Advisory guidelines for a Strategic Environmental Assessment for the Ghana Poverty Reduction Strategy

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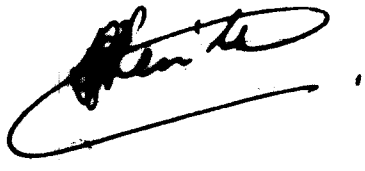
Advisory guidelines for a Strategic Environmental Assessment for the Ghana Poverty Reduction Strategy

Advice submitted to the Minister for Development Co-operation, by a working group of the Commission for Environmental Impact Assessment in the Netherlands.

the technical secretary



Ineke Steinhauer

the chairman

Klaas Jan Beek

Utrecht, 25 July 2002

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1. INTRODUCTION

1.1 The Initiative: Ghana Poverty Reduction Strategy

The Ghana Poverty Reduction Strategy (GPRS) grew from a national stakeholder forum called Ghana Vision 2020, which was intended to develop a national consensus on policies and practices for accelerating economic growth within the country. As poverty reduction was considered a high priority within Vision 2020, it formed the basis of a separate, interim strategy (Interim Poverty Reduction Strategy Paper 2000 - 2002) that was submitted to the World Bank and IMF as part of the Country Assistance Strategy negotiations. Concurrently, consultations and studies for the elaboration of the GPRS were launched. The Government of Ghana published its GPRS for the period 2002-2004 in February 2002. The GPRS will be subject to review and monitoring during this period.

Environmental degradation is referred to within the GPRS as a contributory cause of poverty. References are also made to the need for Environmental Impact Assessments (EIAs) and Audits to ensure that growth arising from the GPRS is environmentally sustainable. As a consequence, the GPRS should treat the environment as a cross cutting intersectoral issue rather than a sectoral or "add on" issue. To enable this, the environmental impacts of the policies and strategies for delivering growth and poverty reduction highlighted in the GPRS have to be assessed and considered carefully as many of the policies will have significant environmental impacts. In some instances lack of focus upon environmental management issues will affect the efficacy of the GPRS to deliver poverty reduction.

Poor environmental quality and management is, in many instances, an important factor contributing towards poverty. By recognising the poverty-environment linkage the poverty reduction goal of the GPRS could be significantly strengthened.

A Strategic Environmental Assessment (SEA) of the GPRS will be undertaken to assess the environmental risks and opportunities presented by the GPRS and identify appropriate management/mitigation measures to mainstream environmental management into socio-economic development of Ghana. This will include a cursory assessment of the institutional capacity needed to implement the identified measures.

The Environmental Protection Agency (EPA) of the Ministry of Environment and Science has requested the Governments of the Netherlands and United Kingdom to provide technical and financial assistance for the execution of the SEA.

1.2 Rationale and mandate for this advice

1.2.1 Request of the Embassy and involvement of the Commission

In April 2002, the Royal Netherlands Embassy in Ghana invited the Netherlands Commission for EIA[1] (see appendix 1 and draft ToR, appendix 2), to assist EPA in developing the framework and guidelines for an SEA of the GPRS.

In order to prepare an advisory report on this framework and guidelines, the Commission formed a working group of experts, representing the Commission, which comprises the following disciplines: ecology and agriculture; sociology and institutional development, Ghana EIA application and infrastructure and planning. The working group members of the Commission are listed in appendix 3.

This working group performed a visit to Ghana from 24-28 June 2002 (see appendix for working programme). The purpose of this visit was to:

- meet with key individuals and institutions in Ghana to understand the GPRS process, methodology and players in order to
- build up initial commitment and
- develop an SEA framework and associated guidelines for the elaboration of the SEA itself.

1.2.2 Co-operation with EPA

The approach which is usually followed by the Commission in the framework of its activities related to development co-operation, is characterised by key principles like taking the EIA-regulations of the country involved as a starting point and working closely together with the local EIA-authorities. For the SEA for the GPRS, the Commission wishes to thank EPA for its support during the Commission's visit. Particular thanks go to Jonathan Allotey and Christine Owusu Atokora. Their invaluable guidance and assistance are gratefully acknowledged.

