



Netherlands Commission for
Environmental Assessment

Project proposal for introduction of SEA for planning

Memorandum by the NCEA

7 December 2005



Advice of the Secretariat

To The National Planning Commission of Pakistan (NPC)

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Date 7 December 2005

Subject Project proposal for introduction of SEA for planning
By: Secretariat of the Netherlands Commission for EIA
Advice 2005-014

1. INTRODUCTION

In January 2004 IUCN Pakistan submitted to the Netherlands Embassy in Islamabad a first draft of a concept paper for a project proposal on introduction of SEA in Pakistan. The Embassy asked NCEIA to comment on the proposal. NCEIA submitted its observations on the proposal on January 29th. Subsequently, IUCN drafted a full proposal (October 2004) and, as NCEIA was assumed to be a partner in the project, submitted the proposal to NCEIA for comments. October 29th 2004, NCEIA submitted advice on the proposal, its main observations being that the project seemed to be mainly on advocacy, that there seemed to be no ownership with local government while the proposed pilot was on a sensitive plan as the PRSP.

In may 2005 IUCN drafted a new version of the proposal, that, according to the NCEIA, insufficiently addressed the doubts of the NCEIA with regard to government ownership.

NCEIA then proposed to field a mission and discuss the proposal on introduction of SEA in planning processes with the government agencies concerned (National Planning Commission and the Ministry of Environment) and with IUCN, in order to assess the ownership for the proposal and suggest making it a joint proposal of the Planning Commission, the Ministry of Environment and IUCN. For a programme of the visit consult annex 1.

As the earthquake in Kashmir intervened shortly after the mission and as it was assumed that emergency relief work would consume time and workforce of all concerned for a considerable time, NCEIA suspended the submission of the present advice.

2. OBJECTIVE OF THE ADVICE

This advice reflects the opinion of NCEIA as presented at the restitution meeting with IUCN at the last day of the mission. It may be used for reformulation of the proposal on introduction of SEA in Pakistan.

3. FINDINGS OF THE MISSION

The mission has come to the following findings:

1. Introduction of SEA for planning purposes is included in the Medium Term Development Framework 2005 – 2010 as adopted by the Government of Pakistan.
2. Although the proposal on introduction of SEA in Pakistan¹ was presented as an IUCN proposal, it has been the Environmental Section of the Planning Commission that has formulated the proposal with the help of IUCN Pakistan. At the level of the environmental section of the National Planning Commission there is full ownership of the proposal.
3. Within the Planning Commission, the status of the environmental section has its limitations. The section has a broad mandate but is said to lack the appropriate budgets to fulfil that mandate. Donor agencies have stepped in. E.g. under the PEP, an IUCN-hired consultant is assisting the Environmental Section of the National Planning Commission in its endeavours. However, it is understood that the section still has insufficient resources to fulfil its mandate.
4. The ministry of environment has neither been included in the proposal on introduction of SEA nor in its preparation. At the moment of the mission, the Environmental Section of the Planning Commission doubted whether the Ministry of Environment should be invited to participate as partner in the proposed project to introduce SEA.
5. The ministry of Environment made it clear to the mission that it finds time not ripe for introduction of SEA in Pakistan. It emphasises that it would like to focus on improvement of the EIA system and asks the NCEIA to assist in that endeavour.
6. The EPAs have the legal mandate and the competence to administer Environmental Assessments. It is to be considered the appropriate body to provide technical guidance to SEA processes.

¹ Forging Ahead - Advocacy and Capacity for the inclusion of Strategic Environmental Assessment in Pakistan's Planning Process.

4. RECOMMENDATIONS

The NCEIA recommends:

1. To get the Ministry of Environment (including the EPA) on board as technical partner in the project;
2. to reformulate the proposal:
 - a. as a proposal of the National Planning Commission, the Ministry of Environment and IUCN;
 - b. including in the project proposal the development of institutional capacity in the Planning Commission and the Ministry of Environment (EPAs);
 - c. including in the proposal a logical framework that provides clear targets and verifiable performance indicators for every specific year of project activity;
 - d. making next years' project funding depend on satisfactory project performance in the current year (and foresee ending the project if no progress is made);
 - e. include at least 4 real-live SEA pilot cases, to be done from the second project year onwards. The pilots are suggested to concern:
 - i. a national policy
 - ii. a national development plan for a sector (e.g. energy)
 - iii. a provincial policy
 - iv. a provincial development plan

5. NCEIA'S COMMITMENT

NCEIA is committed to assist the National Planning Commission and its partners in the project by providing free of charge expertise for training, for coaching of project implementation and for quality assurance of the SEA pilots.