

# **Strategic Environmental Assessments: Framing the complexity of the environmental commons for multi-institutional stakeholders<sup>1</sup>**

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## **ABSTRACT**

The process of Strategic Environmental Assessment (SEA) involves drawing on a wide range of ecological and socio-political factors to influence the decision making process for policies, plans and programs. Unlike the environmental impact assessment, which deals with very tangible impacts and concrete actions, the SEA is broader and more encompassing, both institutionally and ecologically. As a result of this, the issue of environmental management spans a wide array of ecological issues and a broad range of impacted and effected institutional stakeholders at multiple levels. Within the process of the SEA, the involvement of stakeholders requires asking them for an investment of their time and energy to provide critical insights into the forthcoming policy, plan or program. This paper will address how the complexity of the environmental commons can be framed in a manner that provides incentives for stakeholder involvement in the SEA, while also improving outcomes to enhance complex multiple resource use strategies. This paper draws on applied experiences with SEA multiple developing countries for the US Government, World Bank, and European Union.

**Key Words:** Strategic Environmental Assessment, Stakeholders, Strategic Planning, Donor driven initiatives, Sustainable Development, Developing political institutions, Environmental Assessment methodology

## **Introduction**

The applied practice of the Strategic Environmental Assessment (SEA) provides opportunities for practitioners of environmental management to consider environmental concerns within the wider policy, planning and program levels.

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The relatively new use of the SEA provides an opportunity for those who are impacted, as well as those involved in the planning process to consider the environmental concerns of these wider policies, plans and programs. The strategic nature enables adjustments to be made which avoid unnecessary damage to environmental conditions, and to incorporate options that can improve conditions in the future. The challenge of this approach in developing political systems is that it is often donor driven, requires inputs from multiple sectors governmental institutions and can encounter trepidation from those unfamiliar with this method. Further the wide ranging approach of the SEA can also require inclusion of institutions who consider themselves to be peripheral, or potentially hampered in their activities by environmental mandates. Due to the complexity of the environmental impacts, combined with the vast number of stakeholders and institutions involved, this approach is ripe for critical analysis through the lens of collective action and identifying incentives for common property management. The purpose of this paper is to provide a summary of challenges facing practitioners of donor driven SEAs in developing countries, and to offer some potential solutions to these challenges as a first stage in better understanding how to most optimally apply this critical planning tool.

The applied use of the Strategic Environmental Assessment (SEA) has become required for a substantial number of large-scale investments in new donor driven activities. The World Bank, European Union, and US State Department Millennium Challenge Corporation are among those in the international donor community who rely on this approach to improve the environmental soundness of the decision making process at the local, national and regional levels. The use of the Strategic Environmental Assessment provides two venues of protection. First, assurances that the prospective, policy plan or program under consideration meets with internationally approved environmental standards required of the donor community provide protection for the donors. Second, the implementation of the SEA provides increased protection for the environment by taking a multi-sectoral approach to environmental stewardship by increasing support and buy-in from actors within a diverse array of institutions within the affected area. The third benefit is an increase in coordination between stakeholders and institutions with regards to a common area of concern that can then stem to wider intersectoral institutional cooperation.

The good intentions of the donors can create challenges for practitioners of SEAs, as there is often resistance in developing countries to what is perceived as the prying nature of the SEA analysis, and requirement of an investment in time and budget resources without due compensation. These challenges can hamper the effective use of the SEA, which was a method designed for use in developed political systems with strong bureaucratic functions and a general acceptance of inter agency coordination. The complexity of the environmental commons, and the SEA as an institutional cross sector commons with benefits to all participants and the environment can be successfully employed if the approach is framed correctly. This paper outlines the challenges that face SEA Consultants, and

offers some potential solutions through the lens of SEA as a common property resource.

### *Strategic Environmental Assessments – A tool for planning*

The Strategic Environmental Assessment approach emerged as a planning tool that incorporates environmental concerns in the broader planning strategies for policies, plans or programs. The intention is that environmental considerations should be on par with other developmental priorities, including economic and social issues. The SEA takes a broad approach to environmental concerns working to mitigate negative impacts of development while increasing positive effects within the anticipated decision-making processes. The intention is to increase the sustainable development by meaningfully incorporating SEA into the planning processes as an environmentally conscious, inclusive decision-making tool.