1.3 Rationale and justification of the approach taken by the Commission

The Commission took the outline proposal for the SEA for the GPRS as drafted by EPA, the DGIS and DfID (see appendix 2) as a point of departure in defining its approach. The Commission understands that the main reason for undertaking this SEA is to integrate environmental issues into the GPRS, and thus making the socio-economic development of Ghana more sustainable. This environmental point of view is associated with the close dependency on natural resources by the poor, and therefore also has a (long-term) socio-economic validity. As a first step, the Commission consequently developed a

[1] Henceforth referred to as 'the Commission'

conceptual framework, clarifying the relations between poverty alleviation and environment. This is demonstrated in appendix 5.

SEA is understood by the Commission as 'a systematic process for evaluating the environmental consequences of proposed policy, plan or programme initiatives to ensure they are properly included and appropriately addressed at the earliest possible stage of decision making, on a par with economic and social considerations'.

The Commission assumes that socio-economic impacts of the GPRS have already been covered. The SEA will therefore focus on the biophysical or natural environment in close relationship with social and economic development goals, and integrate the findings into the overall GPRS process.

There is little experience world wide and also in Ghana of using SEA for complicated multi-sectoral plans such as the GPRS. As a result, the following framework and guidelines are largely based on other uses of SEA, logical reasoning and best professional judgement.

The Commission emphasises that this SEA does not replace the need for an EIA on the project level, but merely allows decision-makers to focus EIA on key interventions (i.e. those with major environmental impacts expected), and allows decision-makers to save time by not using EIA for every single element of the GPRS. Thus, using SEA is also recommended from an efficiency point of view. While SEA may have a more broad-brush or qualitative character, EIA is generally more quantitative (see also appendix 6).

The Commission also wants to stress that undertaking this SEA should not lead to a separate environmental strategy, as 'environment' is not a separate sector, but an inter-sectoral issue within poverty reduction.

Finally, the present report will also attribute attention to the institutional arrangements for environmental management, which will be required to ensure implementation of the SEA results.

1.4 Expected outputs of the SEA

During its stay in Ghana the Commission found that there was a great deal of variation in the level of participation, understanding, and sense of ownership of the GPRS amongst the ministries and agencies visited. Whereas some ministries and agencies have been actively involved in the entire process, other ministries were only involved in the last three months of the process and some only after the threat of a loss of funds by the National Development Planning Commission (NDPC). Moreover, during its visit the Commission noted that:

- Environmental agencies (governmental or non-governmental) have been involved, but only at a late stage and their input is not clearly reflected in the GPRS. As a consequence, environmental issues are not integrated within the various sectors but set apart in a separate section, regarded more as an 'add on' rather than an integral part of the strategy. As a re-

sult, there is the danger that environmental concerns will be lost during the implementation of sectoral strategies.

- The proposal for undertaking this SEA of the GPRS has been formulated in September 2001 by a small group, including representatives from EPA, the NDPC and an environmental NGO. The Commission notes that at this moment this proposal is not yet broadly known and shared by other stakeholders (eg. Ministries) in the GPRS. The ownership of the SEA process and results is therefore a point of concern. The position of EPA in the institutional/political setting and its formal mandate and informal clout to influence other sectors and the GPRS is a special point of attention

Taking into consideration the above mentioned observations, the Commission formulates the expected outputs of this SEA as follows:

- **Products**: (i) list of interventions of the GPRS and categorisation according to their environmental impacts, (ii) identification of environmental thresholds and environmental opportunities in relation to the proposed interventions (iii) assessment (impact matrix) of proposed interventions and submission of better alternatives for synergy between environment and poverty reduction, (iv) comparison/ranking of alternative options and guidelines for environmental management and (v) establishment of an environmental monitoring system;
- **Process**: (i) involvement of all actors, sectoral agencies in the complex field of poverty reduction and environment in order to build up mutual understanding and ownership of the results and (ii) timely availability of the results of the SEA in order to influence decision making processes within the GPRS.
- **Institutional arrangements:** assessment of the institutional capacity needed and recommendations on institutional arrangements to implement the products and guide the process.

