliver against wider goals such as poverty reduction or national economic growth. Other examples of added value include: a) water efficiency in sugar production to reduce salinisation of soils but also to reduce costs of water consumption and thus sugar production thereby increasing efficiency and profitability; b) linking mitigation measures for the PPP to wider Government goals eg promotion of renewable energy in sugar sector can help to deliver energy security goals.
        4. In one sense, therefore, “added value” can sometimes be a reflection of how an environmental mitigation measure is presented. If a mitigation measure such as water efficiency in a factor is presented as a measure to prevent ground water depletion it may be viewed as a safeguard but if presented as a safeguard measure plus an intervention to reduce costs of water purchase then it becomes an opportunity delivering clear economic benefits. If SEAs could present more of their findings in such a manner it would help to generate greater interest and buy in.
        5. Table 2 below indicates an idealised scenario illustrating different ways SEAs may contribute towards “value added” in PPPs. Examples are adapted from one SEA (the Jamaica Multi-Annual Adaptation Strategy 2006-2015) to illustrate the scenario.

**Table 2: SEA Influence and Value Added**

|  |  |  |  |
| --- | --- | --- | --- |
| SEA Levels of Influence | Description | Example from Review | Scope for Added Value |
| 1- Environmental Safeguards built into Implementation of the PPP | Identification & implementation of mitigation measures e.g. to avoid or reduce pollution. More likely for PPPs comprising several project components or if SEA starts late. | SEA identifies mitigation measures to implement environmental regulations to prevent pollution at sugar, rum and ethanol factories. | Environmental safeguards reduce pollution. Additionally this may lead to reduced costs eg avoidance of clean up, rehabilitation or avoidance of prosecution costs for pollution incidents making the enterprise more profitable. |
| **2- EC Strategy or Plan adapted to better integrate environment** | e.g. EC Country Strategy Paper or Multi-annual Indicative Plan. | (Draft) EC MIP includes components to fund activities promoting sustainable use of water and energy resources and green cane harvesting | Support for resource efficiency avoids environmental risks whilst promoting efficiency & competitiveness in the sugar industry. |
| 3- Government sectoral PPP adapted to better integrate environment | e.g Government’s own sugar strategy is adapted to take into account key environment issues and indicators. | Jamaican Government’s Country Strategy for Sugar Adaptation (JCS) contains targets to promote water resources efficiency. | Increased water efficiency in the sugar industry reduces depletion of scarce resources and reduces costs of purchase of water |
| 4- Wider Government PPPs adapted to include environment interventions | Government’s national or regional PPPs e.g. Poverty Reduction Strategy Paper (PRSP) into which the sector plan feeds in are adapted to take into account environment issues. | The JCS includes components on renewable energy which feed into National Energy Policy. | Generation of renewable energy from sugar wastes contributes towards increased national energy security goal. |

* + - * 1. At a time when the green economy is an issue receiving considerable attention we believe that some SEAs could play a key role in identifying opportunities to contribute towards making the green economy a reality. This may include identification by SEAs of opportunities for environment interventions which increase productivity and/or profitability – for instance technology interventions which reduce demand and usage of key natural resources including energy, water and raw materials as well as reducing production of waste and pollution. In so doing such interventions can contribute towards wider policy goals such as reduced dependence upon fossil fuels and enhanced energy security or generation of social benefits such as jobs.
        2. If EC SEAs could identify such opportunities it would add value to the overall SEA approach and potentially generate increased interest and buy-in from key decision-makers. To achieve this, guidance from the EC may need to be adapted, TORs for SEAs strengthened to increase focus on value added and the green economy and the skills sets for consultants modified to ensure that teams include experience in identifying not only environmental safeguards entry points but also those which add value. See Recommendations 1, 9a, 9g, 10a, 10e and 2 in Table 4 (section 8).
        3. **Increased Government Ownership**

|  |
| --- |
| Many of the stakeholders interviewed identified limited or lack of ownership as a barrier to both government engagement in the SEA process and implementation of the SEA findings and recommendations. This appeared to be common for most of the SEAs reviewed. One exception seems to be Trinidad and Tobago where early engagement with Government by the Delegation and other factors (eg quality of consultants hired to carry out the SEA, recognition of the importance of taking into account environmental considerations by the Government) had a positive impact in terms of ownership. |

* + - * 1. A number of possible reasons exist for lack of ownership and these include a limited awareness and capacity regarding SEA by Government (and sometimes EC officials), a perception that the SEA is “imposed” by the EC, and limited and tardy consultation between the EC and Government regarding the need for an SEA, its remit, management and resourcing.
        2. Given that the SEA final report is not intended to be the end of the SEA process but rather the start of implementation of the SEA it is critical that levels of ownership increase. A number of recommendations to increase ownership are proposed in Section 8 and these focus upon: liaison between the EC and Government as early as possible regarding the need for an SEA support for SEA awareness and capacity building as part of the SEA process.
        3. The EC has run, since 2005, a programme of training on environmental integration in EC development cooperation (including SEA) at EC headquarters and Delegations, targeting EC staff and partner Government staff. Some 2000 people have been trained in this on-going programme. It is not clear from this review if EU Delegation staff and Government officials involved in the SEAs examined in this study received such training but it would be advantageous in the future to ensure that those involved in an EC funded SEA do participate in such training if possible. The stakeholders workshops undertaken for each SEA are an important mechanism to help raise awareness and develop capacity in SEA but it is likely that the key counterparts for each EC funded SEA may require more targeted capacity building support.
        4. Whilst it is unlikely that the EC can engage in significant levels of awareness raising and capacity building for each SEA undertaken, one cost effective mechanism might be to require the SEA team to provide a specific number of days for such activities through the life of the SEA. Such support could for instance assist Government officials who are the counterpart to an EC funded SEA to develop practical SEA expertise and capacity on-the-job. This might include learning how to practically review SEA documents, how to present the SEA to other government officials and decision-makers and general “on-the-job” training and support. This might involve just a few days but by being a formal requirement of the SEA process would ensure attention was given to this key issue.
        5. Whilst Government ownership is critical it is important that other stakeholders including the private sector, civil society and other donors also engage with the SEA and are brought into discussions and capacity building as appropriate.
        6. **Integration of SEA into PPP Design**

A difficulty experienced in a number of the SEAs was in effectively linking the SEA into the PPP design process. In several cases the need for an SEA was identified before PPP design began but initiation of the SEA was often slow. Key factors contributing towards a lack of integration include: a) separate teams, b) different starting dates for the PPP design and the SEA, and c) lack of formal requirement eg in ToRs for the PPP design team to liaise with the SEA team.

* + - * 1. It should be noted however that the factors above do not apply universally. For instance the SEAs in Trinidad and Tobago and Zambia benefitted from starting after the PPP had begun which, in these instances, allowed it to focus upon concrete proposals emerging from the PPP design process.
        2. The purpose of the SEA is to influence the PPP and so measures to strengthen the integration of the two would be valuable. Recommendations 5 and 9(c) in section 8 set out proposed mechanisms to support better integration of SEA and PPP design processes.
        3. **A Focus on Institutional Issues**

Section 6 identifies the need for SEAs to place greater emphasis on institutional issues including a shift in focus from description to analysis of the institutional framework. The reason for this is primarily that it is the in-country institutions themselves which will be responsible for implementation of the SEA. Therefore it is essential to understand the strengths and weaknesses of the institutional framework in order to propose workable SEA recommendations.

