





Learning by doing: strengthening the capacity for EIA in Burundi

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Many training or capacity building programmes are based on the provision of theory and technical information, with application in practice coming afterwards. Adult learning theory is based on the opposite: learning starts from experience and with experimentation. Adults bring with them the experience amassed during their lifetime that is related or unrelated to the programme's theme, and this influences the way they filter, analyse and apply new information. Ignoring their experience may have an impact on the effectiveness of the activity or programme: the participants may not appreciate the information in the way intended by the person providing it. With this in mind, when Burundi's Ministry for the Environment asked for help in preparing it for its new EIA duties, the NCEA proposed a multi-year, adjustable *learning-by-doing* approach. This article describes this approach and how it worked in practice.

* In November 2014, this directorate was renamed Directorate for the Environment and Climate Change (with the French acronym DECC).

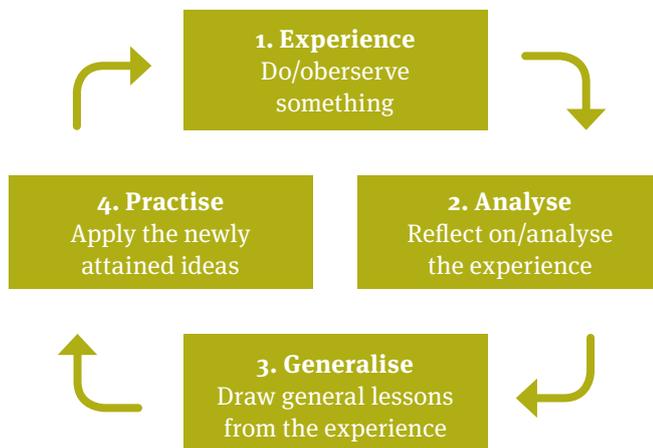
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A young system

Burundi adopted an environmental impact assessment (EIA) regulation relatively recently, in October 2010. While waiting for it to come into force, Burundi’s Ministry for Environment realised that they – specifically the Directorate for the Environment (DECC*) – did not have the capacity to fulfil their mandate to administer the new regulation. The regulation laid responsibility for the technical review of the quality of EIA reports for all public and private projects and for monitoring on a small and young team, none of whom had been specifically trained in EIA. Some staff had been reviewing EIA reports on an ad-hoc basis, but without any coherence or consistency in approach or output. No working tools or methods had yet been developed. Under the new regulation, the number of EIA reports to be reviewed would increase every year, adding to the team’s numerous existing duties. Where - and how - to start?

Agreement for cooperation

The NCEA not only saw a need to build capacity at the DECC and with other actors in the EIA system but also believed that the draft EIA regulation was flawed at several levels. However, after many years, having finally reached the point of having the draft legislation ready to be signed by the president of the republic, the Ministry saw no scope for changes. The NCEA nevertheless agreed to assist, on the assumption that with increasing experience of using the regulation, its flaws would become more apparent, so that the discussion on its improvement would remain on the agenda. From the outset, both partners recognised that the capacity to absorb new knowledge and practices at the DECC was limited: a small team with high workload, and with a small financial basis for EIA. The NCEA does not provide funds for activities, it only makes available in-kind technical expertise and guidance. The partner organisation is responsible for financing the activities to be carried out. The Ministry, however, did not have a budget earmarked for EIA, which means that their budget for joint activities with the NCEA (such as training sessions) was also limited. Despite those limitations, the Ministry showed commitment, and a three-year Memorandum of Cooperation was signed early 2011.



Adult learning cycle

The adult learning cycle consists of four steps, always starting with experience: observing existing experience or adding new. It can be repeated in smaller or larger cycles: during a single training session of one hour or in the entire capacity development programme.

How did the NCEA get to work in Burundi?

The NCEA got to know representatives of Burundi's Ministry for the Environment through the Central African EIA capacity development PAANEEAC programme (see page 58 in this publication). Together with them and the national association for EIA in Burundi, in 2006 a diagnostic analysis of the national EIA system had been carried out ('EIA Mapping') in preparation for that programme. A shared understanding of the basic capacity problems and the system itself therefore already existed, which is why the Ministry decided to ask the NCEA for long-term technical assistance in 2009. As soon as the EIA regulation had been formally adopted, the first three-year Memorandum of Cooperation was signed.

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How to build capacity?

Step by step and flexibly

With the above in mind, the approach to strengthening capacity has been stepwise, linked as much as possible to the day-to-day practice of DECC. The number of activities is kept at a maximum of three to four per year. Although objectives have been set for the programme and activities have been identified for its duration, detailed planning is done on a yearly basis, with flexibility to adjust the programme based on the evaluation of progress made and lessons learnt in the previous year. This works really well: each partner has requested changes in schedule during busy spells, and the other partner has accommodated this flexibly. But changes in focus have also been accommodated when other needs were found to be more urgent than anticipated.