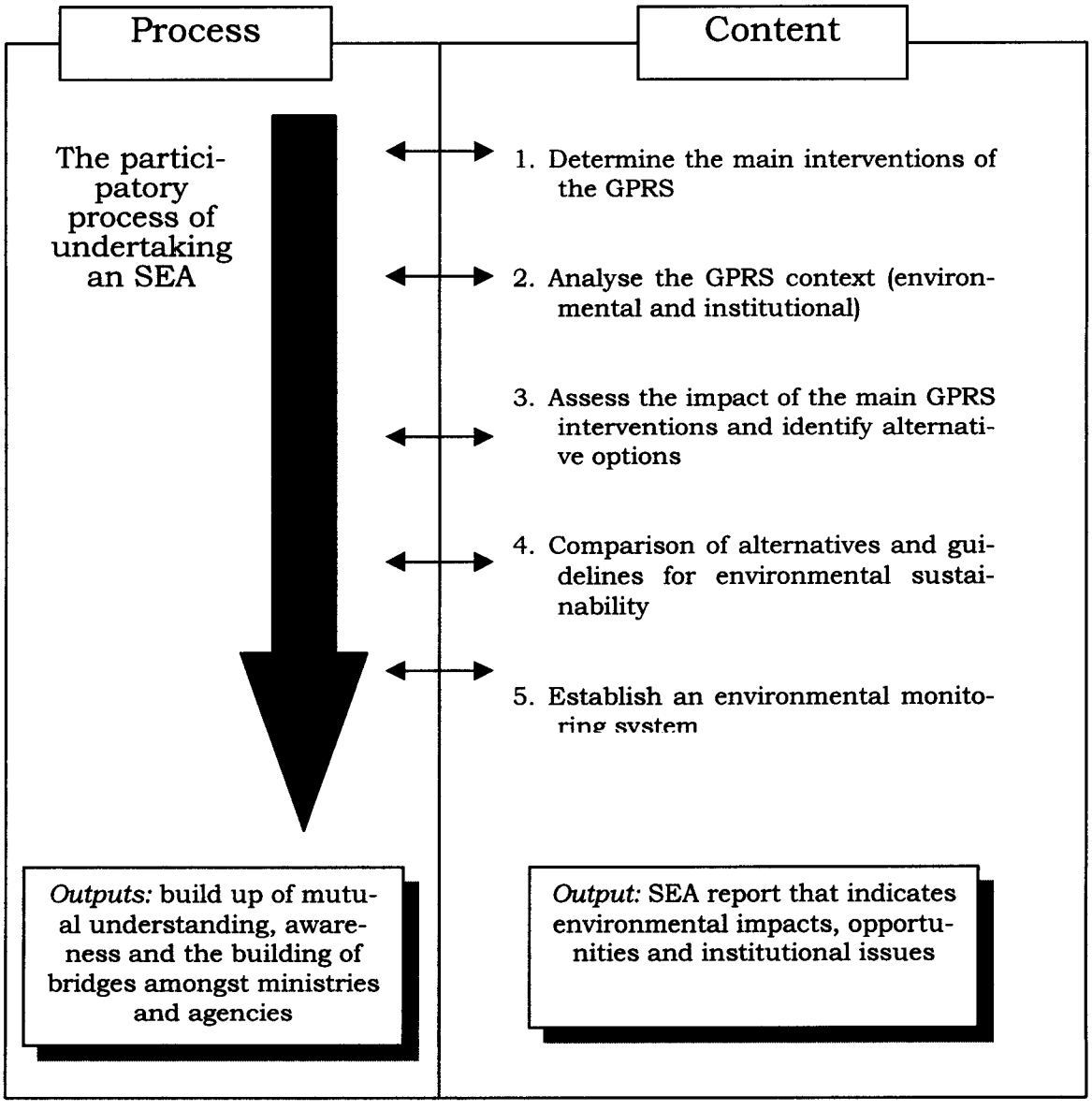
In Chapter 2 the Commission provides a framework showing in more detail how these expected outputs of the SEA interlink. Chapter 3 provides guidelines for undertaking the SEA study. Chapter 4 gives guidelines for the process of the SEA and Chapter 5 elaborates on institutional and implementation requirements.

2. FRAMEWORK FOR THE SEA OF THE GPRS

The Commission developed the following framework for the SEA of the GPRS, based upon which advisory guidelines (chapters 3 and 4) are formulated. These guidelines can serve as Terms of Reference for the consultancy firm that will assist in undertaking the SEA. The diagram below illustrates that there are two main parts to a successful SEA:

- ***Process***: SEA must be a participatory process, involving other actors and agencies working in the complex field of poverty alleviation and sustainable development. The goal or output of the participatory process is to build mutual understanding and communication bridges amongst stakeholders and increased environmental awareness.

- ***Content***: SEA is a rational and objective study to assess environmental impacts of proposed interventions. Where possible the SEA will propose better alternatives and propose institutional arrangements for effective environmental management. The content output is a report that outlines the environmental impacts, opportunities, and institutional arrangements as well as offering alternatives and guidelines.



