



Netherlands Commission for  
Environmental Assessment

# Programme to support National Associations for Environmental Impact Assessment in Central Africa

Evaluation Report



<<ON EST ENSEMBLE>>

Partnerships for better governance of economic development:  
coaching a professional self-organisation



## **COLOFON**

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## Acronyms

CEEAC	The Economic Community of Central African States
CEMAC	Commission de la Communauté Economique et Monétaire de l'Afrique Centrale – Commission of the Economic and Monetary Community of Central Africa
CLEEA	Capacity Development and Linkages for Environmental Assessment in Africa (CLEEA)
COMIFAC	Commission des Forêts d'Afrique centrale – Commission of Forests in Central Africa
DGIS	Directorate General International Cooperation of the Netherlands ministry for foreign affairs
EIA	Environmental Impact Assessment
IAIA	International Association for Impact Assessment
NA	National Association (of impact assessment professionals)
NCEA	Netherlands Commission for Environmental Assessment
NGO	Non-Governmental organisation. <i>Environmental NGOs</i> are in this report defined as NGOs having as their mission to protect environment and nature.
PAANEEAC	Programma d'Appui des Associations Nationales pour Evaluation Environnementale en Afrique centrale – Project to support the development of national associations for impact assessment in Central Africa
PEEA	Partnership for Environmental Assessment in Africa, a revolving fund linked to CLEEA.
RACEEAC	Réseau des Administrations en Charge de l'Evaluation Environnementale d'Afrique Centrale – Network of administrations in charge of impact assessment in Central Africa
REPAR-CEFDHAC	Le réseau des parlementaires au niveau de l'Afrique Central qui œuvre pour la bonne gouvernance dans tous les secteurs qui concernent les ressources naturelles, y compris la gestion de l'environnement – The network of parliamentarians seeking good governance in all sectors affecting natural resources, including their environmental management
SEA	Strategic Environmental Assessment
SEEAC	Secrétariat pour l'Evaluation Environnemental en Afrique Central – Secretariat for Environmental Evaluation in Central Africa
SIFEE	Secrétariat Francophone en Evaluation Environnementale – French Secrétariat for Environmental Assessment

# 1. Summary

## **PAANEEAC**

The programme to support national associations for environmental impact assessment in Central Africa is known after its French acronym PAANEEAC. It was a small grants programme supported by the Dutch Ministry of Foreign Affairs. After a preparation period of several years, it was implemented from 2008 to 2013. In 2013 the Netherlands Commission for Environmental Assessment (the NCEA), managing PAANEEAC on behalf of the donor, evaluated this programme. PAANEEAC's mission was to support national associations of Environmental Impact Assessment (EIA) professionals and their Secretariat for Environmental Evaluation in Central Africa (French acronym SEEAC) in Central Africa. Their objective was to improve EIA systems, with a view to good governance, poverty reduction and sustainable development. EIA is a public legal procedure that makes transparent how the government takes environmental and social impacts into consideration when it gives its consent to development projects.

PAANEEAC enabled EIA professionals to organise a platform for debate on the subject of 'steps toward better EIA practice'. These professionals work in administrations, NGOs, universities, consultancies in Burundi, Cameroon, Congo Brazzaville, Central African Republic and Rwanda. They were, and still are, organised in national associations of EIA professionals (NAs). NAs joined up in the Central African sub-regional association SEEAC. Hundreds of professionals participated directly in the activities the NAs and SEEAC organised, and connected through their newsletters and informal meetings. About 75 of these professionals and members of their networks have been interviewed in PAANEEAC's evaluation.

## **PAANEEAC's input**

PAANEEAC used a budget of approximately €2 million. The donor has made about 60% of this budget available under the small grants scheme of PAANEEAC. The other 40% was provided in kind as NCEA's input (management, management coaching and technical assistance). PAANEEAC enabled associations of impact assessment professionals to function as proper organisations, capable of attracting and servicing their paying members. This was done through seed funding: a modest €8 500 per year was dedicated to the general functioning of each association. An accompanying programme had the form of a flexible menu of specific activities for which the association could obtain funding. To that end, approximately €20 000 per year per association was available.



The donor financed six permanent African staff, and the NCEA financed two part-time NCEA experts. EIA professionals in Central Africa have put in significantly more time on a voluntary basis.

### **PAANEEAC's output**

Output consisted of activities at national and at sub-regional level. Main activities were (not exhaustive):

- National EIA mappings: seminars to diagnose the national system of EIA, carried out in 2006 and in 2013.
- Annual general assembly meetings.
- Thematic seminars at national and sub-regional level.
- Training sessions focused on specific EIA knowledge and skills, and training of trainers in EIA.
- Studies on environmental norms and on the financing of national EIA systems.
- Joint projects with EIA administrations, to design and implement systems for management of data, legislation in CAR and Cameroon, and an operational manual in Burundi.

Respondents generally indicate that activities in this programme were successful. Sufficient participants took part in these activities, and membership of NAs grew, including paid membership.

Another output comprised management (e.g. contracts, annual plans, annual reports, project proposals). The NCEA developed a management system that facilitated the NAs to undertake goal-oriented activities. NAs remained in charge within management principles that had been agreed at the start. A key management principle was that payments of NAs were conditional upon the NCEA's approval of management documents.