This method of assessment emerged in the 1990's in developed countries eager to address their environmental needs for development in tandem with economic development needs. As a result the SEA methodology is broadly constructed for use in political institutions with high levels of stakeholder involvement and significant opportunities for impacted parties to provide inputs into the decision making process. The impetus for the creation of the SEA was the 1969 US National Environmental Policy Act, and the emergent environmental policies in Western Europe. The European Commission adopted the SEA Directive 2001/42 (European Commission 2001) The UNECE also adopted an SEA Protocol in 2003. The main thrust of SEAs stem from institutional developments within the US and the EU. The approach focuses primarily on meeting the needs for stakeholder inclusion and environmental considerations in planning systems with capacity to enforce environmental legislation and the acceptance of public input into the decision making process.

### *SEAs and EIAs*

Since the initial development of the SEA approach, they have emerged to address the planning processes (policy/plan and program level) above the project level where Environmental Impact Assessments (EIAs) are much more commonly employed. SEAs share the same evolutionary roots as EIAs, and are more familiar and commonly employed throughout the US, Western Europe and beyond. EIAs are much more specific, attempting to determine what the environmental ramifications will be of a specific project to be implemented. Examples of projects that require EIAs can range from development or expansion of specific infrastructure, industrial, residential estates, commercial, or agricultural projects. The key difference is that an EIA is employed when there is a predetermined implementation of a specific project already under consideration.

The EIA assesses the baseline environmental conditions, and the likely impacts of the project implementation. It then provides a concise set of recommended mitigation efforts to be undertaken to avoid negative environmental impacts of a specific project, and establishes measurement criteria to be used for monitoring and evaluation. Depending on the specific location and legislation, as well as funder for a project, there are standard points where stakeholders are informed of the findings of the EIA, and given opportunities to comment on these. The comments are generally incorporated into the final EIA report.

With the SEA, the same basic steps are followed as with the EIA, but with more emphasis on identifying environmental indicators (rather to a firmly established empirical baseline) and testing the sustainability of the strategic action objectives and alternatives, rather than specific mitigation recommendations of the EIA for projects already at the pre-implementation phase. Thus, the SEA is more fluid and dynamic, but also allows for more points and types of input from a wide array of impacted and involved stakeholders in the planning process.

### *SEA in Practice*

The scale of the SEA can vary – at the most superficial level, it can focus only on preliminary environmental concerns incorporating social and economic issues only as they relate to the environment. At the medium level SEA can go in depth into environmental issues, with ties to the social and economic concerns tied to environmental stewardship. The most involved SEAs delve into the complex depths of inter-related social, environmental and economic concerns through a broad sustainable development lens. The depths are reflected in the resources and time allotted to the SEA.

EU Best Practices (Therivel 2004) for the implementation of an SEA include the following approaches:

1. ***“Visioning” – Develop a vision for a sustainable future***
2. ***Identify the environmental/sustainability indicators***
3. ***Describe the environmental baseline***
4. ***Identify problem areas***
5. Analyze links with other strategic actions
6. ***“Scope” the SEA – agree on assessment methods, environmental criteria, alternatives to consider, level of detail, etc. of the SEA***
7. ***“Screening” - Identify statements that most/don’t need assessment***
8. ***Identify more sustainable alternatives and compare alternatives***
9. Test the sustainability of the strategic action and alternatives
10. Ensure that the elements of the strategic actions are compatible with each other
11. Document SEA findings
12. ***Consult with stakeholders, public, regarding SEA recommendations***
13. ***Support decision making processes***

#### **14. Audit the SEA findings through ongoing monitoring and evaluation**

In the SEA process, which is adhered to under EUs Directive guidelines – there are multiple access points for stakeholders to have inputs into the decision making process. The stages in **bold italics** in the list represent where veto players have access to the assessment and decision making processes. (*Ibid* and (Tsebelis 2002) These stakeholders may be formal institutional actors such as officials from other Ministries or they may be “public” stakeholders who through civil society status are able to shape the debate through public pressures. (Unless otherwise noted, in this section “stakeholders” refers to official governmental officials and members of the broader public. This will be delineated in the subsequent discussion.)

The intention of the stakeholder involvement is to assure that a wide array of concerns, priorities and interests are met in the long range planning processes. By asking for stakeholder input in the visioning, indicator, baseline, and problem area stages – the process seeks to be broadly inclusive and incorporate multiple perspectives into the development of strategy. Further, by gaining stakeholder input early on, in the identification of problems and baseline stage there is an increased investment in the outcome of the full SEA, and therefore a higher degree of stakeholder buy-in.