The steps are worked out in more detail in the next chapters

3. GUIDELINES FOR THE SEA STUDY OF THE GPRS

3.1 Step 1: Determining the main interventions of the GPRS

Objectives: To determine the main interventions and targets proposed or expected within the GPRS, and which impacts will be assessed.

Outputs:

- List of main interventions proposed or expected by the GPRS, with targets and geographical areas if possible, and consistency within GPRS and with sectoral plans;
- Classification of these interventions based on expected environmental impacts with the aim to identify those interventions with important environmental implications;
- Insight in the proposed process of planning concrete interventions based upon the GPRS.

Explanation

The SEA should make a succinct overview of the main interventions that will be undertaken by the GPRS, and for which environmental impacts will be assessed. Once volume 2 of the GPRS is approved by cabinet, there will be more clarity with the work plans, budget and the longer term expenditure framework. At the moment, the proposed actions and targets are not always consistent, or certain ideas are not further worked out (for instance objectives on sustainable agriculture are not worked out and appear to be inconsistent with the proposed interventions). The SEA will have to identify where there is apparent inconsistency within the GPRS, or between the GPRS and sectoral strategic plans or policies. It will become clear that certain sectors are poorly worked out within the GPRS (e.g. water management, energy sector, forestry).

During this step the SEA will also clarify how objectives and targets within the GPRS are being (or will be) worked out into concrete actions. This refers to the planning processes within sectors and at decentralised administrative levels, leading to expected interventions. The GPRS clearly states that concrete actions will have to be planned and implemented at decentralised levels, so how will this planning take place?

At least two different types of interventions will need to be identified:

- ***Interventions at operational level***: activities directly leading to results, affecting (i) the livelihoods depending for their daily life upon environmental functions and (ii) the ecological system, providing goods and services (see conceptual framework A and B, appendix 5). This includes for instance feeder roads, agricultural intensification, education. These activities are mainly at decentralised levels.
- ***Interventions at management or policy level***: indirectly leading to results (i) enabling the operational level and (ii) affecting environmental management and other relevant policies influencing the environment (see

conceptual framework C, appendix 5). This includes for instance, enabling policies for private enterprise, macro-economic policies, land tenure, trade barriers, removing price distortions.

For the identified main interventions, mainly the operational ones, the SEA will specify, if possible, where these will be implemented, and in what sequence.

Subsequently, the SEA should categorise the proposed interventions according to their expected environmental impacts, as follows:

D: expected to have positive impacts on the environment.

C: unlikely to have adverse environmental impacts.

B: judged to have some adverse environmental impacts, but of lesser degree and/or significance than those for category A projects

A: expected to have significant adverse environmental impacts

This classification should be based on existing EIA guidelines within Ghana. The Commission recommends that where there are doubts between category B or C, the SEA should opt for B, in view of the possible cumulative effects where numerous activities occur together, as within this GPRS.

3.2 Step 2: Analysis of the GPRS context

3.2.1 Environmental context and critical factors

Objectives: To analyse the current situation with respect to the environment in relation to the poor.

Outputs:

- List of environmental opportunities (for synergy between environmental management and poverty reduction);
- List of critical environmental functions for poverty reduction (to be well managed);
- List of threshold levels or standards where available.

Explanation

The environment is beneficial for the poor in two ways: it generates goods (products with economic value), and it provides services (such as soil protection). Both contribute to productivity, security and sustainability of livelihood systems (see conceptual framework, appendix 5). The Commission notes that the GPRS now indicates only some direct material benefits (economic goods) of the environment for livelihoods of the poor, but does not mention the (short-term) security or (long-term) sustainability aspects.

Clarifying and specifying these relations for the Ghana context is of major importance. Based on this insight, environmental opportunities and critical environmental functions (with associated thresholds and standards) can then be defined, as follows. Note that this step focuses at identifying environmental opportunities and critical values (in a qualitative way). Only for environmental functions relevant for the poor quantitative threshold levels or standards will be listed.

1. ***Environmental opportunities.*** The environment offers sustainable opportunities to improve income generation and security of the poor. These are like 'win-win' options. These opportunities could offer more appropriate alternatives for poverty reduction as part of the GPRS. The SEA will generate a list of opportunities that can create synergy between environmental management and poverty reduction objectives that will be incorporated in the GPRS. Opportunities can be found at both the operational level (e.g. improved technologies) and the management and policy levels (e.g. secure land rights). Opportunities can lead to DO'S (positive list).

