



Netherlands Commission for
Environmental Assessment

Advice on Draft Inception Report Zambezi Multi-Sector Agenda/ SEA/PEOTT

Memorandum by the NCEA

MOZAMBIOUE



27 May 2014



Advice of the Secretariat

To Zambezi Valley Agency, UATA

Attn Mr Gido Mulhovo, Mr Roberto Mito, Ms Helena Ribeiro

From The Netherlands Commission for Environmental Assessment, NCEA

Date 27 May 2014

Subject **Advice on Draft Inception Report Zambezi Multi-Sector Agenda/SEA/PEOTT**

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

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1. Introduction

In the framework of the Terms of Reference for the Netherlands Commission for Environmental Assessment (NCEA) concerning involvement in the Zambezi SEA/MultisectorAgenda/PEOTT/Digital Model (signed March 2014) the NCEA received a request from the UATA (the technical and administrative support unit of ZVDA and MICOA). UATA requested NCEA's opinion, comments and recommendations on the Inception Report (Relatorio Inicial) sent by the TPF consortium on May 19. The NCEA was asked to send its comments to UATA before May 30.

In the next chapters, the NCEA gives its preliminary findings. These are the joint observations on the document by the NCEA technical secretaries Reinoud Post and Ineke Steinhauer. The NCEA has used 'O Parecer sobre o documento draft informal do Relatório Inicial' of May 8 as a review framework. This 'Parecer' includes the joint observations by UATA and NCEA on an informal draft version of the Relatorio Inicial sent on April 18 for comments. NCEA has checked whether the requirements in the 'Parecer' have now been addressed in the final version of the Relatório Inicial (except for the issues under item 16, which were mostly UATA's observations). The main observations are presented in Chapter 2 according to page numbers in the Inception report (Relatório Inicial).

2. Observations by the NCEA

p.11 The Report gives a summary of the issues raised in the Parecer da ADVZ of May 8, but does not indicate in which chapters/paragraphs these issues will be addressed.

In the Parecer, an observation has been made regarding the fact that the Introduction was not sufficiently clear for the reader regarding e.g. the objectives of the project etc. It appears as if

this observation has not been taken into account. The introduction is still a bit sloppy (e.g. there are two sets Annex 3 and 4?)

Moreover, the introduction does not elaborate on which adaptations have been made and why, and where these adaptations can be found.

p.17 Cuadro 2, regarding the tasks of UATA, it is now stated that UATA will facilitate the public participation process together with TPF. It is however now clear what this ‘facilitation’ exactly implies, e.g. the sub-item logística is still mentioned, whereas the Parecer asked to clarify this issue.

P. 18 Cuadro 3 is a revised list of key stakeholders. It is however not clear why certain Ministries of Central Government have been skipped from the list (e.g. MPD, Menergia, MIC etc). It is stated that the list will be up-dated continuously during the process. Cuadro 4 however (p. 20-21) has not been updated.

P. 23 List of experts is now deleted from the Relatorio and it is stated that a proposal regarding this issue will follow in a separate letter. Point 3 of the Parecer, regarding the ‘Lista de equipe técnica’ therefore still remains unaddressed.

P. 26 ‘A informacao disponibilizada e obtida pelo consorcio TPF é indenficada en Anexo (? No number?, Annex 1 is assumed)

P. 30 Regarding Annex 1 (12 p. altogether): An explanation is given regarding what kind of information has been gathered so far. The explanation is not very clear, e.g. there are no ‘bold’ texts, it is not clear what is meant with F, INC, NID etc. In addition it would be helpful to include the explanation also in the Annex itself (not only in the text).

A more important observation however is that there seems to appear an imbalance in collecting more and more information (too much) and contacting/involving stakeholders in Mozambique (too limited, see also item 5 in Parecer, regarding ‘Configuracao Institucional e Key Stakeholders’ about the importance of support by the sector stakeholders). Collection of information must be tailored to what is needed for the PEOTT, MSP, SEA and Digital Model. Now the process of information collection just seems to continue without keeping in mind that all this information has to be checked by the key stakeholders.

Also, the function of the lists given on **p. 31-34** is still not clear. How does this relate e.g. to the information mentioned in Annex 1? What is the purpose of listing all these bullets?

P. 34-41 The text regarding the Digital Model remains unchanged, although the Parecer requested to provide more information (item 6, ‘Modelo Digital’).

P. 48 Par. 6.3 refers to an figura anexa (without number) Esquema de Articulacao Metodológica. The figure (and all arrows) however is difficult to understand without explanation.