Within the scoping, screening, and alternatives identification stages, this enhanced stakeholder buy-in can be used to increase the reach of the SEA. This allows those responsible for producing the SEA to tap into the creative potential of those who will be directly affected by this process. These invested stakeholders often have unique perspectives to the issues, and may understand the influential factors in a way that an external consultant or planning official cannot. If the process function according to best practices, the external consultant or planner takes a role to help guide the decision making process of the SEA, but the ownership and ideas belong to the stakeholders.

The external consultant(s) or planner is charged with examining the implications of the SEA alternatives and ensuring they are compatible with other elements of the SEA, and other broad range planning priorities. Again these are followed by three final stages, including a formal public consultation process (in line with standard practices of an EIA), support to the decision making process, and ongoing monitoring and evaluation of the SEA in which stakeholders, both public and official have opportunities for significant inputs into the decision making process. Additionally, depending on how the auditing is set up, and the specific legislative parameters of the case in question, the stakeholder may be responsible for the monitoring and evaluation activities, especially if stakeholder ownership is especially high.

The initial involvement of stakeholders, the solicited buy-in, and the opportunities both formally and post assessment to make active and creative inputs, creates a

highly democratic, often consensus based decision making process, which elevates the importance of the environmental stewardship to the same level as social and economic development. This is an ideal vision of SEA.

### *Complexity of issues in SEAs*

The SEA process is tasked with examining a comprehensive range of environmental issues. When the program, plan or policy in question will potentially impact any of these, attention must be drawn to them. If the impacts are negative, mitigation recommendations are required. If the effects are positive, these should be enhanced where possible. This requires the SEA consultant be well versed in these issues and is able to draw upon relevant stakeholders to provide support and information within the scope of their involvement.

A standard SEA should examine environmental conditions pertaining to (*inter alia*):

- CO<sub>2</sub> and other greenhouse gas emissions;
- waste levels and re cycling implications;
- Water usage and aquifer depletion;
- Air quality implications;
- Energy demand;
- Mineral and agricultural resource base implications;
- Marine resources;
- Flora and fauna/biodiversity;
- Noise and air Pollution levels;
- Regulatory implications

The focus of the SEA can be very specific on environmental issues, or wider and deeper including social and economic factors, as noted above. As these expand across to include social and economic concerns, they go deeper into the complexity of environmental concerns. Establishing the scale of the SEA should be done at early on in the process so that it is clear what can be addressed. With many donor driven programmatic SEAs it is preferable to go as wide and deep as possible in order to be as inclusive and comprehensive. The time frame for a wider deeper SEA can range from 5 months to 2 years, depending on factors such as scope of the program to be funded, range of sectors to be included, and number of countries involved. When multiple countries are involved, the challenges, and rewards, are compounded.

As the scale increases, and the inclusion of social and economic issues become increasingly pertinent, factors ranging from income levels, social and ethnic diversity, political cleavages, public health, income disparity, industrial, agricultural and resource development plans, legislative priorities, planned and present budget allocation, revenue streams, infrastructure investments, human settlement patterns, other donor investments and incentives, election timing, migration, immigration, educational capacity, and international relations, etc., can all come into play. The comprehensiveness of the SEA must be sensitive to

these factors as they will influence the implementation of the SEA objectives and the funded program.

For an SEA that focuses on agricultural development, or shifts in budget support programs the social and economic factors that come in to play will often drive the degree of environmental impact to be considered. The wider the number of sectors involved, the more inclusive the environmental impacts become.

For example: the construction of a border fence may not seem to be immediately pertinent to air quality, but the resulting desertification due to over grazing, and subsequent decline in air quality due to increased particulate matter does increase this concern. This can impact water management issues, biodiversity, waste levels, agricultural resource bases and even regulation issues. Other socio-economic issues can include ethnic divisions, access to markets, infrastructure, access to education, land division and allotment, wealth division, race relations, educational needs, communication, energy needs, border patrol, etc.

Similarly, the shift from rain fed agricultural crops to irrigated crops will certainly impact water quantity and quality, but it may also mean that a valuable carbon sink is lost, thus increasing the overall CO<sub>2</sub> emissions. This shift may also mean a reduction in pesticide uses, and therefore improve potential habitats for increased biodiversity, while putting increased demands on energy resources, waste levels, marine resources from non-point source pollution, etc. The social and economic issues can include (inter alia) retraining of workers, access infrastructure, division of wealth and land tenure, market development, increased housing and community infrastructure demands, impacts on neighboring industries, industrial expansion, national and international market access, etc. In both cases, the expansion into social and economic considerations, increases the environmental impacts consideration, leading to an increasingly complex situation.