Example of 'win-win' opportunities: Pro-poor and environmentally friendly urban transport systems. For non-car owners, cycling can be an attractive option for urban trips. It is much cheaper (and often faster) than public transport. The urban poor spend up to 30% of their disposable income on public transport and lose income earning opportunities because time wasted getting around by foot. Therefore, cheap and efficient mobility, as provided by the bicycle, is an opportunity. However, cycling in major African cities has all but disappeared in many large cities, largely due to the lack of traffic safety. At the same time, cycling is still a significant mode of transportation in many secondary cities. Ghana is no exception. In Accra and Kumasi cycling accounts for some 5 % of all trips, but as much as 17 % in Tamale. Urban transport policies that maintain and strengthen the role of cycling in secondary cities (by providing direct and safe routes) provide win-win opportunities: they positively influence both the mobility of the poor and the urban environment.

Other possible win-win options include:

- Agricultural low external input techniques (requiring less inputs, making more use of ecological processes);
- Appropriate technology, more efficient and reducing wastes (eg. in relation to palm oil extraction);
- Better forest management for income generation, e.g. opportunities for marketing of non-timber forest products, certified timber, eco-tourism;
- Labour intensive but more environmentally friendly techniques (e.g. in relation to road construction on slopes).

2. ***Critical environmental functions and thresholds.*** There are environmental functions that are of critical significance for livelihoods of the poor. If these environmental functions deteriorate, this will have immediate influence on poor livelihoods (in terms of incomes and/or security). In principle, any decline of the quantity or quality of these critical environmental functions is undesirable in view of the direct link with livelihoods of the poor. This is

largely a qualitative approach. Critical thresholds refer to levels to be maintained to avoid irreversible loss and as a consequence severe impacts on livelihoods (in popular terms: carrying capacity levels). Environmental standards have the same function. Threshold levels and/or standards for critical environmental functions can serve to assess unacceptable impacts of the GPRS on the poor through environmental effects. However, note that threshold levels are in most cases unknown or scientifically not sound (e.g. annual allowable cut in forests not based on sound research), and standards not available or not appropriate (e.g. international standards not adjusted to the local context). The SEA will document threshold values that are known and internationally accepted (e.g. thresholds for water quality[2]), and define the missing critical thresholds needed to assure proper environmental management (e.g. thresholds for access to forests). Critical environmental functions (with associated threshold level or standards will lead to DON'TS (negative or precautionary list).

Example: Forests should be managed, and be accessible to livelihoods of the poor, in such a way that they provide a minimum of products and food security (= a threshold of forest access to the poor) and a maximum of forest diversity/quality, also for water and energy supply and security. These are critical environmental values for the poor. Thresholds might be available in terms of annual allowable cut levels for sustainable exploitation, or minimum areas of forest to provide such products.

3.2.2 Institutional context of environmental management

Objectives: To analyse the institutional situation with respect to current environmental management.

Outputs:

- Institutional arrangements with respect to environmental management (at national and local levels);
- Consequences of decentralisation for environmental management.
- Proposed changes in legal context and institutional arrangements where gaps occur or overlaps are identified.

Explanation

There are various functions to be performed for proper environmental management in Ghana. These include signing and implementing international agreements and conventions, national environmental policy and strategy formulation, coordination, implementation, enforcement, monitoring, data collection, and informing the public. Presently it is not clear who does what. The SEA should provide insight into the current situation in order to define a more desirable institutional system for environmental management, to be

[2] And other relevant standards or guidelines governing environmental quality (water, soil, air, noise, biodiversity, vegetation, solid waste) and regarding health and safety;

able to carry out the recommendations of the SEA in terms of improved environmental management and strengthening linkages with poverty alleviation.

This step involves the following aspects:

- Identification of institutions involved in environmental management (both governmental and non-governmental), leading to insight into who is responsible for environmental management functions, at national and decentralised levels;

- Understanding of strengths and weaknesses of institutions involved in environmental management (appraisal of capacities and capabilities), particularly with respect to coordination at national and decentralised levels and law enforcement, but also with respect to coordination with institutions involved in poverty reduction;

- Listing of instruments that have been applied for environmental management (command and control, market based, data information systems and engaging the public), leading to insights in instruments that can be adopted for environmental management.

