



CASE

# SEA

*as a suitable  
platform*

for a debate on sustainability

Since 2014, large reserves of fossil fuel were found off the coast of Senegal. The discovery caused the expected stir, both nationally and internationally. Strategic environmental assessment offered good opportunities to bring together the interests of different national and international actors.

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### **National conference**

In 2018, a national conference on offshore natural gas resources was organised by the Ministry of Environment. The conference focussed on several questions relating to sustainable development. Will this work for or against the people of Senegal? Will thousands of artisanal fishermen benefit or suffer from offshore activities? Is there a potential threat to biodiversity? How will the state use the revenues? What could be the impact on the country's energy system? In his closing speech, Prime Minister Mahammed Dionne called for a Strategic Environmental Assessment (SEA) to address such issues. This was also in response to a call in Senegal, that anything related to oil and gas development should be transparent to prevent that a privileged few might benefit disproportionately from this new national source of income.

### **Governmental guidelines for offshore oil and gas development**

In 2023, the SEA report was published. In one of its public consultations, the government had denounced the topics on which it would soon adopt sectoral guidelines. These topics included the management of hazardous waste, management of polluted drilling water and drill cuttings, environmental monitoring, reduction of greenhouse gas emissions, and future public stakeholder participation. To integrate various policy areas, such as energy, fisheries, environment biodiversity, and marine protection, an interministerial group was established in 2021 to conduct the SEA. This enabled the government to provide a comprehensive and coherent set of guidelines, feasible for implementation by relevant authorities and the private sector. The interministerial group was seen as a major step forward. The Ministry of Energy chaired the group, making it a stronger counterpart of the international oil industries, better prepared to guide the investments. On the other hand, a

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remaining point of attention was preparing public guidance for long-term private investment strategies, particularly those onshore.

### Steps towards the governmental guidelines

Over the five years between 2018 and 2023, various government bodies discussed the development of the offshore sector and the required government guidance. This involved organising many consultations among invited NGOs, oil companies, and local governments, both at the national level and in the most affected regions. Widely announced public hearings were facilitated. In 2021, a procedure for SEA was agreed upon and formalised in an interministerial decision, making the consultations 'official'. In 2022 and 2023, progress accelerated as a consultancy firm was hired to structure the discussion. With the SEA officially announced and set for publication, this was not without obligation: stakeholders had high expectations.

As often happens in such cases, the SEA might have been simply a unilateral effort by the mandated department of the Minister of Environment. The dialogue between the ministry, the oil companies and the NGOs might have been focussed only on the rather narrow scope of environmental impacts. Other significant impacts and possible measures that need to be taken into consideration when designing a sustainable policy for the oil and gas sector, might have been overlooked. The Minister of Environment had chosen to collaborate with the Minister of

Energy, to obtain more administrative power in this sector, and to invite other ministries with responsibilities related to this issue. It had become an innovative procedure and a process of joint fact-finding.

### Drivers of success

Such strategic collaboration between several ministries engaging in an early dialogue with the private sector and NGOs about the development of a sector, was not common in Senegal. Several vital moments can be identified that led to this innovative approach. The Prime

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Minister's statement at the national conference ('we will conduct an SEA') was the first crucial moment. Through a

compelling narrative, SEA was positioned as a key instrument for the responsible development of the oil and gas sector. It paved the way for generating broad support, based on dialogue and sound analysis contributing to joint fact-finding on a national scale.

It was not without risk to the Prime Minister to advocate for a transparent procedure for strategic decision-making without having a budget ready to finance a sound SEA. Transparency also poses a risk for the administration, which could face an overwhelming number of responses.

The decision to establish an interministerial working group, was made possible by top administrators in the Ministry of Environment and the Ministry of Energy, who had the courage to propose this new arrangement to their ministers. These administrators again had been inspired by informal leader networks that were active between 2018 and 2021 – and that continued to inspire the implementation of the formal SEA. These leader networks consisted of senior administrators





from the same ministries, as well as some civil society organisations and other ministries. Together, they developed a narrative that convinced the top administrators and ultimately their ministers to embark on this adventure. The ‘narrative’ sessions were facilitated by top administrators, many of whom had attended the conference in 2018. They gave their people a safe space to develop cross-ministerial ideas. Prejudices such as ‘The Ministry of Energy is simply interested in the rapid development of natural gas’ and ‘The Ministry of Environment typically wants to slow down the process’ were thus given less chance.

The group of ministries commissioned their representatives to develop a groundbreaking Terms of Reference for the consultants’ research to prepare an SEA report. The selected consultancy firm had not planned to write legal guidelines, thus the group of ministries ensured that these were written in another way, to complement the SEA. They saw to it that the consulting firm came up with recommendations that were useful and applicable to Senegal. In other words, the administrative leaders enforced a high level of ambition, while looking at feasibility and ownership.



**Mr Papa Samba Ba, Hydrocarbons Director at the Senegalese Ministry of Energy**

“A main takeaway from the whole process is that we need to strengthen ad hoc inter-ministerial cooperation, in this sector and elsewhere.”

**Mr Baba Drame, Director of the Environment and Classified Establishments**

“It makes me proud that the Senegalese government, from the outset, has been determined to integrate the environmental and social dimension into oil and gas development.”



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**International actors**

While the ministries played a leading role, other actors also facilitated this way of working. It was a series of events that built upon each other. For example, prior to 2018, the president of Senegal had appointed a top civil servant at the

level of ministers to coordinate governance in this sector (the ‘COS Pétrogaz’). This civil servant and his office had been instrumental in the national conference in 2018. The World Bank supported the Senegalese energy transition and provided

the financial support necessary to hire an SEA consultant.

All these smaller decisions and interactions of actors who were not necessarily in contact with each other, contributed to a joint window of opportunity to assist Senegal in making responsible choices for its offshore oil & gas development.

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**Takeaways**

- Leadership from Senegalese authorities at all hierarchical levels proved crucial to the success of the SEA trajectory.
- Complex strategic issues require ad hoc collaboration among authorities. Strategic Environmental Assessment has helped structure such an interministerial collaboration.
- Sustainability issues can be sensitive and require an investment in social and political capital (trust). Beyond being a technical study, SEA can provide a platform for building trust through the facilitation of constructive dialogues.
- Responsible authorities, holding full ownership of the planning and decisions, may need assistance in enhancing the quality of process. Combining a sector-related tendering procedure by World Bank with an independent free of charge process expert from the NCEA, worked well.
- The NCEA's availability and flexibility as a government-to-government arrangement without having any deadlines of its own, allowed for tracking the unpredictable dynamics in Senegal. Investing in aftercare and reflection may fall outside the scope of donors. Yet, process support in this phase can be of great value in maintaining and further developing the trust and integration mindset that emerged during an SEA process.