Thus, the range of stakeholders involved can expand very quickly from livestock management agents, or farmers to environmental authorities, impacted communities, laborers, public health ministry officials, foreign affairs ministries, labor ministries, etc. As a result of their inputs and solutions, additional stakeholder groups may come in to play with additional environmental impacts and concerns. The SEA Consultant must carefully consider the parameters for the exercise to keep it comprehensive and yet make it manageable.

The scale and scope of the SEA can grow quickly and become over burdensome. Therefore the SEA Consultant and donor representative must clearly decide what will be addressed and what will not be. This should remain flexible, if possible, but should also avoid becoming overly complicated. The intricacy of environmental, institutional, bureaucratic, and social issues are overlapping, and the objectives of the donor and recipient agency should remain the central focal points. This can provide guidance within the wider web of social,

economic and environmental concerns to be addressed by the SEA.

### *The challenge of the SEA in development work*

Within the EU, the US and countries with high acceptance of multi-stakeholder participation in the decision making process, the approaches outlined above work fairly well and are familiar to the decision makers. On the contrary, in political systems that are less experienced in public access to and other governmental sectors stakeholder involvement in the decision-making processes, there are often significant challenges to effectively implementing SEAs. This is not to say developing countries, or countries with newer democracies lack institutional capacity to effectively employ the SEA methodology. Rather the SEA methodology and approach to stakeholder inclusion must be adapted to the socio-political realities of the country/countries where it will be employed, rather than relying on a template that fails to fit the existing circumstances. These challenges are not sufficiently addressed in the current literature on SEA implementation, which tend to focus on SEA implementation in the EU and US. (United Nations University 2006, Therivel 2004, TRL, centre for sustainability n.d., Sadler 1996, Dalal-Clayton 2005)

This challenge in developing political systems is compounded when an external second party donor organization is involved, with it's own institutional requirements for SEAs in order to fund social and economic development programmes. Donor organizations requiring SEAs range from the EU, to the World Bank, and US Millennium Challenge Corporation (a branch of the State Department that provides select countries with significant development support). These organizations have mandates to conduct SEAs prior to full funding of initiatives ranging from agricultural support, to multi-project infrastructure construction, to tourism support, to multilateral energy production and transmission projects. The requirement of the donor organizations to oversee an SEA is often a condition of full funding, but this creates a unique set of challenges. It imposes an assessment mechanism created for use under one type of institutional context onto another institution setting. The results can range from very successful to an exercise in futility depending on if the institutional conditions of the receiving country are respected.

The objective of implementing SEAs as a requirement for donor money is well intentioned. It provides protection to the donor organization to know that the money being given is going to a sustainable effort that will not unduly harm the environment. This enables the donor organizations to demonstrate a proactive environmental agenda when they come under scrutiny by international NGOs with environmental concerns. The SEA requirement also introduces the recipient country to an integrated planning mechanism that is largely viewed as state-of-the-art around the world.

The use of SEA in donor driven projects is becoming more widely accepted by donors and recipients, but the effectiveness of the SEA is largely dependent on

it's ability to obtain multi-stakeholder support from both official governmental and civil society stakeholders, to be integrated in to the existing planning mechanisms, and to be successfully adopted over the long term. The first condition of effectiveness – the ability to obtain multi-stakeholder support from both official governmental and civil society stakeholders, is often the most immediate hurdle faced by those contracted to develop the SEA – the consultant.

SEA consultants are usually drawn from an international pool of experts with areas of specialization ranging from environmental management, to planning, to environmental policy, to biology, to water resource management, to agricultural development, to sustainable development, to industrial engineering, to avian behavior, and beyond. There is no single discipline represented, and as a result the implementation can be widely varied. The SEA consultant is generally hired by the donor organization, and linked with a host-government authority liaison within a partner institution. The project reports the consultant produces are referred to as 'deliverables'.

The first major deliverable in a donor driven SEA is generally the Stakeholder Engagement Strategy. This strategy requires that the consultant outline the identification of stakeholders and the mechanisms and stages of engagement. These are generally drawn from experience of the consultant, and any earlier ground-truthing documents available. The engagement strategies tend to be ambitious, with an idealized assumption of cooperation from all official and civil society. Attention to the anticipated interests of the stakeholder groups helps to focus the strategy, but can often result in a sort of armchair anthropology of assuming salience and motives for collaboration. As an exercise in recognizing the complexity of the issues, and the range of stakeholders involved and impacted by the SEA, this is very useful for the consultants. As a firm game plan for successful engagement, it is likely less realistic, as the complexity of the issues addressed in the SEA are often more vast and laden with context beyond the scope of the consultants first assessment. The Stakeholder Engagement Strategy does identify which stakeholders will need to be contacted, interviewed, and ideally participants in the SEA processes.