3.3 Step 3: strategic impact assessment of proposed interventions and alternative options

Objectives: To assess the environmental impacts of the main proposed or expected interventions, and to propose more sustainable alternative options.

Outputs:

- Impact matrix of proposed and expected main interventions, at different levels (single interventions, sectoral aggregation, inter-sectoral aggregation and future projections);

- Alternative options for synergy between environmental management and poverty alleviation objectives;

- An indication of uncertainties and need for data collection and monitoring.

Explanation

This step is based on outputs from previous ones, by assessing the impacts of proposed and expected interventions (3.1) on critical environmental values and thresholds and consideration of existing opportunities (3.2.1), taking into consideration available responsibilities and instruments (3.2.2). The results could be presented in the form of a matrix with accompanying text (see appendix 7 by way of example).

The SEA should proceed along the following four levels of impact assessment:

1. ***Impacts of single interventions.*** Here impacts will be assessed of the main proposed and expected interventions similar to conventional EIA, but with a more qualitative than quantitative character. In addition, alternative options will be proposed as based on identified environmental

opportunities (3.2.1: win-win options). It is recommended to assess the proposed interventions and alternatives in terms of 'better' or 'worse' for the environment. The same could be done for poverty reduction. Note that the impacts of proposed interventions at management or policy level will be more difficult to assess, as they are more indirect, but they should not be neglected. In fact, potential impacts of management and policy decisions are generally greater than operational ones.

2. ***Aggregation at sectoral level.*** Secondly, as part of this step, the SEA should consider impacts of all proposed or expected interventions within one sector. This is basically an assessment of the impacts of a sectoral policy. Here, cumulative impacts might occur, and synergy between interventions at operational and policy levels. Alternative policy options for sectors can be proposed.

3. ***Aggregation at inter-sectoral level.*** Thirdly, the SEA should consider the impacts of the interaction of interventions from multiple sectors. The level of aggregation to be considered is that of a District (administrative unit), or a water basin (ecological unit). Again, cumulative impacts might occur, as well as synergy between interventions from different sectors at national and local levels. Alternative options for environmental management at these spatial levels can be proposed (see for some examples Box).

4. ***Future projections.*** Finally, if possible and feasible, the SEA will also look into the possible consequences (induced impacts) of proposed and expected interventions beyond the medium term future. A critical question is to what extent critical environmental threshold values might be reached or surpassed in the future. Whether projections can be done will depend upon the availability of data (e.g. existent for water sector). Alternatively, the need to make such projections will be identified.

Opportunities (alternative options) for inter-sectoral reinforcement of environmental management and poverty reduction objectives.

- Environmental education to support reforestation activities by / within schools (GPRS, section 7);
- Establishing youth employment for treatment of solid wastes (section 7);
- Special programmes for victims of natural catastrophes like drought or floods (section 8);
- Installing environmental governance at local level (section 9).

The Commission notes that Section 7.7 of the GPRS (safe water and environmental sanitation) is a good example of such synergy, although it could be further linked to wetland management.

More specifically, the impact matrix will give an overview of the interventions with most (expected) environmental impacts, and proposed alternative options where relevant. The impact matrix will be adjusted to provide for the four levels of impact assessment as proposed.

This step will also provide a list of uncertain impacts, and highlight the need for additional data collection and monitoring.

3.4 Step 4: Comparison of alternative options and guidelines for environmental management

Objectives: To determine more sustainable alternative development options and guidelines for environmental management contributing to poverty reduction.

Outputs:

- Conclusions based on environmental impact matrix;
- A ranking of alternative options, according to both environmental and poverty reduction objectives;
- Proposed institutional arrangements with respect to environmental management (at national and local levels), with possible consequences for decentralisation processes.
- Guidelines for environmental mainstreaming at operational level, thus facilitating EIA.

Explanation

Based on the impact assessment at four different levels, and the overview of relevant alternative options, the following policy conclusions should now be derived:

- A ranking of alternative options with strong environment – poor linkages; in most cases these options will be more cost-effective and therefore important for the GPRS. Alternative options should be defined at all four levels: single interventions, sectoral policies, integrated policies and future oriented projections. Alternative policy options refer to strategic policy choices, such as the choice for subsistence and/or export-oriented agricultural development, low or high-external input agriculture, etc..
- A list of proposed or expected interventions that should be subject to more detailed EIA, as they contribute to poverty alleviation, but are expected to have negative environmental impacts. Detailed EIA will lead to compensating or mitigating measures through additional environmental programs in case of negative environmental impacts.
- A list of uncertain impacts, in view of lack of data.
- A warning for certain proposed or expected interventions as they have severe impacts on critical environmental functions and thresholds (not good for environment, not good for poverty alleviation now and/or in future);
- Guidelines to integrate environmental issues into planning processes in line with the GPRS. Guidelines will refer to ways to manage critical environmental factors and thresholds that are important for the poor. Where

possible, standard will be defined and performance targets will be set for implementation of these guidelines (e.g. forest area to be well managed). This can at a later stage lead to legalising these standards.