* + - * 1. Key features of institutional analysis might include understanding (not just listing) legal and policy frameworks, institutions with remit to manage the environment directly (eg an Environment Protection Agency (EPA)) or indirectly (eg sector ministries such as agriculture), capacity of such institutions, the relationships between institutions, windows of opportunity to influence decision-making, and incentives and disincentives to promote environmental management.
        2. For example, if an EPA is struggling to implement existing regulations then an SEA recommendation proposing new laws to tackle an environmental issue is unlikely to have much chance of successful implementation unless suitable provisions are put in place to tackle the structural challenges facing the EPA. Yet at least one of the SEAs reviewed did propose such an approach.
        3. Institutional analysis sounds complex and resource intensive. It may however be undertaken at a range of levels and perhaps most important is a need for an **“institutional mindset”** which recognises that technical solutions to environmental problems alone will have limited impact. Instead some understanding of the institutional framework and the institutions involved will assist in identifying approaches which are more likely to have “institutional buy-in” and support for implementation.
        4. Table 3 below sets out some approaches to institutional analysis. These approaches may include reviewing existing documents such as EC and partner government CSPs, World Bank Country Environment Analysis (CEA) or other donor documents to identify key institutional strengths and weaknesses. It may be identifying champions e.g. in Government institutions or Parliamentary Committees– individuals or teams with a desire and motivation to bring about change. Or it might involve reviewing documents and conducting meetings to identify windows of opportunity to influence decision-making.

**Table 3: Some Approaches to Institutional Analysis**

| **Institutional Analysis Approaches** | **Examples** | **Sources** | **Level of complexity** |
| --- | --- | --- | --- |
| Identify access to decision-making | * Identify “windows of opportunity” for mainstreaming environment (eg a PPP that is going to be revised). | Document reviews, meetings, interviews | Simple |
| Analysis of institutional frameworks & capacity to promote sustainability | * Review existing studies which include institutional components eg EC CSPs, World Bank CEA, Poverty and Social Impact Analysis (PSIA), others (eg Southern African Institute for Environmental Assessment biannual reviews of country environmental management systems). | Document review | Simple |
| Review of political capacity to manage environment | * Consideration of political capacity of institutions to influence the environment agenda (ie is the Minister or Permanent Secretary for Environment on key decision-making boards?). Requires understanding of institutional systems and processes and ability to “read between the lines”. | Meetings, review of documents including organ grams | Medium |
| Analytical work | * Environment Public Expenditure Review | Analytical study | Complex |

* + - * 1. In addition to institutional analysis it is essential that all proposals and recommendations outlined in an SEA are “tested” or at least discussed with key stakeholders to determine the level of interest, resources availability and possible timing of implementation. “Testing” recommendations primarily means ensuring that the key “who?, what?, where?, when?, why? and how? questions” of implementation have been considered. This means asking “what needs to be done and why?”, who will be responsible for implementation of the recommendation?, “When should it be undertaken?” etc. In Tanzania a senior government official familiar with the sugar SEA and environment issues in the industry indicated that the recommendations in the SEA had not been presented to his department. This may be exceptional but, given the large number of recommendations in some SEAs, it is likely that not all those proposed have been adequately discussed with key stakeholders. Annex 5 proposes a model for an **Action Plan** which will help to ensure that recommendations are tested with key institutions before being presented in final reports and “next steps” to implementation are set out. Recommendations 6, 9d, 10b and 2 in section 8 also provide ways to better integrate institutional analysis as part of the EC SEA activities.
        2. **Focus on Implementation of the SEA**

A common challenge faced by donors supporting SEAs is how to ensure that the SEA process does not end with the publication of the final SEA report. This is even more a challenge where the level of Government buy-in is low. It is fortunate that with many of the SEAs reviewed the Delegations eg in Jamaica, Mauritius, Trinidad and Tobago and Zambia have been able to find ways to take forward recommendations from the SEA report to support its implementation.

* + - * 1. Several Delegations and some Government officials interviewed however stated that some form of Action Plan which summarised the key findings, listed all recommendations and considered what the next steps towards implementation would be very helpful to assist in taking SEAs forward.

As mentioned above, key components of an “Action Plan” are provided in Annex 5. These constitute the framework for a short and accessible “stand-alone” document with all of the key information to support implementation of the SEA. See also Recommendations 7, 9e and 10c in Section 8.

* + - * 1. **Attention to Climate Change**

Climate change is high on the agendas of Governments, donors and other stakeholders and SEAs provide a potentially powerful tool to support integration of CC issues in PPPs whether it be around adaptation, mitigation, low carbon development or access to climate change finance. Indeed, where Governments are disinterested in SEAs, CC may be a useful vehicle to generate greater interest in the SEA and environmental integration.

* + - * 1. Several of the SEAs took CC issues into consideration in their assessment. These include Guyana where CC will have a potentially significant impact upon sea defences, Mali (impacts related to the transport programme) and several of the sugar reform SEAs including Jamaica, Mauritius, Trinidad & Tobago and Zambia. In the Jamaica and Mauritius SEAs key areas of focus were issues relating to the promotion of renewable energies and the links to carbon financing under the Clean Development Mechanism.
        2. Several of the SEA ToRs did not specifically require attention to CC issues. We assume that this reflects the period in which they were commissioned (eg 2008 where impacts of and on climate change had a less widespread recognition they have now).
        3. All of the SEAs could nonetheless have given greater focus to CC by ensuring that the issue was explored under the lenses of adaptation, mitigation, low carbon development and climate finance as appropriate. Certainly these issues should be more systematically assessed at scoping phase and, if appropriate, considered in detail during the SEA analysis. (See Recommendations 8, 9f and 10d in Table 4 (Section 8)). For instance whilst the Jamaica SEA did refer to climate finance it did not directly explore possible issues relating to impacts of CC upon water resource availability, etc which are likely to influence sugar production. A more systematic approach to managing climate issues in SEAs is thus proposed using scoping to determine if these are key issues and to justify the decision to examine (or not) climate issues in the final SEA report.
        4. **Managing Uncertainty in Climate Change (and environment issues)**

One concern when dealing with CC relates to how to manage uncertainty. Clearly there is much uncertainty regarding CC including the scale, magnitude and frequency of impact all of which may lend itself to in-action. In line with current thinking (eg The World Bank 2006; OECD 2010), we propose that uncertainty relating to climate (as well as other environment issues) is addressed using a risk management approach in which issues of risk, hazard and severity of impact are balanced to determine what approach should be taken.

* + - * 1. A risk management approach can assist decision makers integrate these issues into planning even when there is uncertainty regarding the spatial and temporal nature as well as magnitude of impacts. Risk management matrices were used in the Ghana and Guyana SEAs and whilst they clearly have limitations they can assist in ensuring that climate and environment risks which may not be immediately quantifiable are not forgotten in decision-making processes. An example risk matrix is provided in Annex 4.
        2. **Resource Implications**

The review highlights numerous examples of positive outcomes arising as a result of the SEAs. It also recognises that resources are scarce and, when proposing recommendations, does not argue that significant additional resources should be provided for individual SEAs. Rather, in making the recommendations, we believe that they could, to a large extent, be fulfilled through re-prioritisation of tasks within the SEA process itself.

* + - * 1. For instance most of the SEAs included long, detailed and descriptive sections on environmental baselines including lists of species and descriptions of rainfall patterns. Whilst some was relevant much did not appear to influence the analysis or recommendations in the SEA. In such cases we believe that the resources in compiling such data could be better put to use in other areas such as analysing institutional frameworks, identifying entry points for SEA to influence decision-making or giving more attention to climate change.
        2. A small number of recommendations will require additional resources. For instance: i) Recommendation 11 to provide limited support for Quality Assurance of SEA processes requires that some kind of facility is established which can provide Delegations with access to SEA experts to assist in the design and implementation of SEAs including quality assurance of SEA outputs; ii) Recommendation 4 to build into SEA ToRs a requirement to provide support to raise awareness and provide capacity building in Government.
        3. Given that the resource requirements of the SEAs reviewed ranged from 60 to 200 man days plus the additional time inputs of EC and Government officials it would seem value for money to make available limited additional resources for quality assurance support to improve SEA influence and outcomes. This might require perhaps 3 to 5 days of technical support to Delegations to ensure that SEA process and outputs are quality assured and some 3-10 days for awareness raising and capacity building for Government and other stakeholders.