P. 48 Par. 6.4.1. SEA methodology: The first two paragraphs elaborate on the goals of SEA and the products. The goals are said to be: 1) establishment of quadro estratégico territorial: 2) orientation for private sector investment projects and conservation initiatives 3) program of capacity development of socio-economic and environmental management and monitoring,

4) assessment of strategic impacts of different development initiatives in the region and 5) an orientation for territorial planning or the most important governmental sectors in Moz. It seems as if the SEA objectives are somewhat haphazard and not linked to the MSP and PE-OTT. When mention is made of investment 'projects' and when the assessment of scenarios is not mentioned at all, the impression arises that the link of the SEA with the MSP and PEOTT is still not very well made.

p. 50 Par. 6.4.3 on Sustainability Indicators. As has been asked in the Parecer (item 8. Indicadores de sustentabilidade e desenvolvimento de visao estratégica), more attention has now been paid in the Relatorio Inicial on this issue. However, this is mostly textbook only, referring to the CSD. Par. b) on p. 51 has the title 'Adaption... to Mozambican and Zambezi Valley reality, but only mentions that this will be done. Also par. c) on p. 52-54 remains an enumeration of CSD example indicators, which have not been tailored to Zambezi Valley. The link between the sustainability indicators and the strategic vision (to be developed under the PEOTT) has not been further elaborated (as was requested in the Parecer, item 8).

P. 54 6.4.4 District Environmental Profiles. Item 9 do Parecer (Perfis ambientais distritais) requested to better explain 1) how the information feeds the AAE/PM/PEOTT, 2) the scale of the profiles and 3) the table of contents of the district profiles. This has indeed been addressed now in the Relatorio.

P. 58 6.4.5 Development of Scenarios: The observations made regarding this issue in the Parecer (item 10, 'Desenvolvimento de cenários') have all been addressed and better explained, including in figure 9, methodological zoom. However, no link at all to 6.5.6 (see later)

P. 61 A new paragraph has been included on a strategy on Gender issues (as has been requested in the Parecer under item 16). However, the information provided here is again very much textbook, and moreover making use of very 'European oriented' sources which are rather old (almost 15 years). It is remarkable that no reference at all is made to any Mozambican policy/information on gender issues. In addition, no attempt has been made to explain an approach specifically for the Zambezi Valley. There is a wealth of up-to-date material that can be used here (see enclosed material recently developed by NCEA also, key sheet and QRG)

P. 63 Par. 6.5.2 Diagnóstico Ambiental. New text has been added here. Regarding 6.5.2.1 Enquadramento legislativo/normativo: In general, providing a long list (and description) of policies, strategies, national programs, international conventions, national laws etc. is not useful if no insight is given in, or conclusions are drawn on what the legislative framework implies for the Zambezi Valley. Or in other words, a translation should be made into what kind of restrictions or guiding principles the legislative framework poses on e.g. the development of a strategic vision, of the different scenarios to be developed.

P. 67 Análise dos factores ambientais, 6.5.2.2, new text added, but it remains unclear how the list of factores ambientais relates to the contents of the District Environmental profiles, as they are partly overlapping. Moreover it is not clear how the information will be used in the other components (Digital Model? SEA? PEOTT?)

P. 68–69 6.5.3. Diagnóstico Social e Económico, par. 6.5.3.1. See observation above (P 63). New text has been added, but attention should be paid to move from providing a list of documents relevant for the legal and political context to a interpretation of the implications of the legal and political framework for the Zambezi Valley.

P. 69–71 6.5.3.2 Análise dos factores sociais e económicos. Again new text is added here: but again not clear how the list with bullets of information to be analysed relates to the information gathered in the District Environmental profiles and the information that will be gathered in the PEOTT (p. 98–99).

p. 71–72 6.5.3.2.2 Abordagem geral de caracterizacao e diagnóstico económico and 6.5.3.2.3 Abordagem geral da caracterizacao e diagnóstico social..... Very difficult to understand what TPF proposes to do here. They e.g. speak about a Proposta de Modelo Territorial e de Governancia (which is not one of the Models which was asked for in the ToR of the Digital Model??). The text in 6.5.3.2.3 is mainly textbook and has an highly academic character (e.g. references to certain geógrafos). It seems as if these activities are being proposed in 'splendid isolation'. There is no information on what is being proposed for the Zambezi Valley concretely.

p. 74 6.5.4 Análise custo–beneficio e avaliacao económica dos servicios dos ecosistemas. New text has been added as from 6.5.4.2 onwards: Resumo da Abordagem Metodológica. The activity is said to lead to (P.75) an identification of land use conflicts and a valuation of ecosystem services which will be integrated in the assessment of the reference situation under the SEA, the strategic diagnosis under the PM and the territorial characterization and diagnosis under the PEOTT. In a later stage, the scenarios developed as part of the PM and SEA will be assessed for their economic impacts.... and will put certain conditions for the PEOTT. This seems a useful application of the tool. However, under the AAE, PM and PEOTT description, nowhere any reference is made to the use of the ecosystem services valuation. Some minor remarks: text is still in English (p. 76) and on p. 77 some dates are mentioned for workshops to be held in October. Not clear whether feasible, because there is considerable delay. Moreover, throughout the rest of the document, no concrete dates are mentioned at all for the Forums.

p. 78 6.5.6 Estudo dos Cenários Sectorais. New text has been added here, but this is somewhat different from the text on p. 58. 6.4.5 on Scenario development as part of the AAE???? P. 79 starts with mentioning that specific alternative scenarios per sector will be developed, and the steps 1 to 7 that follow again propose a new methodology, not making any reference for example to the use of the digital model and/or ecosystem services valuation etc.

p. 79–80 Sectores fundamentais, 6.5.6.2. New text, but copy–paste from NCEA advice. One would have expected that by now contacts would have been established already with the different sector stakeholders to ensure adequate commitment by the sector in the process of scenario development.

