



Netherlands Commission for
Environmental Assessment

Comments on a Joint Review Document, determinating indicators for SEA for Sector Plans Mozambique

Memorandum by the NCEA

21 March 2008



Advice of the Secretariat

To Ms Celia Jordão, DGIS

Attn Mr Jean-Christophe Arret, Worldbank
From Mr Reinoud Post (The Netherlands Commission for Environmental Assessment)

Date 21 March 2008

Subject **Comments on a Joint Review Document, determinating indicators for SEA for Sector Plans Mozambique**

By: Secretariat of the Netherlands Commission for Environmental Assessment – Reinoud Post

Advice 2008-02

- 1. INTRODUCTION**
- 2. ADVICE, COMMENTS ON THE JOINT REVIEW**
- 3. ?FIRST CONTINUED EFFECT (?OPTIONAL?)?**

1.

Introduction

By email dated 18 March 2008, Ms Celia Jordão requested Mr Reinoud Post, from the Netherlands Commission for Environmental Assessment to comment on the Joint Review 2008, prepared by MICOA as a basis (working document) for further discussion to formulate SEA plans for key economic sectors in Mozambique together with the involved authorities and donor agencies.

Objective of the “Joint Review” is to achieve sustainable development in the country through integrated intersectoral (i.e. central, provincial and local) approaches and/or initiate SEAs for sector plans.

Analysing earlier actions carried out within the framework of the implementation of environmental strategy for the sustainable development of Mozambique learned that there are still persisting practical problems left.

There's need of a change of paradigm of sectoral development, so that the intersectoral coordination in the area of environment can be more effective than it is now, leading to a common vision and treatment of environmental matters, contributing to sustainable development and poverty reduction.

Reviewing the Joint Review 2008, the Commission acknowledges the importance and finds it an excellent idea to make the strategic planning of four key economic sectors in Mozambique more sustainable, environmentally and socially. However, in giving realisation to this idea, the review already poses some issues that need to be addressed in further preparation of formulating the indicators for SEAs:

2. Advice, comments on the Joint Review

2.1 SEA for sector plans

The review work concerning the Joint Review 2008 dated March 18th, resulted in the following issues that need to be sorted out, addressed, anticipating different scenarios.

- a) Whose idea is it? Does it come from the sector ministry itself, does it come from MICOA or does it come from donor agencies?
- i) The most ideal situation would be the sector ministry itself that wants to do this. Then, one can be sure that the intentions behind the idea are pure and that there will probably be commitment to the SEA-process and to effectively translating its results into the sector plan.
 - ii) If the idea comes from MICOA, there must be a check on MICOA's motives (sometimes, environmental ministries propose SEA in the intention to get grip on, and power over sector ministries. This, however, is the best recipe to create resistance and, hence, failures). Moreover, MICOA must be informed that the idea of doing SEAs for sector policies may be felt as offensive by the sector ministries. As there is (as far as I know) no legal requirement for SEA, a tactful and cautious approach from the side of MICOA is necessary to succeed.
 - iii) If the idea stems from donor agencies, an equally well contemplated strategy must be developed to get sector ministries so far that they want SEAs for their sector policies. The art is to make them think they themselves invented the idea. OR: The art is to convince them into dedicated ownership of the idea.

Public demand (by civil society groups for instance), negative publicity and conflict with other sectors can boost the preparedness of sector ministries for doing SEA for sector plans.

- b) Who pays for the SEA?
- i) The most ideal situation would be that the sector ministry itself raises the funds for doing the SEA. This gives proof of commitment and keeps the sector ministry proudly in the drivers' seat.
 - ii) If the SEA is to be done with donor money, it would be most ideal that the sector ministry is given the authority to administer the funds. In all cases the sector ministry must be the proud 'owner' of the SEA process. In all cases it is of the utmost importance that the sector ministry takes up the ownership of the SEA process.
 - iii) If the money comes from the private sector (which is the least desirable, as planning is a government task and the private sector partner will always want 'something' in return), it should be unconditionally put at the disposal of the sector ministry, preferably through an impartial party (possibly through the ministry of finance).
 - iv) According to the Secretariat it is not to be preferred [It has not my preference] that MICOA provides the funds for SEAs for plans of non-MICOA sectors. Managing the money may bring MICOA to wanting to use it to buy influence.
- c) Who is in command?
- i) It has already been said that, according to [us] the Commission, the command (also financial) should be with the sector ministry.