# Recommendations to Strengthen Sea in ECS Development Cooperation

* + - * 1. Table 4 below highlights the key issues emerging from the review and includes recommendations. Issues and recommendations are prioritised. The key issues which overall impact upon SEA influence and outcome are :
* Focus on Opportunities and Added Value;
* Increased Government Ownership;
* Integrated SEA and PPP Design;
* Focus on Institutional Issues
* Focus on SEA Implementation; and
* Attention to Climate Change.
  + - * 1. In addition a series of recommendations for key supporting measures are proposed. These are mainly tools and approaches which will contribute towards strengthened SEA outputs and outcomes. These are:
* Improved ToRs;
* EC SEA guidance complemented;
* Improved quality assurance;
* Improved presentation and communication;
* Attention to alternatives, and cumulative and indirect impacts;
* Focus on Monitoring and Evaluation.

Details and justification for these recommendations are provided in Table 4.

* + - * 1. The key issues and associated recommendations are best considered collectively. For instance placing greater emphasis in the SEA on identification of opportunities and value added which assist with wider Government objectives (see Issue 1, Rec. 1-2) will help to generate increased buy-in from Government (Issue 2, Rec. 3-4).

**Table 4: Summary Table of Key SEA Issues and Recommendations**

| 1. **Key Issues & Recommendations Impacting Upon Overall SEA Influence & Outcomes** | | |
| --- | --- | --- |
| **Issue** | **Description & Justification** | **Recommendation** |
| 1. **Focus on Opportunities & Added Value** | A key question amongst EC and government stakeholders is “to what extent will the SEA actually help to strengthen the quality, the outputs and outcome of the PPP in question?” ie to what extent does the SEA “add value?”  Value added requires identifying measures beyond environmental safeguards which enhance the overall goals and objectives of the PPP itself and, where possible, support wider goals such as poverty reduction.  Most SEAs address the issue of environmental safeguards in detail but give less attention to the role of environment as a vehicle to help deliver growth and poverty objectives in the context of sector priorities.  There is a tendency for the SEAs to focus on negative impacts. Interviewees commonly stated a desire to see environmental problems “re-cast” as opportunities adding value to the proposal.  For example, all sugar SEAs identified significant pollution problems & challenges accessing energy & water at sugar mills. Many SEAs recommended regulatory approaches to tackle the problems rather than advocating opportunities using clean technology and environmental management systems to increase productivity, efficiency & competitiveness. Such approaches might encourage Government and private sector interest and buy-in to SEAs.  All of the SEAs included a mix of international and national experts but some interviewees expressed concerns that SEA teams did not always have the right skills sets. For instance economic skills in Ghana and energy expertise in Mauritius could have helped align SEA outputs to Government sector priorities.  Most SEAs comprehensively analysed adverse bio-physical impacts in the PPPs assessed but coverage of social and economic issues was patchy.  Linking environment to socio-economic priorities of government is a potential entry point for SEAs to demonstrate “value added” and garner government support.  Assessment of trade-offs between environment and socio-economic issues was limited. For instance, whilst closure of sugar mills will certainly reduce pollution the consequences of job losses will be more profound and approaches to reduce pollution through cleaner production which protects jobs would be preferable.  The Ghana SEA was unusual in that it did raise issues of poverty and livelihoods in relation to transport policy repeatedly but it is not clear that this actually influenced policy. | **Rec. 1: Focus on Opportunities & Added Value**  SEA outputs should in addition to i) identifying environmental safeguards place greater emphasis on opportunities to ii) support delivery of social, economic & environmental benefits within the PPP itself and iii) support delivery of wider Government goals beyond the PPP eg PRSPs.  ***Related Recommendations:***  ***-See Rec 9(a) and 9(g) on Improved SEA ToRs.*** *ToRs should require that SEA focuses on opportunities, added value and environmental safeguards, and place greater emphasis on assessment of socio-economic issues.*  ***-See Rec 10(a) and 10(e) on EC SEA Guidance.*** *Guidance should be updated or complemented to emphasise the EC’s expectation that SEAs should demonstrably “add value” to proposals. Guidance should include a range of examples at high level policy as well as at lower level programmes. It should also provide additional emphasis on identification of “green economy” entry points through assessing and balancing linkages and trade-offs between environment and socio-economic concerns.*  **Rec. 2: SEA team composition**  Teams should encompass a suite of skills to address environmental issues and link these to opportunities to deliver social and economic as well as environmental benefits. This may require that team members, both national and international, have expertise in environment but also some level of expertise in economics, institutional analysis, climate change, socialdevelopment or sector specialisms eg energy as appropriate for the PPP in question. In providing such expertise the SEA team should be able to link the SEA to the Government’s national development and sector priorities as well as add value within the PPP itself. |
| 1. **Increased Government Ownership** | Ensuring adequate Government ownership was a big challenge in most of the SEAs reviewed.  Most interviewees acknowledged minimal government input during or after the SEA process. Causes include perceptions that SEAs are externally imposed, will delay or add costs to the proposal and add no value, as well as issues such as lack of resources, awareness of, or capacity in environment integration and limited Government involvement in determining the need for an SEA and its design. Weak Government ownership limits SEA influence and outcome potential, and has significant repercussions for SEA implementation.  Issues of SEA ownership and post-SEA report implementation are linked to capacity in Government and in Delegations to work with new tools such as SEA. Many interviewees felt that Government (and sometimes EC officials) awareness and capacity to manage SEAs was limited. | **Rec. 3: Early EC Engagement with Government**  Early liaison, initiated by the EC, with Government to develop Government buy in to SEA is recommended.  It should involve inclusion of Government (including Finance, sectors ministries, local Governments as appropriate) in decisions as to whether to undertake an SEA or not (screening exercise), the drafting of TORs, recruitment of consultants and oversight of the SEA. It may also include working with other stakeholders including donors, private sector and civil society.  **Rec. 3(a)**: To support delivery of Rec 3 the EC should consider trialling an SEA decision process in-country in which the active interest (e.g. Government demand for an SEA) and capacity (e.g. existence of counterpart staff with awareness training or practical experience in SEA) of Government – in the relevant sector as well as Environment Ministries – is taken into account before a decision to undertake an SEA is made.  **Rec. 4: Awareness & Capacity**  All SEAs should include a specific component for practical “on-the job” SEA support to include awareness raising, capacity building and generation of “buy in” for SEA in Government and relevant stakeholders institutions. This form of “SEA mentoring” may be delivered by the SEA consultants over a specified number of consultant days. This would build upon stakeholders workshops which form part of all SEAs but be tailored to key staff involved with the SEA and focus upon practical delivery and implementation of the SEA e.g. what to look for when reviewing SEA outputs, how to present key SEA findings to senior officials.  The decision as to which future EC PPPs should be subject to SEA might also take into account the delivery of capacity building in SEA by other donors thus ensuring that a minimum level of awareness and capacity already exists.  ***Related Recommendations: see Rec. 9(b) on Improved SEA ToRs*** *related to awareness raising and capacity building.* |