In some SEAs, the public, civil society or non-governmental stakeholders can be critical to gaining inputs, developing meaning dialog, and providing long term support. Officials from various governmental sectors, including a vast array of agencies, departments, and ministries, should always be consulted, as they often have more direct influence in the planning processes. Private sector stakeholders, with economic interests should also be consulted, though they will likely vary in their receptivity to the process.

The second major deliverable comes from the scoping study. Ideally, the scoping study enables the consultant to determine the actual interests of the stakeholders, identify individuals who represent the various institutions and organizations to be involved in the SEA, and to define the scope of issues to be

addressed by the SEA. The scoping study is often meeting intensive and assumes availability and interest of stakeholder representatives. It also assumes that the stakeholders will be familiar with SEA processes, friendly to the donor organization, and supportive of the governmental authority charged with overseeing the SEA. These assumptions can be seriously tested, as often governmental officials will already have burdensome schedules, and prefer not to be tasked with additional work of serving as a stakeholder within a particular project. Often they are asked to provide inputs to the scoping study, well aware that additional requests will be made on them, compounded with additional work commitments, which are not compensated. They also may comment that involvement in an SEA, or any donor driven activity also opens them up to increased uncompensated time demands for their departments, while the monetary rewards go to another ministry in the government. This can require significant creativity, patience, and persistence on the part of the SEA consultant and donor organization representative.

Following the SEA Scoping Study, the SEA begins in earnest with the collection of baseline data, review of existing strategies that are related to the SEA topic area, follow up and extended interviews from the scoping study, review of existing relevant legislation, and further identification of additional stakeholders. Again, the coordination with multiple stakeholders can be laden with contexts that the consultant may not be privy to, such as previous personnel disputes, institutional evolution, and other concerns stakeholders are not eager to share. This, combined with stakeholder reluctance to share draft reports, strategies under development, and data that is normally only offered for sale, can create challenges that may seem insurmountable. Other times the data that would usually be needed to support an SEA simply does not exist. Governments that are cash starved, have historical misdirection of funds, and have experienced civil strife are not likely to have the wealth of reliable data on environmental or social conditions that are found more stable political systems.

When taken out of context of a developing country institutional setting, these sort of bureaucratic turf guarding and information gaps may seem completely alien. However, when put into the context in which these challenges exist, acceptance of the local cultural norms may provide the SEA consultant with some degree of insight into the challenges being faced by the government officials where the SEA is to be implemented. This requires a flexible approach to the SEA that is not currently well covered in the literature (ibid), and this situation can leave the consultant with gaps in information that are required to carry out a complete SEA.

Another challenge within the SEA is justification of the SEA and donor initiatives to both governmental and civil society stakeholder groups who perceive themselves to be disenfranchised by the financial distribution system. These groups can use the SEA as a political tool to rally support, and either refuse to participate, or participate in an uncooperative manner, potentially stalling the process if allowed to. Other challenges can arise as some stakeholders actively

attempt to bully members of other stakeholder groups, either interpersonally, or on a broader political scale. Some stakeholders may provide misleading information, and still others may view it purely as a revenue generating exercise. Though remedying this may not fall within the scope of work for the consultant, it can provide important information to the SEA process, and potentially increase the salience of the recommendations.

Challenging development of an SEA under these conditions may not be unique to donor driven SEAs. However, the conditions which enable these challenges to emerge are predominantly found in developing political systems, where institutional boundaries between ministries and departments are traditionally high, technocracy is widely accepted, and socio-political norms do not actively favor harmonious policy development. It must be noted that when the SEA has transboundary involvement, the challenges outlined above are exponentially.

The third major deliverable is the SEA report. This report should adequately reflect the SEA process, the findings and recommendations. Ideally this report will show high levels of multi-stakeholder participation including their inputs into the process, consideration of all of the alternatives for development, areas of consensus among stakeholders, and recommendations based on best available technologies. It will also include a monitoring and evaluation plan with indicators for successful implementation. The standard SEA report is subject to stakeholder scrutiny and public access for 3-6 months, before it is finalized. Stakeholders are critical to the final approval and the monitoring and evaluation process.