Subsequently, the SEA will show the linkage with the institutional arrangements for environmental management, to implement and follow-up the results of this SEA. This will focus on:

- Recommendations for institutional arrangements for improved environmental management, at national and local levels, and requirements for support to gradually improve the existing situation along these lines. These recommendations will address all environmental management functions as indicated above (3.2.2).
- Recommendations with respect to procedures to integrate environmental issues into detailed planning, using the guidelines developed by this SEA.
- Recommendations with respect to institutional arrangements to implement the proposed environmental monitoring (see next step).

3.5 Step 5: Establishment of an environmental monitoring system

Objectives: To define a selective set of environmental indicators and the main elements of an environmental monitoring system.

Outputs:

- Set of priority environmental indicators based on critical environmental values;
- Main environmental monitoring responsibilities at different levels.

Explanation

Environmental monitoring is commonly not considered a priority. EPA has now proposed a set of environmental indicators to be monitored, but this list is too long and monitoring responsibilities have not been defined. Based on the identification of critical environmental threshold values and opportunities, the SEA will propose a limited set of indicators, and propose monitoring responsibilities that have been agreed upon by other agencies.

Environmental indicators will be defined at three levels: state, pressure and response indicators and limited to the most essential.

Monitoring these environmental indicators will be integrated with existing systems of monitoring socio-economic development indicators. Establishment of an integrated monitoring system can be based upon experiences with monitoring and evaluation in pilot Districts.

An integrated monitoring system will focus on generating data to be able to respond to questions with respect to:

- Whether expected negative environmental impacts are properly mitigated or compensated;
- Whether the critical environmental factors are well managed;
- Whether environmental opportunities are realised concurrent with poverty reduction.

The SEA has to assess to which extent monitoring responsibilities can be delegated to decentralised levels, and be a joint activity of the different sectors involved. Defining clear tasks and responsibilities for monitoring, and for analysis of the results and feed-back to policy review, is critical for effective monitoring.

4. GUIDELINES FOR THE SEA PROCESS

The framework in Chapter 2 shows how the SEA study and the SEA process are intricately related. In a general sense, the Commission notes that the SEA of the GPRS should be seen as an opportunity to establish a dialogue amongst sectoral agencies, as a starting point to mainstream environment in development plans and development planning processes.

The undertaking of this SEA is the first step of a longer process of dialogue and collaboration between the Ministry of Environment and Science and other Ministries, the private sector and NGOs. This process will certainly continue beyond the time period of undertaking the SEA. This can be considered as a learning process for all institutions involved in environmental management.

The principles of SEA (see also appendix 6) can be used as guidelines:

- transparency/open communication
- participation by all relevant players
- publication
- feed-back to the public

This objective will be achieved through a process of debate, consultations, and discussion among EPA and other Ministries, private sector and environmental NGOs, both at national and local (District) level. This should help raise awareness on the need to integrate environmental issues at 'management' and at 'policy' levels, particularly as part of local development and decentralised planning and decision-making.

The SEA process will first of all focus on the institutions that constitute potential alliances with EPA, such as Lands and Forestry, the Water Resources Commission, health, environmental NGOs. Subsequently, the other Ministries will be involved. A number of Districts will be visited on a pilot basis, to asses their current and potential future role in environmental management. The selection of these Districts should be representative (rural – urban, well – poorly equipped, large – small population, north – south of Ghana, etc.).

The following Box can be considered as a checklist to structure the SEA process of debate with other institutions, and shows the linkages with the SEA study as elaborated in Chapter 3.

Agenda for structuring interaction with other institutions / organisations.