- ii) MICOA would have the role of coaching the sector ministry on process management and contents of the SEA (technical advisor). MICOA would have to develop full skills to provide such services.

As a consequence of the above, the Commission [I] would suggest the following approach for 2008-2009

- 1) Draw lessons from the experience so far. This means:
 - a) MICOA could, indeed, do an expert review of the quality of the PROAGRI II (sector) and de Govuro (sector development on district level) SEAs
 - b) Discuss the results of the SEAs themselves and of the expert review with the sector ministries involved and find out whether the instrument SEA would in principle be of any use to their sector planning.
 - c) Discuss with the sector ministries involved possible future collaboration on SEA for their planning.

This approach would lead to the following indicator:

Area	Indicator	Meta 2008	Meta 2009
Ambiente integrada	Cumulative N° of sector ministries that use SEA for sector plans	1	3

SEA for district planning

- 2) [I think it]The secretariat finds it [is] an equally good idea to make district planning more environmentally and socially sustainable. In my view a number of issues must be realised before one can formulate an indicator that has a fair chance to be realistic:
 - a) [I assume] The Secretariat assumes that the objective is planning for sustainable development. If the plans must be sustainable they must be 'integrated plans' (i.e. economic, social and environmental), they must include the spatial component and the planning process must be participatory in nature (in order to get the necessary public support). SEA could be a useful approach for this.
 - b) It is known that there is already a lot of experience with sustainable planning on district level (a.o. at the CDS of Xai Xai, PFPF, PPF [Nampula, Cabo Delgado]). Evaluating and capitalising on this experience should in [my] the Commissions view form the basis for further work. Therefore, an inventory of experiences must make clear whether (and if so, which) promising (SEA and Spatial Planning inclusive) methods of integrated planning are already at hand.
 - c) In its facts and figures document on Mozambique (internet), and in addition to concluding that at district level the planning infrastructure and planning capacity is weak or non-existent, UNCDF points at a series of constraints and challenges as to the legal and policy base for decentralisation and its financial base. In planning for capacity

development for district integrated planning, these constraints and challenges need to be known and analysed. The identified weaknesses should be brought in (at the appropriate level) in discussions with government.

- d) Many institutions and agencies seem to have a stake in planning. An inventory should clarify their stake and authority. This inventory would be the basis for developing agreement on their collaboration/division of tasks.
- e) If no promising (SEA and Spatial Planning inclusive) methods of integrated planning are at hand, the first objective should in the Commissions [my] view be to develop, based on the experience mentioned under b) an SEA-inclusive method for integrated district planning that can be done with non-sophisticated means.
- f) In addition to the development of the method, the funding base for planning would have to be studied. Structural funding for planning exercises should be available and earmarked through the regular district budgets.
- g) The next objective should then be to develop and test-run a newly designed method in a limited number of districts with those partners that are involved in assisting district authorities in planning. This test-running could be at the same time a 'training on the job' exercise.
- h) After successful test-running, the use of the method could then be extended to a greater number of interested districts.
- i) This approach would lead to the following indicator:

Area	Indicator	Meta 2008	Meta 2009
Ambiente integrada	Nº cumulativo de PEDDs (com componente especial) formulado com AAE	3 coastal districts	7 additional districts (coastal and others)

- j) If a suitable method for (SEA and Spatial Planning inclusive) integrated district planning is already available, the indicator could be:

Area	Indicator	Meta 2008	Meta 2009
Ambiente integrada	Nº cumulativo de PEDDs (com componente especial) formulado com AAE	33	40

3. ?FIRST CONTINUED EFFECT (?OPTIONAL?)?

Following the Commissions' advice above an additional proposal for the formulation of the indicator in the Joint Review was made by DGIS and the Worldbank (in Portuguese), which stated that this Joint Review is a major initiative of MICOA to add to the strengthening of intersectoral coordination and to deepen the process of integration of the environmental agenda in the sectoral plans and programs through instruments like Strategic Environmental Assessments (SEA). In this joint review it is proposed to include a new strategic indicator concerning SEAs, to be discussed and agreed with the sectors. In 2008, the proposal is to implement an SEA with the sector of Agriculture - program of forests, and three SEAs with the sector of Energy - in three coastal districts with the potential for exploitation of oil and gas. In 2009, it is proposed to held an SEA with the sector of Energy - program of biofuels.

If the new indicator is discussed and approved upon it is ready for reviewing, probably in September 2008.