Development of an effective SEA under the conditions outlined above are trying at best, but this also illustrates the importance of drawing on a wide range of theoretical and practical tools to bring all of the players to the table with a strong sense of investment in the outcome. The donor organizations must also be willing to accept some degree of variation in SEAs from case to case, as circumstances vary significantly from country to country and SEA to SEA. However, too much variation can reduce SEAs to a box-ticking exercise that fails to meet its main objectives of increasing the strategic inclusion of sustainable development into the planning process. IF SEAs are to become an effective planning tool in developing countries, it must reflect the political culture it serves, but also demonstrate a wider benefit to multiple stakeholder groups.

The remainder of this paper will offer some solutions to these by framing the SEA in terms of common property management and collective action in applied practice.

### *Resistance to SEA involvement*

The resistance of the stakeholders to the SEA can be an unexpected and difficult challenge to the consultant tasked with conducting the assessment in a timely manner, and to the donor organization staff who view their role as a benevolent

actor. The SEA will not likely be productive if the consultant and donor organization representative view the resistance of stakeholders to participate as intentional road blocking. Rather it must be viewed as informative to the whole systems into which this new institutional mechanism, the SEA, is being introduced.

Generally the resistance from stakeholders is due to the perceived threats of the SEA. As noted above, participation in the SEA can be viewed more time and effort from the stakeholder for little actual reward. The requirement of donor organizations that multiple stakeholders participate without compensation can be frustrating to governmental officials who may not appreciate the intrusion from outsiders into their realm of responsibility. Further this intrusion, and the financial backing that comes with it can be seen as a shifting in responsibilities, and a change in the status quo.

It is desirable to have the highest level of official governmental stakeholders involved in the SEA, as the hierarchical nature of most governmental institutions would suggest support at the top will mean support from those below them. However, this can also mean that there must be time available from the officials at the top to meet regarding the SEA Consultant, and that they are willing to buy-in to the benefits of allocating staff and time to the SEA. Further, it can also mean that the primary beneficiary ministry will be given a financial boost or enhanced status, while they will not. This can potentially destabilize the existing status quo among the ministries and agencies within a government, which can lead some officials to be wary of any involvement.

Another factor contributing to official governmental stakeholder resistance to involvement in the SEA process is the view that an external actor/donor, the World Bank, EU, US, etc., is actively instructing their government how to conduct it's business. The result can be a sense of indignation that the donor is intentionally manipulating the government functions of a sovereign state, failing to respect the existing institutional structure, and seeking to buy their way into favor with the existing government. This can be a very politically charged allegation, however it may be raised informally among some high level stakeholders to SEAs. This presents both the SEA consultant and the donor organization with a fragile diplomatic challenge that must be met with prudence.

An equally challenging source of resistance is the perception among governmental stakeholders that the SEA is being conducted as a means for an external actor to examine past mishandling of a situation that is related to the SEA topic. The SEA requests access to a wide range of data, and if anything related to the SEA has a history of potentially disputed conduct, stakeholders are often quite defensive when the requirement of an SEA is presented as a contingency for funding. Again, addressing this concern can be politically and diplomatically fragile, since an unacceptable response to this accusation can lead to refusal of stakeholders to participate that can stymie the entire SEA process.

A final source of resistance is the perception of many stakeholders to view anything connected to “the environment” in planning as costly and punitive measures. The implication is that environmental stewardship will delay development, increase costs for all stakeholders, and decrease the ability of stakeholders to freely pursue their own interests. In economies that are dependent on natural resource extraction, from diamonds, to oil and gas, to agriculture, environmental management is viewed as a long term problem to a short term profit. Therefore, addressing the SEA as a positive sum resource can be difficult, but critical.

The “environment” once routinely referred to as a “public good” has shifted status to “a commons”. Reframing this perception can be the key to overcoming a great deal of the resistance encountered at the governmental stakeholder level, and can offer a means to improve the dialogue among multi-interest stakeholders who previously had been hesitant to become involved in the SEA process. The SEA itself can also become an intellectual and institutional commons, shared among stakeholders who were routinely blocked from communicating due to sector walls of division between agencies and ministries.

#### *Incentives for SEA involvement*

The incentives for stakeholders are as diverse as the sources of resistance. The SEA consultant and donor representatives can collaborate to assuage the fears that are the source of resistance, and help the stakeholders identify incentives for their cooperation in the SEA process.