| 1. **Integrated SEA & PPP Design** | Some SEAs suffer because they are not fully integrated within, and have little influence upon the PPP design process.  Several SEAs began once the PPP was already under design and even nearing completion although screening had identified the need for an SEA relatively early.  Most stakeholders felt that this limited the potential of the SEA to add value and integrate environment into the proposal.  A later start for SEAs may be beneficial if it ensures that there is sufficient material for the SEA team to assess – this was the case in T&T where the SEA was able to influence implementation of the Sugar Adaptation Strategy. In general however it was felt that an earlier SEA start would have led to better results. Where the SEA outputs were timely, such as Guyana, it appears that this assisted in influencing PPP design.  ToRs sometimes make no link between the two processes. The frequent lag between the PPP design and the SEA commencing means the SEA team are often “catching up” with the design process.  Benefits of maintaining separate PPP design and SEA teams in terms of ensuring independence of environmental assessment are often significantly offset by failure to integrate SEA findings into the PPP especially if the SEA outputs are not timely. | **Rec. 5: Better Integration of PPP Design & SEA**  This should include options to: a) timetable both to commence simultaneously where appropriate and b) where the EC is supporting the SEA and PPP design to let both elementsas one tender with no separation of the two components. Even where the EC does not provide support to PPP design it should be an aspiration in early discussions and negotiations to integrate SEA and PPP design as closely as is practically possible.  ***Related Recommendation: see Rec 9(c) on Improved SEA ToRs.*** *ToRs for PPP design and SEA should be crossed referenced and clearly set out responsibilities for integrated working*. |
| 1. **Focus on Institutional Issues** | Understanding the strengths and weaknesses of the institutional framework in which the PPP is set is essential to ensure that an SEA has impact.  Key institutional issues include the legal and policy framework, resource availability and capacity to implement law and policy, as well as the incentives and disincentives for stakeholders to implement SEA recommendations. Analysis might also identify environment or SEA champions, institutional processes which offer entry points such as planned policy reviews, inter-ministerial committees on environment, etc.  Few SEAs provided more than a basic description of the institutional framework. As a result, many recommendations (whilst technically sound) do not consider the actual capacity and/or inclination of institutional stakeholders to implement them.  For instance recommendations in one sugar SEA for new environmental regulatory powers ignore documented critiques of the EPA’s incapacity to implement existing laws.  Some ToRs require “description” rather than analysis of institutional issues. A more analytical approach would assist in ensuring recommendations are framed within the political economy of the PPP in question. | **Rec. 6: Increased Emphasis on Institutional Analysis**  The EC should place greater emphasis on institutional analysis within SEAs to help identify SEA entry points and opportunities and to frame recommendations and next steps. This should also ensure that the SEA documents that recommendations have been deliberated with relevant stakeholders, that the interests and willingness of these stakeholders to implement recommendations have been checked and their ability to implement recommendations determined.  ***Related Recommendations:***  ***-See Rec. 9(d) on Improved SEA ToRs.*** *ToRs should require strong institutional analysis which forms a framework for identification of opportunities & entry points for the SEA and its recommendations.*  *-****See Rec 10(b) on EC SEA Guidance.*** *The EC SEA Guidance should provide more information on the role of institutional analysis in SEA including concrete examples to demonstrate its importance in affecting SEA outcomes*.  -***See Rec 2 on SEA Team Composition.*** *SEA team profiles should include skills & experience in institutional analysis drawing upon both national and international expertise.* |
| 1. **Focus on SEA Implementation** | Stakeholders felt that some SEAs contained “wish lists” – long lists of recommendations which were not prioritised, costed nor linked to sectoral priorities.  For some recommendations it was not clear where institutional responsibility for implementation lay.  Concern was expressed about recommendations proposing extensive further studies, new regulatory powers for EPAs, provision of unrealistic levels of training and capacity building & proposing follow up EIAs. All of these may be appropriate where there are sufficient capacity & resources but in the context of the SEAs reviewed could be considered unrealistic.  The Ghana SEA attempted to provide some indication of the financial costs for some recommendations proposed and whilst helpful these were probably under-estimated.  Interviewees indicated concern that many recommendations were generic and too vague to be implemented. They stated a need for recommendations which are specific and clear indicating who should do what, why, when and how?  In Tanzania one key and senior stakeholder was not aware of certain recommendations made in an SEA and involving his organisation which suggests that some SEAs and their recommendations are not widely discussed before presenting in the final report.  Whilst it is important that recommendations have been “tested” with those responsible for implementation ie discussed with stakeholders and checked for potential to implement, it is equally important that SEAs do maintain their independence. Consultants should not shy away from proposing challenging recommendations (and government and EC may not agree with them all) but in the final report it should be clear that they have at least been discussed with stakeholders first. | **Rec. 7:**  **SEA Action Plans**  It is recommended that a stand-alone Action Plan including next steps should be a key output from each SEA to support decision-makers in implementation of key SEA findings. Actions Plans should contain information including key issues, prioritised actions and recommendations, timetables, resource implications, ownership, likely estimated costs and benefits (see Annex 5 for more information). In addition it should be demonstrated that recommendations have been presented to stakeholders before submission and their feedback taken into account. The key issue here is that when recommendations are proposed then consideration is also given to their practical implementation.  ***Related Recommendations:***  ***-See Rec. 9(e) on Improved SEA ToRs.*** *ToRs should**require a “stand alone” Action Plan including prioritisation of recommendations and next steps for Government, EC and other stakeholders.*  ***-See Rec 10(c) on EC SEA Guidance.*** *EuropeAid should provide guidance or examples which demonstrate good practice in implementing SEA recommendations including use of Action Plans.* |
| 1. **Attention to Climate Change** | Climate change is currently a high profile issue and one which is stimulating wider interest in environment issues. It presents an opportunity to increase interest in SEA.  The review authors note that many of the SEAs were commissioned and undertaken before CC issues were considered as important as they are now. In addition concerns about how to manage CC uncertainty including the scale, magnitude and frequency of impact might have led to in-action. Nonetheless we feel that it is important that some of the gaps identified are noted and recommendations proposed.  Some SEAs did address CC issues. For example, the Jamaica and Mauritius SEAs explored links to reduced carbon emissions in the sugar industry through cogeneration of electricity from waste but the Tanzania sugar SEA did not although this has been a topical issue in the country for some time. The impact of climate change upon sugar production and water resource availability was not explored in detail. All of the infrastructure SEAs took climate issues into account to some extent.  Overall most of the SEAs did not place as much emphasis on climate change as might have been expected and, according to interviewees, did not provided sufficient detail to fully justify further action. CC is a key development challenge and future SEAs will need to address it head on.  For several SEAs, CC was not raised as an issue in the ToRs. | **Rec. 8: More Emphasis on Climate Change**  SEAs should place CC in a more central role .As appropriate, this should emphasise identification of opportunities to a) integrate adaption, mitigation and low carbon development within PPPs; b) access to climate change finance and c) use CC as a tool to generate key stakeholder awareness and interest in the SEA.  ***Related Recommendations:***  ***-See Rec 9(f) on Improved SEA ToRs*** *ToRs should ensure adequate attention is paid to climate change including issues or adaptation, mitigation, low carbon development and climate finance.*  ***-See Rec. 10(d) on EC SEA Guidance****. EuropeAid Guidance should provide additional emphasis on management of climate change* *risks and opportunities, the* *use of risk management approaches (for example, see Annex 4) to deal with uncertainties related to CC impacts and opportunities to access climate change finance.* |

