



Netherlands Commission for
Environmental Assessment

Reformulation of Ghana Environmental Assessment Support Project

Memorandum by the NCEA

12 May 2005



Aide-Memoire

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CC : Mr. Jonathan Allotey, Environmental Protection Agency

1. INTRODUCTION

The Royal Netherlands Embassy (RNE) in Ghana invited the Netherlands Commission for EIA (NCEIA) to provide assistance to the Ghanaian government agencies; Environmental Protection Agency (EPA), National Development Planning Commission (NDPC) and Town and Country Planning Department (TCPD), in their combined effort to re-formulate the existing proposal for the Ghana Environmental Assessment Project capacity building/institutional strengthening project (GEASP). ToR for this assistance are provided in Annex 1.

The expected results of the assistance of the NCEIA can be summarized as a proposed outline for the reformulation of the draft proposal and guidelines for how to proceed. Based upon this advice, EPA, NDPC and TCPD will then elaborate a revised draft project proposal, which will be assessed again by the NCEIA prior to final appraisal by the RNE.

This Aide-Memoire reflects the work done during three days working sessions with the counterpart organizations.

2. WORKING METHODOLOGY

The NCEIA started its visit with a briefing session at the RNE, followed by a briefing session at EPA. The NCEIA is well informed on the work undertaken in the SEA phases I and II, but less on the results achieved by GEACAP phase I. Therefore, it was decided to have an explanation by EPA on the project proposal for GEACAP phase II, as this document was not provided to the NCEIA. With this information, the NCEIA elaborated a first proposal for a new outline. This outline was discussed subsequently with the counterpart organisations in a working session. Also for one of the specific objectives, by way of example, a joint effort has been undertaken on how to formulate

justification, target groups and indicators. The adaptation of the proposed outline led to some additional questions for the RNE, for instance in relation to the time schedule, the budget and the way forward in terms of appraisal. The main result of this meeting was that it would be advisable to reduce the project period to about 18 months, in order to improve chances for a relative quick appraisal. This is necessary because some of the activities need to start immediately in relation to the planning cycles of the Ghanaian Government. The last day working session with the counterparts was therefore dedicated to set priorities in the objectives and activities.

3. GENERAL OBSERVATIONS

A basic framework has been agreed upon for writing a multi-annual GEASP program that has as the main objective 'Environmental Assessment (EA) used as an instrument to help achieve sustainable growth, development and poverty reduction'. The basic framework is based on a general log-frame model. It includes agreed upon specific objectives and expected results. With the GEASP team it has been clarified what are the next steps to work out a full-fledged proposal, including identification of main activities, definition of indicators for monitoring progress (outputs, effects and impacts) and required capacities to implement the project (see Annex 2). In addition a number of indicators have been developed and are being proposed for an effective monitoring system (Annex 3), and a few guidelines have been proposed that can be helpful in finalising the proposal (Annex 4).

It has been decided to initially limit the time span of the proposed GEASP to a period of 18 months and priorities have been set accordingly (see Annex 2). A limited time span is justified as follows:

- Limiting the time span will increase the probability of the project being approved and financed by the RNE at short notice;
- Building in a preliminary period of 18 months is in line with the preliminary recommendations resulting from the organisational scan;
- Limiting the time span and scope does not compromise upon the overall objective of the larger GEASP but will allow to make some adjustments on the basis of new experiences and emerging insights.

It has been agreed that EPA with its partners will finalise the new proposal next week, latest Monday 23 May, and will receive comments by the NCEIA latest 26 May so that the new proposal can be submitted to the RNE soon.

It has been proposed that the GEASP team collaborates with SNV on the subject of undertaking SEA District level pilots, starting in July 2005, as this is also a priority for SNV and SNV has capacities available in this field.

The NCEIA has confidence that the GEASP proposal as discussed and agreed upon is relevant, feasible and will be effective.

4. CONCERNS AND RECOMMENDATIONS

During the mission a number of constraints and difficulties were encountered, some of which the NCEIA would like to raise as these constitute serious concerns for successful implementation of the GEASP.

- The first proposal was submitted early November 2004, a response from the RNE was obtained early February 2005. There are concerns that approval of the new proposal will take long, so that (amongst others) a window of opportunity to influence the new District level planning cycle will be lost. RNE is recommended to speed up the approval process so that latest by August at least activities at District level can commence.
- An organisational scan has been undertaken of EPA by SNV consultants with the aim of proposing measures to improve EPA organisation-wide. Based on the results that were made accessible to the NCEIA and some discussion with EPA, it seems that there has been a lack of transparency on the process and the results and an apparent lack of objectivity on some of the issues raised. It is recommended that these flaws are corrected as soon as possible.
- It seems that the RNE has committed itself to support EPA on its SEA activities, and this is known among other donors such as Danida. Unfortunately, due to lack of an approved GEASP, EPA now has insufficient resources available to be actively involved in sectoral SEA's such as undertaken in the water sector financed by Danida. Such involvement is essential for quality control, guidance, facilitation and drawing lessons. This would be another argument for speeding up the approval process.