First and foremost, it should be clearly spelled out to stakeholders that their participation in the SEA process can come with support. The support may come as financial, but also logistical. For example, the governmental official who is already overburdened, short of staff and working under tight budget constraints may benefit from potential dedication of wider donor program funding, once the specific needs are identified, either as it relates directly to the SEA or beyond within the donor portfolio. If the needs of her agency are clearly delineated, and tied to a wider strategic plan, the donor representative, the SEA consultant and the stakeholder may be able to refine funding sources within the SEA program, or with the support of other donors. Identification of clearly articulated programmatic funding needs is a significant challenge for donors with resources waiting to be allocated.

For the reluctant stakeholder who is concerned about the status of their own agency/department/ministry in comparison to others, participation in the SEA process has an additional benefit of developing stronger ties with donor organizations. This is a boon to the stakeholder if they have potential solutions and need the means to resolve their particular challenges. Alternately, the SEA consultant and donor representative may be able to offer solutions drawing from

other experiences. By being coaxed into participating in the SEA, the reluctant stakeholders are able to voice their concern about their own priority needs to the donor representative and the SEA consultant, and other similar stakeholders who may be involved in similar issues. Further, through the SEA process these concerns and priorities needs may be raised, and the means to resolve them in a sustainable manner can potentially be showcased. This is especially true of the SEA is the deepest combined social, environmental and economic sustainable development focused approach.

The concerns about maintaining the status quo of the existing institutional hierarchy is generally reflected in those who are already higher in status. Their willingness to participate can mean taking a step down to work with stakeholders who are “below” them in rank or level of influence within the government. They often are already over-burdened and hesitant to take on additional commitments. Unfortunately, without their buy-in, it is extremely difficult to get others below them to participate, from attending meetings to releasing data.

These high level officials may also be concerned that the SEA is being imposed from the outside, and that it may be used by the donor organization to look for abuse of power within the government. If high level officials suspect that they will be judged, or that less successful activities will be highlighted they will likely be unwilling to participate. Therefore it is critical for the SEA Consultant and donor representative to assure them that the SEA is not a tool to judge how a program has been implemented prior to the SEA. Rather, the SEA must be future oriented and brings an added value of integrating the information available to improve sustainability of the future implementation. It is easier to say this up front so that the high level official does not have to voice his fear about exposing anything untoward that may have occurred under their tenure.

The high-level decision maker stakeholders must see the value to them and their organization in order to be convinced to participate, or to encourage their subordinates to participate. The SEA consultant and donor representative must allay all concerns that this will be an intrusive exercise, but rather will be providing critical support to the success of the planning and implementation of programs which the donor will be providing funding. It must be presented as a win-win scenario for all participants, or the process will stall before it ever starts.

Once the high level stakeholder support is gained, and a subordinate has been selected to support the SEA, the next concern is the availability of data. Within developed stable bureaucracies data is routinely collected and widely available. In developing countries the data may or may not exist, be available, or be in a useful format. The task of the SEA consultant is to gather and assess the data that is available. Where gaps in data exist, it may be possible to allot some of the larger programmatic funding to supporting data collection. For multiple agencies, the collection of centralized data, and sharing of data can open new doors for communication and collaboration that were previously closed.

As the SEA process evolves it is critical to maintain a focus on the environmental aspects being addressed. This can be especially useful to garner support from reluctant stakeholders. There are few stakeholders who will directly state that they do not favor environmental stewardship. Some will see environmental management as a cost to their business, but they will generally agree that a cleaner environment is preferable to a polluted environment. In situations where there is bullying among stakeholders this can be the initial focus of the common concern. It begins to level the playing field and serve a common interest shared by all stakeholders. Even if the concern for the environment is not strongly salient among stakeholders, they are generally willing to appear to be supportive of environmental concerns. Over time, they may become more honestly invested, once they see that environmental degradation is actually more costly to them. This can be a prime benefit of the SEA process with multiple stakeholder groups participating.

For other stakeholders who are more invested in environmental protection from the start, the SEA provides a forum for them to make their case to those who are more reluctant. The SEA consultant must help to temper this in meetings so that it does not become accusatory or divisive. On the other hand, if the focus is forward oriented with the SEA helping to avoid costly environmental mismanagement, the benefits to all stakeholders become increasingly obvious. As these emerge, the SEA itself becomes a jointly managed, commonly held good which can provide diffuse and particular benefits to a wide array of stakeholders.

These benefits will vary for each stakeholder group, and even individually. The benefits may even be positive externalities of increasing ties and identifying common concerns of multiple sectors. It is vital that the SEA Consultant work diligently to help bring these benefits to light and to increase the positive benefits for all stakeholders concerned.