| 1. **Additional Issues with Recommendations to Support Improved Quality of SEA Outputs and Outcomes**   *These issues (largely tools and approaches) are important in influencing the quality of the SEA process and reports which if done well should influence the overall intended outcome to strengthen the policy or proposal through better integration of the environment and climate change.* | | |
| --- | --- | --- |
| **Issue** | **Description and Justification** | **Recommendation** |
| **1. Improved ToRs** | For each of the SEAs in this study, the associated ToRs were also reviewed. Overall the quality of the ToRs was good but, for some issues, there is scope to improve them. This will help to ensure that certain issues are clearly addressed or, for others, that greater emphasis is placed upon them. | **Rec. 9:**  **Improved SEA ToRs**  ToRs for EC SEAs should be revised so that SEA teams consider, **as appropriate** e.g. in scoping phase, the need to :  **a.** Focus on opportunities and added value as well as environmental safeguards;  **b.** Include a component to support awareness raising, capacity building and generation of “buy in” for SEA in Government and relevant stakeholders institutions to be delivered by the SEA consultants over a specified number of consultant days;  **c.**  cross referenced to the ToRs for PPP design to promote integrated working wherever this is practicable;  **d.** Require strong institutional analysis which forms a framework for identification of opportunities & entry points for the SEA and its recommendations;  **e.** Require a “stand alone” Action Plan including prioritisation of recommendations and next steps for Government, EC and other stakeholders;  **f.**Ensure that adequate attention is paid to climate change including issues of adaptation, mitigation, low carbon development and climate finance;  **g.** Place greater emphasis on the need for SEA teams to endeavour to link environment to socio-economic priorities such as livelihoods and jobs, health and well-being and balance of the linkages and trade-offs between the environmental, social and economic considerations of the PPP;  **h.** Set out more specific requirements regarding the presentation of SEA reports including as a minimum a need for a stand alone or action plan, report length, and minimum design and layout standards (including referencing, listing of acronyms, minimum font size);  **i.** Reinforce the need for the SEA to propose alternatives wherever this is relevant and ensure that where possible the SEA commences early enough in the planning process to permit identification of alternatives and their discussion with the design team;  **j.** Stress the importance of defining & addressing indirect and cumulative impacts where appropriate;  **k.** Emphasize requirement for realistic and implementable M&E linked to the SEA recognising resource constraints and potential to link M&E to existing or planned monitoring systems.  Not all of the issues raised above will be relevant for all SEAs but their consideration will help to strengthen the quality and influence of SEA processes and outputs. In this regard, it is important that generic EC ToRs for SEA be appropriately adapted to fit the context of the PPP in question. |
| 1. **EC Guidance on SEA  complemented** | EuropeAid Guidance on the Integration of Environment and Climate Change is an excellent source of information and support for EU Delegations (and other stakeholders). The review however highlights a need for SEAs to give more attention to a number of key issues including a focus on opportunities and added value, institutional analysis, the implementation of SEAs.  To this end some additional guidance would be beneficial to set out EC expectations in these areas. | **Rec. 10: EC Guidance on SEAs**  Guidance should be updated or complemented to provide additional emphasis, including concrete examples, on the following issues:  **a.** Opportunities and Value added;  **b.** The role of Institutional Analysis;  **c.** Implementation of SEAs and Action Plans;  **d.** Climate Change *(including use of risk management approaches);*  **e.** Assessing and balancing linkages and trade-offs between environment and socio-economic concerns;  **f.** Identifying and assessing alternatives & cumulative & indirect impacts |
| 1. **Improved quality assurance** | All of the SEA reports included their ToRs in an annex. A surprisingly large number did not adhere to the TORs in terms of issues covered in the final report.  Typically, institutional review, consideration of socio-economic issues, identification of alternatives and analysis of indirect and cumulative impacts were issues most likely to be ignored.  EC officials and Government staff noted that they find it difficult to review SEAs because they are such big documents and appear very “technical”. In addition many officials do not have sufficient experience to benchmark the quality of SEAs. The level of quality assurance is thus variable. | **Rec. 11:**  **Support for SEA Quality Assurance**  It is recommended that EuropeAid considers the provision of (limited) support to improve the quality of SEA documents using in-house or external SEA experts to help EU Delegations and Governments prepare ToRs, review and quality assure SEA reports and provide guidance on SEA process, outputs and outcomes. |
| 1. **Improved presentation & communication** | Quality of presentation of the SEAs was variable but characterised by lengthy reports with a strong technical focus – issues of concern to the non-specialists responsible for reviewing and implementing the SEAs.  All the SEAs reviewed were large documents of around 100 pages or more plus annexes, with some putting too much emphasis on description rather than analysis. Summaries were themselves lengthy and recommendations were sometimes “buried in a mountain of words”. Only some provided a summarised list or table of key issues and recommendations. Presentation and layout made some very difficult to access. | **Rec. 12: Improved Presentation**  Increased emphasis should be placed on ensuring accessibility and “usability” of SEA outputs to key stakeholders and particularly those responsible for implementation. This requires that SEAs should include an Action Plan, define maximum document lengths, minimum design and layout standards (including referencing, listing of acronyms, minimum font size), and focus on analysis rather than description.  ***Related Recommendation: see Rec 9(h) on Improved SEA ToRs***  *ToRs should place greater emphasis on minimum SEA presentation standards so that it is adhered to by all SEA consultants.* |
| 1. **Attention to alternatives & Cumulative & Indirect Impacts** | One key added value of SEA is to help identify alternatives.  Several of the SEAs reviewed did not identify any potential alternatives or, if they did, did so in only a partial manner. For instance, in Guyana, alternative sea defence alignments were discussed in the SEA but not proposed in recommendations. In addition where alternatives were identified they were not always assessed for their environmental impacts.  Reasons for lack of attention to alternatives include issues of timing - where the SEA commenced after the policy/plan was completed, or because the SEA team was not integrated with the PPP design team and also to the PPP itself which did not always lend to identification of high level alternatives. Many SEAs did not adequately address issues of either cumulative or indirect impacts.  A key distinction and benefit of SEA is potential to address cumulative impacts. For the infrastructure SEAs reviewed the cumulative impacts of individual roads and flood defence projects could be significant but were not adequately addressed. Indirect impacts were more frequently explored, for instance in Mauritius where the implications of reform for tourism and agriculture development were assessed. | **Rec. 13:Greater focus on alternatives and cumulative and indirect impacts**  The EC should: i) ensure that where possible the SEA commences early enough in the planning process to permit identification of alternatives and their discussion with the design team; ii) explore the scope for and, where appropriate, propose alternatives to feed into PPP design; and iii) ensure that appropriate attention is given to identification and assessment of cumulative and indirect impacts.  ***Related Recommendations:***  **-*See Rec. 5 on better integration of PPP design & SEA.***  *SEA and the related PPP should be timetabled to commence simultaneously wherever this is possible.*  ***-See Rec 9(i) and 9(j) on Improved SEA ToRs.*** *ToRs should identify assessment and management of alternatives and cumulative and indirect impacts as important issues to be addressed within SEAs.*  ***-See Rec. 10(f) on EC SEA Guidance****. Guidance should provide additional emphasis (and provide examples) on necessity to identify and assess alternatives as well as cumulative & indirect impacts.* |
| 1. **Focus on M&E** | Most SEAs include a series of performance indicators. These ranged from indicators to monitor annual increase of land area under green cane harvesting to those requiring the completion of studies.  Often, however so many indicators were proposed that it seems unlikely that they could be implemented. Mechanisms for implementing the indicators (e.g. links to existing data gathering and related costs) were not usually proposed. | **Rec. 14: Appropriate M&E**  The EC should ensure that M&E in SEAs is more systematically addressed and that proposed monitoring systems are realistic and implementable. SEAs teams when presenting M&E systems should be mindful of resource constraints and link any M&E to existing or planned monitoring systems rather than creating new and costly ones.  ***Related Recommendation: see Rec 9(k) on Improved SEA ToR.*** *ToRs should emphasize requirement for realistic and implementable M&E.* |

# Conclusion

* + - * 1. SEAs have been employed by the EC in development cooperation for some four years.
        2. In a relatively short time frame since being introduced as a development tool, SEAs have contributed positively towards environmental integration in EC development programmes by:

1. increasing awareness and debate about environment and CC in PPPs (all SEAs reviewed);
2. promoting of environmental safeguards in the implementation of PPPs to avoid adverse environmental impact in EC funded programmes (the majority of SEAs reviewed);
3. integrating environment in related EC strategic plans e.g. finance Agreements & MIPs (Jamaica, Mauritius, Tanzania, Zambia); and
4. integrating environment in partner Government related PPPs (e.g. Jamaica, Zambia).
   * + - 1. The “ceiling” or challenge in achieving the four outcomes above rises as one moves from i) to iv).