- What are critical environmental values to be respected in view of poverty alleviation and security of the poor? How will these values be affected by the GPRS? What future projections can be made? Are there any guidelines, standards or threshold values with respect to desirable management of these critical environmental values?
- What are opportunities for linking environmental sustainability with poverty alleviation? What are concrete successes and 'best practices' for establishing such linkages? Or what are reasons that these opportunities are not realised?
- What are opportunities at management or policy levels? What are potential linkages with other sectors or other institutions, to strengthen environment – poverty linkages? What are constraints to establish such linkages?
- How is the current situation of environmental management being perceived? What are ideas for improvement (desirable situation)? Who should play a coordinating role? Who should ensure law enforcement, monitoring, policy formulation, and other environmental management functions? What are concrete examples of good collaboration between agencies in terms of environmental management?
- What concrete measures and/or support is required to move towards a more desirable situation of environmental management, both at national and at District levels?
- Determine the five top priority indicators that should be monitored to measure progress in environment – poverty alleviation linkages? What are concrete norms or targets with respect to these indicators?
- What are existing useful data sets? Who manages them and how can these data sets be updated and made accessible and affordable for environmental management and other purposes?

5. INSTITUTIONAL ARRANGEMENTS AND IMPLEMENTATION MODALITIES

5.1 Observations on institutional arrangements

Currently, the GPRS does not have strong environmental advocates either within the Government or outside (such as vocal NGOs). The most obvious advocates would be the Ministry of Environment and Science (MES) and the EPA; however, neither the Ministry nor the EPA are considered strong enough to adequately defend/champion the country's environmental interests. This could be attributed to several factors. One of the most crucial is the challenge

of the Ministry and the EPA in co-ordinating environmental concerns and responsibilities that stretch across a number of ministries. Linked closely with the challenge above, it can be difficult for a ministry to effectively handle cross-ministerial conflict resolution, especially with regard to resource allocation.

For example, the Ministry of Health (MoH) is responsible for the eradication of guinea worm in the country. The most effective way to do this is through the provision of potable drinking water to affected communities, however the mandate for safe water provision is in the Ministry of Works and Housing (MoWH). If the MoWH does not fulfil its commitment to the provision of water in guinea worm endemic communities, the MoH, the MES, and the EPA find it difficult to force the MoWH to comply even with its own commitments.

At the national level, the SEA could significantly contribute to the strengthening of the co-ordination and advocacy of environmental concerns by working closely with an inter-ministerial co-ordinating committee, with the secretariat based in the MES and technically supported by the EPA. This committee could serve not only as a forum for sharing information and co-ordinating environmental activities, but as a mechanism for resolving inter-ministerial conflicts. Conflicts that cannot be resolved at this level would be forwarded to the NDPC for mediation.

Moving from the national level, it is recognised that a decentralised governance system offers a number of opportunities for residents to monitor and act on environmental concerns more quickly by devolving certain environmental responsibilities to lower levels of government. Even though many responsibilities have been decentralised to the district level, it is recognised that the corresponding fiscal and administrative authority has not been devolved. It is important to note that this represents a threat to the effectiveness of district assemblies and technical staff to be able to respond to and advocate for specific environmental issues within their constituency. In order to accelerate the stalled decentralisation process, a presidential oversight committee could be established. This committee would have supra-ministerial authority to work out conflicts and overlaps between ministries and agencies.

5.2 Practical suggestions for implementation

The SEA study and process will be commissioned by NDPC and co-ordinated by the Ministry of Environment-EPA. The Commission recommends the following requirements to the consultants undertaking the SEA:

- international expertise in SEA of policies, experience of SEA work in an African context and understanding of both environmental management and institutional context;

- proven ability to lead a highly inclusive assessment process, bringing together relevant stakeholders and getting commitment for the process and results of this SEA.

- experience in institutional strengthening of the environmental sector, needed for optimal environmental management of the GPRS.

- it is recommended to provide a training to EPA staff and other relevant stakeholders on issues of (managing the) SEA, as an immediate follow-up of this advisory report.

Concerning the timeframe, the Commission understands that the GPRS is a 'living document' which will be updated and adapted regularly. Therefore, the Commission recommends to have the SEA ready when mayor decisions on adaptation of the GPRS are about to be taken. NDPC therefore has a prominent role in indicating when results are needed (probably early 2003), in order to ensure a timely availability of information to be used in decision-making on the interventions (and budget-allocations) within GPRS. The Commission estimates that the elaboration of the SEA will take a minimum of three months.

Assuming the results of the SEA are available by the beginning of next year, the Commission's working group can come together again to perform an independent review of the quality of the process and content of the SEA.