Annex 2: Basic structure of GEASP proposal

Log-frame model used

	<i>Description</i>	<i>Indicators</i>	<i>Assumptions / risks</i>
Final objective / goal		Impact indicators	
Specific objectives	1. 2. ...	Effect indicators	
Expected results	1.1 1.2 2.1	Output indicators	
Main activities (QQTP)	1.1.1 1.1.2	X	X

Overall objective / Goal of GEASP:

'Environmental Assessment (EA) used as an instrument to help achieve sustainable growth, development and poverty reduction'.

Specific objectives (in red are indicated subjects to be taken up after 18 months; main activities indicated are not exhaustive)

Each specific objective to be developed in terms of:

- Justification (link with problem analysis)
- Target groups
- Expected results (1.1. etc.)
- Main activities / interventions (1.1.1 etc.)
- Indicators (at level of objective and expected results)

1. To establish an effective and sustainable EA system within Government institutions at different levels (horizontal and vertical integration)

Target groups: PPMED, RPCU, DPCU, EPA, TPCD, NDPC, mobile units, statutory planning committees, ...

- 1.1. Institutional analysis carried out of current EA system (functions and mechanisms at different levels for effective implementation of EIA and SEA)
- 1.2. Different models for EA system proposed as based on institutional analysis and in decentralisation perspective
- 1.3. Different models for EA system tested in a few pilots, supported, analysed and evaluated
 - 1.3.1. One pilot to be undertaken (one region and one District within)

1.4. Successful EA models disseminated

2. To build capacities / skills among EA practitioners within the EA system

Target groups: EPA staff, planners (includes NDPC, TCPD), consultants, trainers / lecturers, legal officers, both existing and newcomers... (distinguish inner and outer circle)

- 2.1. Analysis of capacity building needs among EA practitioners updated (resources, supportive tools, materials, training)
- 2.2. Training programmes established on specific subjects for different target groups, including proposed training institutions (EPA, Universities, consultants, IAIA,)
 - 2.2.1. Most urgent ones: EPA staff, TCPD, NDCP, some consultants based on analysis
- 2.3. EA training at different levels / target groups undertaken, including supply of training materials
 - 2.3.1. Most urgent ones: EPA staff, TCPD, NDCP training on SEA
 - 2.3.2. Training of consultants on SEA for sectors
- 2.4. EA practitioners involved in EA pilots for learning-on-the-job
- 2.5. Communication network and facilities established for exchange of experiences and learning
- 2.6. Training system internalised and institutionalised

3. To test and further develop EA tools and skills within the Ghanaian context

- 3.1. District pilots undertaken during SEA II analysed to generate lessons as precursor to new pilots
- 3.2. New District pilots undertaken (SEA) to expand scope of current District SEA experiences to natural resources forests, land and water
 - 3.2.1. Two / three pilots (north, middle, south), possibly in collaboration with SNV for new planning cycle
- 3.3. Sectoral pilots undertaken (SEA)
 - 3.3.1. Advocacy for support to an SEA of national capital District
 - 3.3.2. Involvement of EPA, TCPD, NDPC in ongoing sectoral pilot/s (water/Danida, mining/EU, others?)
 - 3.3.3. Documentation of lessons from pilot/s for input to supportive tools and training
 - 3.3.4. Undertake pilot on agricultural sub-sector
- 3.4. GPRS updates or reviews undertaken (SEA), including links with MDGs, NEPAD and other frameworks
 - 3.4.1. Ongoing update to be documented for input to supportive tools and training
 - 3.4.2. Future reviews not yet certain
- 3.5. EA methods or tools tested through pilots (EA, EIA, SEA) – e.g. health impact assessment, social assessment, integrated assessment, based upon felt needs –
- 3.6. EA procedures / guidelines developed for financial institutions and insurance companies
- 3.7. Regional conferences to share experiences and disseminate lessons (also to announce new GEASP)
 - 3.7.1. Regional conferences at onset of new project, and at end of project

4. To develop and improve legal conditions and supportive tools to facilitate effective EA implementation

4.1. Requirements / gaps for legal reform identified and proposals made (for EA and for spatial planning), based on and linked to proposed and tested EA system models

4.1.1. Consultancy on EA gaps or requirements for reform

4.1.2. Consultancy on TCDP review of CAP 84 and proposal of new planning standard

4.2. Amendments for required legal reform drafted

4.3. Relevant environmental legislation collated and distributed to Districts

4.4. EIA sectoral guidelines established (8)

4.5. Supportive tools established / improved for EA (SEA, EIA) at national, sectoral and District levels (manuals, handbooks, guidelines,)