#### *Suggested sample strategies for SEAs implementation in developing countries*

First and foremost, the SEA Consultant must be focused on the benefit of the SEA for all parties concerned. This task demands patience, creativity, and empathy. Also, the SEA Consultant is well advised to be familiar with the SEA methodology standards, and possess a strong familiarity with institutional design and influences, as well as a high degree of versatility in environmental stewardship. Without these, the SEA will likely be a much more arduous task than warranted, and risks leaving the recipient country with a bad impression of the effectiveness and benefit of the SEA process.

The SEA consultant can act as a vector for information between departments, agencies and ministries in the early meetings, and those throughout the SEA process. This cross sector vectoring of the SEA consultant becomes increasingly

important as the SEA issues emerge and the SEA process seeks to address these. This is especially true if coordination of large multi-stakeholder meetings are untenable, and multiple visits to multiple stakeholders are the mechanism for conducting a significant portion of the SEA.

When stakeholder reluctance remains high, the SEA Consultant must become a conduit for information, relying on diplomatic finesse, and an open mind. As a rule the SEA Consultant should assure all stakeholders being interviewed that no individual or directly quoted in any report. The SEA Consultant must listen closely and carefully to the various stakeholders as they discuss the issues pertaining to the SEA, their own reservations about the SEA, and other issues at hand. It is critical that when key information emerges, it is used as effectively as possible, but that there is no judgment of the motives, actions or comments of the stakeholders. This is often especially challenging, but in order to give the stakeholder an open forum to express himself or herself, they must feel comfortable in saying what their concerns are. If the consultant does not agree with the statements, he/she should not repeat them to others, but they should be taken as informative to the mindset of the specific stakeholder.

Respect is often the most highly valued currency among officials and all stakeholders, and is a valuable asset for any SEA Consultant. It is gained by sharing it. Being willing to work with a stakeholders schedule, listen attentively to their concerns, and sharing with them the long term benefits to them of providing inputs to the SEA can be the key to a successful SEA interview. Once a positive relationship has formed, the stakeholder will often indicate others who can make useful contributions to the SEA. The SEA Consultant must follow up in these leads and work to get these interviews as well. If a new interview subject knows another colleague has recommended that they speak to the SEA Consultant, they are usually more open to scheduling meetings.

When it is possible to conduct a workshop, or a larger meeting, assume that the participants are doing the SEA Consultant and donor organization a kindness, which should be acknowledged. All information in the meetings should be made accessible through as many channels as possible. The SEA Consultant should present the general common concerns without pinpointing any individual. Where there are major differences between stakeholders, they should be presented as varying concerns but maintain a focus on the commonalities and potential solutions to the difference before opening it up for discussion. Throughout the presentation/workshop/meeting the emphasis should be on the important cross-sectoral benefits of increasing support for the SEA, with openness to recommendations and environmental stewardship as the key objective.

When drafting the SEA the stakeholder consultant must maintain that the recommendations are cost effective and stem from the stakeholders own concerns. Additional recommendations may be included, but should be vetted by stakeholders prior to including them in the report. To increase the sense of

ownership, stakeholders should see their own interests and ideas reflected in the text. For especially complex issues, tradeoffs may be necessary, but wherever possible emphasize positive sum scenarios, rather than first choice options for all stakeholders. The SEA report should emphasize that tradeoffs can also lead to increased environmental stewardship overall, with increased awareness of the interconnectedness of issues and actions among stakeholders.

### *Conclusion*

The SEA process has a great deal to offer both planning and policy realms, with long term benefits, real sustainable development, and potentially improved relations among stakeholders. The challenge that faces those in the applied practice of SEA, as well as those studying both environmental management, planning and policy, is remaining true to the objectives, while maintaining institutional flexibility. The application of directives, methodologies, and approaches developed under one set of circumstances to alternative scenarios requires an appreciation of the obstacles and norms of each specific case. The use of SEAs can be positive in situations where they are donor driven, if the application fits into the existing institutional structure. This can be significantly supported by framing the SEA and the environmental as a common property resource which each party bears both responsibilities and benefits from its outcome.

Many questions, challenges, and unforeseen barriers continue to emerge in the SEA application in multiple developing political systems. The approaches used, the successes, failures and lessons learned can provide valuable insight to the processes in which these decisions are made. There is an urgent need to provide reasoned, experience based insights to this practice. The scholarly literature, applied information and theoretical approaches have tremendous potential to come into harmony around approaches such as the SEA.

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