A fifth goal could be added:

1. integration of environment into associated or higher level PPPs eg national economic development plans or PRSPs.
   * + - 1. This review concludes that SEAs have overall contributed positively towards EC development cooperation with the majority achieving outcomes in i) and ii) and many in iii) with a limited number achieving outcomes in iv). The challenge for the EC is maximise the impact of SEAs at levels i) to v) inclusively.
         2. Much of the success to date rests with the commitment of officers in EU Delegations actively engaging with Government to promote implementation of the findings of the SEAs. To gain maximum benefits from SEAs in future it is essential that effort is put into increasing levels of SEA ownership by Governments. The report proposes several recommendations to achieve this but early consultation by the EC with Government to involve them in SEA screening to determine if an SEA is needed or not plus follow up on SEA design and implementation is crucial for developing increased ownership.
         3. Ensuring that SEAs deliver more than just environmental safeguards is also important. There are good examples from the review where SEA approaches have added value to the overall PPP by promoting mitigation measures which also deliver social and economic benefits. Such approaches to SEA should become the norm.
         4. Greater analysis and emphasis of institutional issues will help to ensure that the SEA is grounded in the political and institutional reality in which the PPP sits. It is unrealistic for SEAs to simply address technical environmental issues and ignore the institutional challenges hindering sustainable management of the environment in the country in question. This means that the SEA and its recommendations need to take into account issues of capacity and willingness to improve management of environmental resources and provide tactical insights and identify entry points which offer opportunities to promote integration of environment in PPPs.
         5. Some SEA teams struggled to influence the design of the PPP that they were assessing and a drive to better integrate the PPP design and SEA processes would be beneficial wherever it is possible to do so. So too, would be an expectation for all SEAs to move from production of wish lists of recommendations to a more rigorous Action Plan. A “stand-alone” Action Plan would set out prioritised recommendations, anticipated outputs, details of responsibility for implementation, a timeline, resource implications and next steps to ensure their implementation. The report provides an outline example in Annex 5.
         6. Climate Change is now recognised as posing a great challenge to development. Whilst this review identified some SEAs which addressed climate issues, our overall conclusion is that much more emphasis should be placed – certainly at scoping phase – on a range of climate issues from adaptation, to mitigation, low carbon development and access to climate finance to determine if these require assessment or not. Given current political interest in climate issues it might also help to generate additional interest in the SEA.
         7. The recommendations set out in Section 8 of this report aim to identify opportunities to build upon the solid foundation of SEAs in EC development work to date. This recognises the benefits achieved by the SEAs themselves and the quality of SEA Guidance provided by EuropeAid. If these recommendations are embraced we believe that SEA has a strong and very promising role to play in promoting integration of environment and climate issues in EC development cooperation.
         8. This study reviewed eight SEAs out of a total of approximately 20 undertaken by the EC over the past four years. The SEAs reviewed were reasonably diverse in terms of country context, the type of PPP assessed, the institutional framework, methodological approach and levels of input. We therefore feel that the review gives a strong indication of the state of SEA in EC development cooperation.
         9. Some 25 CSPs under the 10th European Development Fund (2008-13) include commitments to employ SEA as a development tool and it is therefore likely that the number of SEAs commissioned by the EC will rise significantly. The conclusion of this review is that emphasis should now be placed on strengthening SEA processes – building on and re-inforcing the existing strengths and addressing the weaknesses identified in this review. The recommendations set out in this report provide clear entry points for consolidating and strengthening SEA practice in EC development cooperation.
         10. In order to support implementation of the recommendations outlined in the review, the EC may want to carry out the following next steps:

* Arrange meetings/workshops/other processes with key staff within the EC (and some external experts eg former EC Environmental Integration Advisory Services staff and perhaps one or two other donors) to consider the report and determine how/whether the EC wishes to take forward the recommendations;
* Review the 14 recommendations in the report to determine which should be considered for implementation;
* Determine priorities for strengthening SEAs and develop a work plan on how to do so;
* Consider more joint donor work on SEAs in order to promote common approaches for SEA as advocated by the Paris Declaration on Aid Effectiveness;
* Consider those PPPs for which alternative approaches to SEA may be more appropriate. This might involve the production of strategic guidance on environmental integration backed up by in-country technical assistance to support implementation;
* Review and evaluate progress in implementing the findings of this review in the short term (after one year) and the medium term (after four or five years).

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# List of Annexes

**ANNEX 1:** SEA Evaluation Grid

**ANNEX 2:** Questionnaire

**ANNEX 3:** Stakeholders consulted

**ANNEX 4:** Example of a Risk Management Matrix

**ANNEX 5:** Example of an SEA action plan

# Annex 1: SEA Evaluation Grid

**Rating scheme:** Response toeach evaluation question is provided using the following ratings and justified in the commentary box:

Y = Yes

P = Partially

N = No

U = Unclear

N/A = Not Applicable

| **Evaluation Questions** | **Rating & Commentary** |
| --- | --- |
| **1. SEA COMPLIANCE, RELEVANCE & CONSISTENCY** | |
| * 1. Was the SEA justified (relevant) given the nature of the policy   or programme supported by EuropeAid? |  |
| 1.2 Does the SEA (process/report) comply with:  a) the requirements set out in its ToRs &  b) EuropeAid’s Guidance on SEAs[[2]](#footnote-2)?  *For questions a) and b) specify which ToRs’ requirements (if any) are not met.* |  |
| **2. QUALITY OF THE SEA** | |
| **2.1 The SEA report** | |
| 2.1.1 Is the information & analysis provided in the SEA report clearly set out & sufficient to support informed decision-making |  |
| 2.1.2 Is there justification for the recommendations made in the SEA report? e.g. for the selection of a preferred alternative or the acceptance of any significant trade-offs? |  |
| 2.1.3 Is the methodological approach used to carry out the SEA properly described & justified? |  |
| 2.1.4  Are uncertainties, assumptions or value judgements relating to the assessment identified &/or justified? |  |
| 2.1.5  Does the SEA effectively:  a) assess & balance the linkages &/or trade-offs between environmental, social & economic considerations relating to the proposal?; &  b) make recommendations which enhance the socio-economic dimensions of the proposal? |  |
| **2.2 The  SEA Process** | |
| 2.2.1 Are the following core SEA components addressed? |  |
| a) Description of the purpose of the SEA including relevant regulations, policies, directives & guidelines |  |
| b) Scoping to identify key issues & impacts to be analysed |  |
| c) Establishment of environmental baseline |  |
| d) Identification & description of potential alternatives to the proposal |  |
| e) Description & assessment of significant environmental impacts (including positive & negative, direct & indirect, cumulative) & potential opportunities presented by the proposal & its alternatives |  |
| f) Provision of decision-makers with practical & implementable recommendations regarding alternatives, mitigation & enhancement opportunities as appropriate. |  |
| g) Presentation of a Monitoring & Evaluation framework including appropriate indicators |  |
| 2.2.2 Was the SEA conducted in a timely manner which supported decision-making processes? |  |
| 2.2.3 Is sufficient attention given to institutional analysis & assessment in order for the SEA to effectively address institutional constraints & opportunities? |  |
| 2.2.4 Does the SEA address potential synergies or conflicts between the proposal & other relevant policies, plans, programmes or projects & make appropriate recommendations? |  |
| 2.2.5 Are issues of Climate Change addressed in the assessment & are recommendations regarding mitigation, adaptation & low carbon development included as appropriate? |  |
| **2.3 Consultation & Participation** | |
| 2.3.1 Is there evidence of meaningful opportunities for stakeholder engagement in the SEA process (including for less powerful stakeholders)? |  |
| 2.3.2 Are the inputs of stakeholders/public involved or consulted in the SEA incorporated in the final report? |  |