Through learning-by-doing

Rather than organising more traditional training sessions from which the lessons learnt might be hard to integrate in everyday working practice, it was decided to organise joint exchange and learning sessions. Sometimes this simply means that an NCEA representative is seconded to the Ministry and is available to answer questions. At other points, more formal working sessions are organised, with a few DECC staff or the entire team. During these sessions, the NCEA provides content on an issue, facilitates exchange, analysis and experimentation, and ultimately guides the Ministry in deciding how to integrate that issue into the system. The actual learning approach differs per topic but is always based on adult learning theory, which starts from the theoretical baggage and practical experience brought along by each adult when starting a new learning process, as demonstrated in the figure on the opposing page. This way, step by step, skills are developed, approaches are synchronised among DECC team members, and quality in work becomes more consistent across the directorate. An important effect is that ownership of working methods and approaches becomes strongly felt by the individual team members, as they themselves decide what they consider the best option for them, for the EIA system and for environmental management in Burundi.

Examples of how these principles are being applied in this programme are provided in the following paragraphs.





“One great advantage of a demand-driven way of working is that it allows for flexibility in planning.”

A demand-driven approach requires flexibility

One great advantage of the NCEA's demand-driven way of working is that it allows for the flexibility in planning that was mentioned above. An example is work on EIA screening. The Ministry initially considered screening to be a priority for the start of the programme: many projects in Burundi are not submitted to the EIA procedure, even though this is required under the EIA regulation. Once the EIA regulation came into force however, more pressing needs became apparent almost immediately: for example, for review. A lack of experience in review is one thing, but how can a review be conducted if there are no evaluation frameworks to guide review work? Scoping did not exist as a step in the EIA procedure, and therefore no Terms of Reference were produced that could serve as such an evaluation framework. These problems were predictable but were truly felt only after the EIA regulation was enforced and the Ministry was confronted with them. As soon as work on reviewing started, the absolute priority for DECC became improving review capacity and introducing scoping. The focus of the NCEA's support therefore shifted. How this was done is described in the next examples, while products that were jointly developed for scoping and review are listed in the box on the opposite page. Meanwhile,

Products of cooperation

During the first three-year programme (2011-2013), a range of products was developed jointly by the Ministry and the NCEA:

- A scoping procedure, which led to the publication of a Ministerial decision on Scoping;
- Standard Terms of Reference for ESIA;
- A format for the review report, including formulation of the review's conclusions;
- Internal Review protocol, stipulating the steps to be followed by DECC staff when carrying out a review;
- A draft EIA manual including all of the above, produced together with the ABEIE, the National association of EIA professionals in Burundi.

In addition, the NCEA produced several advisory reports, among others on:

- analysis of the legal framework for EIA;
- environmental norms and standards;
- manuals for EIA.

These can all be found (in French) on the NCEA's website, including an evaluation report of the first three-year programme.

however, work on screening has not been forgotten: currently, with the help of the NCEA, the screening procedure is being revised and the lists of categories of projects that need to undergo EIA are being updated.

Example: learning-by-doing approach for scoping

In the 2010 EIA regulation, scoping does not exist as a step in the EIA procedure in Burundi. Furthermore, the function of scoping was not well understood by the Ministry. A learning-by-doing approach was proposed by the NCEA, based on adult learning theory (see figure 1):

- Rather than just advising on how to introduce scoping, the NCEA first facilitated a training session on the concept and its function in relation to the rest of the EIA procedure. This was done starting from lessons learnt from a variety of scoping systems elsewhere, and by discussions on whether participants recognised these experiences (*Step 1: experience*).
- After this exchange of knowledge and experience, DECC staff themselves analysed what would work in Burundi and what would be desirable and feasible, based on experience with the national system (*Step 2: analyse*).
- With guidance from the NCEA, they then drew up an approach for scoping in Burundi (*Step 3: generalise*). The selected approach includes the Ministry providing standard Terms of Reference for an EIA report, which will then need to be adjusted by the project proponent on the basis of public participation, in order to make them project- and location-specific. DECC will then formally approve the ToR before the proponent can start to carry out the EIA. This approach was accepted by the Minister, who, instead of waiting for a revision of the regulation, signed and issued an interim Ministerial Decision on Scoping in January 2013.
- To assist implementation (*Step 4: practise*), the NCEA facilitated a series of technical sessions on the elaboration of these standard ToR, again on the basis of a joint analysis of pros and cons of ToR applied elsewhere.

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The legal framework: should it be revised?