P. 81–90 6.5.8 Identificacao de sinergias e conflitos etc. New text, but almost 100% copy–paste form NCEA advice. The only sentence that has been added is at the end of p. 90, stating that 'the NCEA analysis will be adopted and further detailed'....This could have been done more

easily, just referring to these parts of the NCEA advice. It is rather disappointing that no further steps have been made yet.

p. 92 6.5.10 Finalizacao.... Again new text and copy-paste NCEA advice. The last sentence of this paragraph refers to formacao e transferencia de conhecimentos in very general terms. Perhaps a reference could be made to chapter 6.9 which is now further detailed regarding this issue.

P. 93 6.6.1 Enquadramento legal do PEOTT. Some information has been added, meeting the requirements in the Parecer, item 11 PEOTT. It is difficult to judge for NCEA if this is now sufficiently clear in terms of information on the process or procedure for PEOTT formulation, this is for UATA to assess.

P. 96 Text two times (“Esta... Marromeu”)

P. 98–99 Elementos sectorais. Text has not been adapted and therefore has not taken into consideration the recommendation in the Parecer item 11 PEOTT, regarding inclusion on land rights (DUAT) and mapping of ecosystem services.

P. 99–101 Definicao de Visao Estrategica: new text added, which better explains how the strategic vision will be developed.

P. 110–115 Accoes de Capacitacao e Accoes de formacao. 6.9. This has now been further elaborated, thus meeting the requirements in o Parecer item 12, Processo de Participacao Pública. Also in the figure, the public/stakeholder participation events have now been more clearly separated from the capacity building and formation events.

As it is envisaged that the first capacity building activity will take place as part of the first mission/Forum 1, it would be helpful to already develop a more concrete program for this activity for approval by UATA (i.e. who will prepare, organise and give the training, who will be the participants (names, institutions), logistics etc.

Detail: p. 113 a) identification of necessidades de ‘formacao’ in stead of ‘capacitacao’

P. 115–119 Plano de comunicacao, 6.10. Text has not been changed, except for clarification on the issue who decides on the web-site contents and what information is put on it, including access rights (as was asked for in o Parecer, item 13. Plano de comunicacao). No further effort has been made to elaborate a more concrete communication plan for at least the first Forum (as was asked for in the Parecer, item 13).

P. 130–134 Tables of contents, chapter 8. The Indices for each of the four components that the requirements asked for in Parecer, item 14 and 15 have not been taken into consideration. Moreover, the indices do not reflect some of the items in the previous chapters (such as the gender strategy). What is even more of concern is that the tables of contents clearly demonstrate that each of the 4 processes is still executed in isolation from each other (e.g. 8.3.4 Analise dos aspectos ambientais and 8.4.2 Analyse dos factores ambientais).

3. Concluding remarks

NCEA has concern about the quality of this Relatorio Inicial. A lot of text has been added, creating an imbalance between each of the four components (e.g. around 15 p. on digital modal, 15 on AAE, 30 on MSP and 10 on PEOTT). But just adding text does not really make the quality better. It seems as if what TPF tried to 'repair' or add, creates even greater confusion and makes it much more complex.

NCEA is of the opinion that this material is not suitable, nor easily accessible, for presentation at the Inception workshop. It is very difficult to understanding/grasp the proposed methodologies and moreover the link between each of the processes.

The lack of integration of the different processes is clearly demonstrated in Chapter 8 of the Relatório, with the tables of contents of each of the 4 processes, which appear to be prepared by each of the 4 teams in isolation. The most important products as expected of the whole exercise, namely the MSP and the PEOTT are not even mentioned.

NCEA's impression is that the TPF consortium general coordinator should play a much stronger role, being responsible for good coordination and integration of the 4 processes (AAE, PM, PEOTT and the use of the MD in all this), but also managing the capacity building/formation processes and the stakeholder dialogue with the institutional parties in Mozambique. Not only (environmental) knowledge is needed, but also communication and dialogue abilities and connections to/network with sector planners/decision makers in Zambeze.

As expressed by NCEA previously, it is crucial for the TPF team having physical presence in Mozambique during the whole process. TPF now proposes to arrange all activities in 5 missions around the Forums, which is not a feasible option for a good quality process.

NCEA suggests to ask TPF to prepare a much more accessible (short) version of the Relatorio Inicial deleting all the 'textbook' like parts and focusing more on a product that can be presented at the Inception workshop and understood by important stakeholders.