|  |  |
| --- | --- |
| **3. INFLUENCE & OUTCOME** | |
| 3.1 Are there mechanisms in place to ensure SEA recommendations are implemented? e.g. management plans |  |
| 3.2 Is responsibility for implementing recommendations attributed to specific institutions or individuals? |  |
| 3.3 Is consideration given to resources (eg human, financial resources) needed to implement SEA recommendations? |  |
| 3.4 Is there evidence that the SEA influenced the design, decision-making or implementation processes? e.g. did the SEA lead to any changes to the EC support programme’s formulation and to the development process of the country’s policy or programme?; Did it make them more sustainable? |  |
| 3.5 Are other (indirect) benefits from the SEA discernable? e.g. increased capacity or environmental awareness, institutional reform. |  |
| 3.6 Is there evidence of working co-operation between the SEA team & those responsible for developing &/or implementing the proposal? |  |
| 3.7 Is there evidence of ownership of the SEA by stakeholders including Government Ministries, EU Delegations etc? e.g. implementation of recommendations, allocation of resources? |  |

# Annex 2: Questionnaire

**Background**

For some four years, the European Commission (EC) has been promoting the application of Strategic Environmental Assessment (SEA) as a key tool to address environmental sustainability concerns in relation to planned support for policies, programmes and large plans, and to improve overall development outcomes. EuropeAid now considers it an opportune time to take stock of EC experiences in using SEA and to draw out lessons which will be used to determine how to employ SEA most effectively in the future.

Two consultants, Jean-Paul Penrose and Nathalie Risse have been contracted to conduct this Review of SEAs and would be grateful if you would spare a little time to answer the questions below. Your answers may be as short or long as you like!

Please would you complete this questionnaire and return itto **Jean-Paul Penrose (jppenrose@gmail.com) and Nathalie Risse (risse.nathalie@gmail.com) by email by Friday 23 July 2010.**

|  |
| --- |
| **Contact Details - This information will be kept confidential** |
| Name: |
| Organization: |
| Email: |
| Telephone number: |
| **1. In which of the following SEAs have you been involved?** |
| a) SEA of the sugar reform accompanying measures for Tanzania (2007-2010) |
| b) SEA of the implementation of the National Sugar Adaptation Strategy for Trinidad and Tobago |
| c) SEA of the sugar sector in Zambia |
| d) SEA of the implementation of the Multi-Annual Adaptation Strategy 2006-2015 of Jamaica |
| e) SEA of the implementation of the Multi-Annual Adaptation Strategy for the Mauritian sugar cane cluster (2006-2015) |
| f) SEA of the Sea Defences Sector Policy in Guyana |
| g) SEA of the Transport Sector Programme in Mali |
| h) SEA of the Transport Integration Plan of Ghana |

***Please answer the following questions as best as you can and, if you are able to, please provide examples. If you have been involved in more than one of the SEAs (see question 1) please specify for which one your answers apply.***

|  |
| --- |
| **2. On what basis was a decision to carry out an SEA undertaken?** |
|  |
| **3.  In your opinion, did the SEA help better integrate environment into the EC support programme and/or into the country strategy/policy/plans, and added value to those overall?** |
| **a) Fully**  **b) To some extent**  **c) Insufficiently** |
| **4. Can you provide any examples of concrete measures taken as a result of the SEA?** *Eg did the SEA lead to specific activities being integrated in the design of the EC programme, help identify indicators to monitor performance, directly influence the formulation of the sector policy, lead to environmental sustainability issues being addressed in the policy dialogue, etc.?* |
| **Yes, fully** |
| **5.  Did the SEA have any other direct or indirect impacts?** *Eg increased environmental awareness or capacity, institutional changes, etc* |
|  |
| **6. What were the main constraints and challenges encountered in conducting and/or implementing the SEA?** *Eg resources availability, timing of the SEA, ownership, participation, coordination, etc.* |
|  |
| **7. What are in your opinion the key lessons learned from the study and what suggestions would you make to improve the tool and the way in which it is applied?** *(Eg methodology, issues to be addressed, process, etc…)* |
|  |

# Annex 3: Stakeholders consulted

**Table 1: List of stakeholders consulted for each SEA reviewed**

| **SEA** | **Name, position and organization** | |
| --- | --- | --- |
| **Jamaica – *SEA of the implementation of the Multi-Annual Adaptation Strategy 2006-2015*** | **Mr Federico Berna**  1st Secretary Development , Delegation of the European Union to Jamaica | |
| **Mr George Callaghan**  Head of the Sugar Transformation Unit | |
| **Mauritius – *Implementation of the Multi-Annual Adaptation Strategy for the Mauritian Sugar Cane Cluster (2006-15)*** | **Dr Tjasa Zivko**  Attaché, Delegation of the European Union to Mauritius | |
| **Dr Kassiap Deepchand**  Head of the Sugar Technology Department at the Mauritius Sugar Industry Research Institute | |
| **Tanzania – *SEA of the Sugar Reform Accompanying Measures (2007-10)*** | **Ms Ana-Margarida Mariguesa**  Attaché, Delegation of the European Union to Tanzania |  |
| **Mr Matthew Kombe**  Director General of the Sugar Board of Tanzania |  |
| **Trinidad & Tobago – *SEA of the implementation of the National Sugar Adaptation Strategy*** | **Ms. Kathrin Renner**  Acting Chargé d’Affaires  Delegation of the European Union to Trinidad & Tobago |  |
| **Mr. Deosaran Jagroo**  Chief Executive Officer (CEO)  Caroni 1975 (Ltd)  Trininad & Tobago |  |
| **Ms. Marisa Clarke Marshall**  Assistant Manager-Environmental Assessment  Technnical Services Department Environmental Management Authority  Government of the Republic of Trinidad and Tobago |  |
| **Zambia – *SEA of the sugar sector (Zambian National Sugar Strategy – ZNSS)*** | **Mr. Matthew Brooke**  Head of Section - Regional co-operation  Delegation of the European Union to the Republic of Zambia |  |
| **Ms. Stéphanie Rousseau**  Programme Officer - Regional Cooperation/Sugar Accompanying Measures  Delegation of the European Union to the Republic of Zambia |  |
| **Ghana – *SEA of the Transport Integration Plan*** | **Mr Cédric Merel**  Attache, Delegation of the European Union to Ghana | |
| **Mr Jonathan Allotey**  Executive Director, Ghana EPA | |
| **Ms Christine Asare**  Director, Ghana EPA | |
| **Mr Sean Doolan**  Climate Change and Environmental Governance Adviser, Royal Netherlands Embassy, Accra | |
| **Mrs Arundhati Inamdar-Willetts**  Team Leader for the SEA of the TIPG | |
| **Mali – *SEA of the Support Project for the Transport Sector Programme*** | **Mr. Alain Houyoux**  Programme Officer “Rural Development”  Delegation of the European Union to the Republic  of Mali | |
| **Ms Catherine Paul**  Environmental Expert for the former  European Commission Environmental Integration Advisory Services (*Ms Paul was in charge of the Malian Transport SEA quality control*) | |
| **Mr. Famoussa Bagayoko**  Head of Division Environmental and Social Assessment  Direction Nationale de l’Assainissement et du Contrôle des Pollutions et des Nuisances (DNACPN)  Ministère de l’Environnement et de l’Assainissement  Gouvernment de la République  du Mali | |
| **Guyana – *SEA of the Sea Defences Sector Policy*** | **Mr Chris Ingelbrecht**  Head of Infrastructure, Delegation of the European Union to Guyana | |