Gradually, after a couple of years of experience with the EIA regulation, the Ministry's staff are beginning to appreciate its strengths and shortcomings. The step-by-step coaching and learning by doing helped with this: it led to more insight into the appropriateness of the current legal framework for EIA, and a better understanding of its flaws and how to deal with them. A manual was drafted in which the newly developed elements were included. A new EIA mapping workshop was held in 2013. All in all, the Ministry became convinced of the need to revise the legal framework in order to formalise all newly developed instruments and lessons learnt into a more efficient, lean and effective E-S-IA (including social!) system.

A new three-year Memorandum of Cooperation was signed in 2014, in order, among other things, to work on this revision. Considerations for the revision include:

- The revision of the legal framework for ESIA will be part of a larger revision of the entire environmental management system in Burundi, for which the Ministry hopes to secure sufficient financing to be able to engage a consultant.
- While waiting for this financing, the NCEA proposed guiding the Ministry staff during their reformulation of the new ESIA system. Technical and legal support will be made available.
- In part, this means working with the results produced under the first three-year programme. In addition, weak or missing elements, such as screening, public participation and transparency of the procedure are being developed through learning-by-doing approaches similar to those used for scoping and review (see main text).
- In addition, input from other ESIA professionals in Burundi has been invited through the participation of the ABEIE, Burundi's national association for EIA.

“Flexibility in planning does not mean being less result-oriented.”

By the end of the three-year programme, DECC staff were already starting to see an improvement in EIA reports, as these were now increasingly being based on the standard ToR. All DECC staff have indicated they use the new standard ToR as a verification tool for reviewing the quality of EIA reports, which makes their review work faster and easier. What is not yet being applied correctly is the step in which the project proponent adjusts the ToR to the project and submits them to DECC for approval. The project proponents need to be made aware of how to do this. This will be addressed in the near future.

Example: learning-by-doing approach for EIA review

To build capacity for review of EIA reports, DECC requested training for its staff. Instead, the NCEA proposed a learning-by-doing approach, again based on adult learning:

- First, carry out a joint assessment of existing EIA reports that have already been reviewed and approved, by re-examining them together (*Step 1: experience*). This improves understanding of the quality of review practice so far, including among DECC staff, and hence improves understanding of specific training needs.
- The sessions showed that much needed to be done at the level of an individual's skills, but first and foremost on working method and consistency (*Step 2: analyse*). Each member of staff reviewed in a different way, producing a different kind of report and using different sources as reference. Review was always done, even if the EIA report was of such bad quality that it did not merit reviewing.

- Lack of a proper archive or database led to the situation in which EIA reports of similar projects were hardly ever consulted. As a result, review conclusions differed, depending on who had done the review.
- Using these findings and facilitated by the NCEA, the participants then elaborated (*Step 3: generalise*) and tested (*Step 4: practise*) a standard review protocol, and a standard format for the review report, including a formulation for the review conclusion.

Today, DECC staff say they have become much more consistent in review practice and reporting. They abandon the review if basic requirements have not been met in the EIA report. They all say they use the standard reporting format. And increasingly, review is done by two staff members and by staff who have previously reviewed projects in that sector. This approach has had an important side-effect: team building, because in order to know what should be improved, everyone has to share weaknesses in review skills.

Lessons learnt: does learning-by-doing work?

The approach to capacity building based on flexibility and learning-by-doing seems to have worked very well so far in Burundi.

Flexibility in planning does not mean being less result-oriented. On the contrary, and interestingly, although the programme in Burundi changes almost every year, most of the activities identified are eventually carried out. Being able to adjust to the sometimes unpredictable ups and downs in DECC's day-to-day practice has ultimately allowed most activities to be carried out, albeit often at another stage in the programme.

Making use of existing experience within the team and elsewhere, jointly analysing this experience, and together working on new instruments, has enabled the sessions and solutions to be tailor-made and the results to be immediately implementable in DECC's day-to-day work. In the past, DECC usually engaged consultants to develop policy instruments or legal texts. Doing this work themselves, step by step, has been faster, cheaper and - most importantly - has fitted much better with Burundi's specific needs. Also, all staff fully understand the logic and reasoning behind the instruments, know how to apply them, and are strongly committed to their application.

A reorganisation of the executive capacity is underway, with the creation of an agency for environmental protection (Office Burundais pour la Protection de l'Environnement: OBPE). These changes represent opportunities but also risks in the sometimes unpredictable political context of a fragile country like Burundi. Yet the signals are positive. It seems that investing in gradual changes at the technical level is sustained and may eventually lead to more structural improvements. The reorganisation will undoubtedly bring new priorities for DECC – the flexibility in the collaboration will allow such adjusted demands to be incorporated into the programme.



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