4.5.1. Planning guidelines for District SEA

4.5.2. Planning guidelines for Sectoral SEA

4.5.3. Guidelines on SEA GPRS

4.6. Supportive guidelines institutionalised where appropriate

Management issues

1. Staffing: 20% of time for 5 persons for running of PIU
2. Supportive services:
3. Investments / logistics
4. Operational costs
5. Monitoring and evaluation
6. Knowledge management
7. External communication
 - High level sensitisation seminar on the GEASP, at onset and at end
 - Publicity associated with pilots, seminars, etc.
8. International travel / courses
9. Short term consultancies:
 - Law enforcement, investigations and prosecutions
10. Evaluation / mid-term and final

Annex 3: Examples of justification and indicators.

Examples of Justification

For addition to the general objective

GEASP is based upon experiences within two earlier projects, being GeaCap and SEA. Both projects have not received follow-up support although this had been explicitly foreseen. An earlier version of GeaCap II proposal (from 2002) has been fully integrated in this new proposal.

The Ghana Government and EPA in particular attribute high importance to development and application of SEA as an instrument for mainstreaming environment into policies, plans and programmes. This has been demonstrated by the fact that SEA features in the 5-year plan of EPA and a budget allocation has made in the national budget.

For addition to the specific objective 1

According to the mandate of EPA, EPA are co-managers of the environment. Thus, EPA is expected to share its responsibilities in assuring effective environmental assessment. Placing certain EA responsibilities with MDA's and other institutions will also be helpful in developing a more pro-active approach of implementing EA. Placing certain EA responsibilities at regional and local level is in line with ongoing decentralisation processes. These are all arguments for developing an EA system with shared responsibilities (horizontal and vertical integration) which will ultimately increase effectiveness and efficiency of undertaking EA.

Examples of Indicators

At the level of final objective

- Number of poverty, economic growth and environment relations mentioned in new GPRS, and other (sectoral, regional, District) planning documents subjected to SEA
- Budget allocated to pro-poor / pro-environment policies / activities
- Perceptions of poor social groups on benefits of EA (EIA, SEA) applications (in Districts or regions)
- Economic, social and environmental indicators in Districts or regions where EA tools (EIA, SEA) have been successfully applied

At the level of objective 1

- Number of EIA's in which officers from different levels have been actively involved (shared responsibilities)
- Number of District plans with environment issues well integrated

- Number of MDA's applying the SEA guidelines on their own
- Number of institutions that have assigned staff with EA responsibilities and a budget for operations

At the level of expected results

1.1 Clarity about all roles and responsibilities at different levels (vertical and horizontal)

1.2 Roles and responsibilities defined for at least two worked out models for EA system

1.3 Performance of at least 2 models for EA system tested and documented

1.4 Number of MDA's or regions successfully applying tested EA models

At the level of objective 2

- Number of EA practitioners with adequate skills to perform their EA tasks
- Number of national and international requests for training on EA tools
- Quality of EA applications (EIA, SEA), as judged by stakeholders involved
- Number of EA practitioners actively involved in sharing EA experiences and lessons

At the level of objective 3

- Number of EA tools tested and ready for widespread application in Ghana
- Diversity of EA tools having been tested in Ghana
- Number of EA practitioners actively involved in pilots (learning-on-the-job)
- Number of replications from pilots having been tested
- Number of international references to EA experiences in Ghana

At the level of objective 4

- Number of necessary legal reforms being implemented
- Number of EA practitioners making use of developed EA supportive tools
- Number of supportive tools having been developed and actively used

Annex 4: Guidelines

The GEASP team is suggested to use and apply the following principles when finalising the GEASP proposal:

- Include a description of the roles, mandates and responsibilities within the EA process of the different organisations involved (EPA, TCPD, NDPC and others), including a justification of the added value of working in partnership
- Include a brief vision that illustrates and highlights the final expected outcomes of the GEASP
- Include a section on strategy which highlights how the 4 specific objectives reinforce each other and create synergy
- Include a justification of why pilots are being undertaken and how, through sharing of experiences and learning, these will lead to guidelines for widespread application. Pilots also offer good potentials for on-the-job-training by different stakeholders.
- Refer to other sources of funding or projects where relevant (e.g. CIDA, UNDP work in 5 districts), thus ensuring complementarity and avoiding duplication
- Include a justification of the required and proposed budget items on staff and logistics.
- Elaborate on the capacities required to perform the proposed project activities and demonstrate that the project is feasible in terms of available human capacities, or specify external resources that are required.
- Make sure main activities are defined as much as possible with specifications in terms of QQTP (quantity, quality, time and place).
- Follow as much as possible the format (Guidelines document) provided by the RNE to facilitate swifter appraisal
- Ensure sufficient attention to overall project management.