**Table 2: Other Experts Contacted**

| **Name** | **Position and organization** |
| --- | --- |
| **Simon Le Grand** | Environment & Rural Development Unit  DG Development  European Commission |
| **Michele Nori** | Sugar Focal Point  DG AIDCO E6,  European Commision |
| **Peter Brinn** | Coordinator of the former European Commission Environmental Integration Advisory Services |

# Annex 4: Example of a Risk Management Matrix

Below is a risk management matrix that can be used as a simplified starting point to manage uncertainties related to the magnitude, scale or timing of climate change and other environmental impacts.

It considers the likelihood of something adverse affecting a community (ie flooding, crop failure) and is measured in terms of likelihood and magnitude (consequences). It then gives an indication of the level and priority of impact response which should be adopted to respond to that risk.

For example, if a risk is of high magnitude (eg catastrophic) and very likely to occur then it is given the highest score (10) and if it is of low magnitude and unlikely to occur it has the lowest score (2).

Whilst it will be difficult to say for instance when and if a major drought will affect an agriculture zone during the lifetime of an agriculture policy we might say that it is possible and, based upon historical data, know that if it occurred would have a major or catastrophic impact on food security giving a score of 7 or 8 ie well worth Government and donors considering funding some kind of mitigation or preparedness.

**Remark:** Colours in the matrix indicate level of impact management/preparedness necessary to deal with the expected impacts.

* 8-9-10 (Red zone): Impact management or preparedness highly recommended.
* 6-7 (Yellow zone): Impact management or preparedness recommended.
* 5 (Beige zone): Impact management or preparedness desirable.
* 2-3-4 (Green zone): Impact management or preparedness not a priority.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  |  |  | **Magnitude of impacts** | | | | |
|  |  |  | **Insignificant** | **Minor** | **Moderate** | **Major** | **Catastrophic** |
|  |  |  | **1** | **2** | **3** | **4** | **5** |
| **Likelihood of impacts** | **Almost Certain** | **5** | **6** | **7** | **8** | **9** | **10** |
| **Likely** | **4** | **5** | **6** | **7** | **8** | **9** |
| **Possible** | **3** | **4** | **5** | **6** | **7** | **8** |
| **Unlikely** | **2** | **3** | **4** | **5** | **6** | **7** |
| **Rare** | **1** | **2** | **3** | **4** | **5** | **6** |

More information and tools on addressing uncertainties and risk management are available in the following documents:

* Australian Government. 2006. [*Climate change impacts and risks management: a guide for Business and Government*](http://www.climatechange.gov.au/en/what-you-can-do/community/~/media/publications/local-govt/risk-management.ashx). Australia: Australian Greenhouse Office, Department of the Environment and Heritage.
* OECD. 2010. *Climate Risk Screening and Assessment Tools: Making Sense of a Crowded Field.* First draft. Meeting of the OECD DAC-EPOC Joint Task Team on Climate Change and Development Co-operation, 12-13 October 2010, Amsterdam, (document no. 2, session III). Paris: OECD.

*This document has not been published yet but has been disseminated to the OECD DAC SEA Task Team.* For copy contact: Shardul Agrawala (Shardul.Agrawala@oecd.org).

* The World Bank 2006. [*Managing Climate Risk: Integrating Adaptation into World Bank Group Operations*.](http://siteresources.worldbank.org/GLOBALENVIRONMENTFACILITYGEFOPERATIONS/Resources/Publications-Presentations/GEFAdaptationAug06.pdf) Washington: Global Environment Facility Programme.

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# Annex 5: Example of an SEA Action Plan

The table below illustrates the key features recommended for inclusion in an SEA for the EC. The aim of the Action Plan is to ensure recommendations proposed in an SEA are specific and ready for implementation. It ensures that key questions relating to the implementation of recommendations are addressed – the questions of “what?”, “why?”, “when?”, “where?” “how?” and “by whom?” eg “environment M&E indicators for the road sector need to be developed by the Ministries of Transport and Environment for integration in the draft PRSP by December 2010 using budgets under the road sector monitoring programme”. Recommendations should also be prioritised (the most important or urgent recommendations should appear first).

The followings outline the main tasks to carry out to develop an implementation plan (before completing the table).

**Task 1:** Describe the issue at stake.

**Task 2:** Propose recommendation and outline the anticipated benefits.

**Task 3:** Identify the potential institutions in charge of implementation (try to be as specific as possible: identifying not only the Ministry but a person or at least department(s) in the Ministry who/that would be responsible for auctioning the recommendation).

**Task 4:** Identify actions required to implement the recommendation (eg analysis, studies).

**Task 5:** Give a clear idea of the deadline by which the recommendation, and any milestones, should be implemented and provide a rough estimate of the cost of implementing the recommendation.

**Task 6:** Identify potential sources of financing for implementation

**Task 7:** Document any evidence of support for implementation (ie which stakeholders expressed an interest to support recommendation?)

**Task 8:** Suggest indicators for monitoring and evaluation.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Recommendation 1 (Example): Cogeneration of electricity at mill** | | | | | | | |
| **Issue and description** | **Expected Benefit** | **Responsibility** | **Next Steps** | **Timing/Deadline** | **Estimated Cost & Source** | **Support for the recommendation** | **Monitoring and evaluation (indicators)** |
| Sugar mill energy production (unreliability and high cost of electricity at mill) | Renewable energy supply, reduced carbon emissions and atmospheric pollution, access to carbon finance to offset costs of installation | Sweet Tooth Sugar Mill +  The Sugar Board +  Ministry of Energy (Renewables Division)  + Ministry of Environment (CC Unit) | i) Determine Min. of Energy & Min. of Environment (as CDM focal point) support for the proposal  ii) Access to Carbon Finance Study | i) By Oct 2010  ii) By Jan 2010 | i) N/A  ii) €25,000  EC indicated funds may be available under EDF 8 contingency | Sugar Mill CEO very keen.  Ministries of Environment Energy indicated interest and EC considering funding. | Cogeneration of electricity at mill |
| **Recommendation 2:** | | | | | | | |
|  |  |  |  |  |  |  |  |
| **Recommendation 3:** | | | | | | | |
|  |  |  |  |  |  |  |  |
| **Recommendation 4:** | | | | | | | |
|  |  |  |  |  |  |  |  |
| **Recommendation 5:** | | | | | | | |
|  |  |  |  |  |  |  |  |

1. For Tanzania, only a “ final draft” report could be located and the Delegation in Dar es Salaam indicates that this was the last version produced. [↑](#footnote-ref-1)
2. We refer here to the ToRs for SEA included in the *Environmental Integration Handbook for EC Development Co-operation* (2007) which was in force when the SEAs reviewed were commissioned. [↑](#footnote-ref-2)