### **PAANEEAC's outcome**

The NAs had specified the following desired outcomes in advance. The quotes are translations that stick close to the original French. It should be realized that PAANEEAC is only one – perhaps modest – factor producing these outcomes:

- *'A functional framework for dialogue between professionals exists.'* Respondents unanimously think this outcome has been achieved. There is now free debate between the actors of EIA, and EIA administrations participate actively (also at sub-regional level). On the other hand, there is also underdeveloped participation of important stakeholders, which have EIA professionals in their staff.
- *'The professionals of EIA are well organised.'* Respondents unanimously think this outcome has been achieved to a considerable degree. The networks function well, including the synergy between national and sub-

- *'The EIA professionals adopt best practices'*. Most respondents say that this outcome has been insufficiently achieved. However, as a result of training and a developing EIA practice, this is slowly improving.
- *'EIA professionals observe the rules of rigor of professional ethics.'* This outcome has not been achieved in a formal sense because NAs have not made any conclusive statement about professional ethics. On the other hand, ethical dilemmas are a motive of professionals to participate, and they are discussed. As yet, there has been little debate in NAs about the idea to establish an order of EIA professionals.
- *'The different initiatives for capacity building are coherent and synergetic'*. Most respondents are satisfied with the outcome. Training at national and sub-regional level, and of professionals and trainers, is seen as PAANEEAC's core outcome. NAs have established curricula, which are now pursuing financial independence of PAANEEAC. Ties with universities have been strengthened to some extent.
- *'Legal dispositions of good quality exist'*. Such dispositions include the whole set of texts needed to properly regulate all aspects of EIA, and during PAANEEAC it was understood to include the whole regulatory chain, from strategic decisions to enforcement of permit conditions. Major improvements of these dispositions have been made, for example with respect to elaboration of procedural steps and the financial solidity of the procedure. A number of these improvements are still in the pipeline of decision making. There are also serious initiatives for sub-regional harmonisation, for example through the establishment of a Network of Administrations in charge of Impact assessment in Central Africa (RACEEAC) under the economic community of Central Africa, CEEAC. Finally, debate has gradually shifted from EIA to the other links in the chain of government tools to regulate economic development. For example, inspection is seen as a weak link.
- *'The norms and directives in support of EIA are available.'* The lack of these norms is still a major weakness, as a study under PAANEEAC has shown. It is now much higher on the agenda of EIA administrations.
- *'The responsibilities with regard to management of the procedure and of decision making are clearly attributed.'* In hindsight the assignment of responsibilities was not the real problem. Rather, the problem was the lack of formal requirements with respect to transparent decision making. For example, the requirement to publish environmental permits, including their justification, with reference to the EIA. During PAANEEAC, this was discussed but little progress was made. As a result, the challenge has been better defined, for example with respect to inspections, and in some countries decentralisation.
- *'Financial resources needed for efficient management of the procedures are secured'*. In each country this financial situation has improved. However, it is

- *'The actors have the competences and information to participate in EIA'*. This outcome has been achieved to a great extent. Training sessions were highly appreciated. EIA has now been implemented in each country at a basic administrative level. However, larger groups, outside the inner circle of professionals, have not been reached for training or information as yet.
- *'A system for management of data about EIA exists'*. This outcome has not yet been achieved, but NAs have started joint projects with the national EIA administrations to develop central databases.
- *'The stakeholders are associated to every step of the EIA process.'* This has not been achieved. It is still weakly required by legislation. It is hardly put in practice. EIA professionals are keenly aware that this is necessary if EIA is to become really influential.
- *'The criteria for approval of EIAs and decision making are known by all.'* Respondents mostly indicate that these criteria are known by all because legal criteria are published. But in reality only the inner circle of professionals knows about them.
- *'The stakeholders have and use a right of appeal.'* In all countries they have such a right, but it is not used because decisions are not published; people are not aware that there is a decision they might challenge. *'Deficiencies of good governance are denounced.'* These are freely discussed in meetings of EIA professionals. Several respondents indicate that it has influence on the official agendas.

### **PAANEEAC's impact**

It is too early to observe clear impact e.g. on good governance, poverty reduction and sustainable development. In any case, it would be difficult to attribute any observable changes to PAANEEAC. Many factors influence development, and government's influence on it is often modest. Most interviewed professionals are optimistic about impacts. EIA is seen as an invaluable link in the regulatory chain, and a step toward good governance. Professionals regard those things as instrumental to national ownership of sustainable development, for which they are highly motivated.

### **Analysis**

Overseeing input, output, outcome and impact, respondents indicate:

- PAANEEAC has enabled EIA professionals to organise themselves
- Three elements were essential: seed funding, technical assistance, and management coaching. These elements were synergetic.
- There was also strong synergy between the sub-regional and the national level. There was efficiency gain and a peer process.
- In this way, the EIA professionals could create influential platforms for dialogue.

- The NAs now have the management skills to continue this performance, and to find other sources of funding.

Important success factors were:

- The donor and NCEA patiently allowed a long but constructive preparation time.
- The NAs were in charge of PAANEEAC within the framework agreed at the start with the donor Directorate General International Cooperation (DGIS) of the Dutch Ministry of Foreign Affairs and Kingdom Relations and the NCEA. This framework enabled the NAs to develop leadership, needed to animate a network of professionals. In particular the resulting cross-fertilisation between civil society and government is remarkable in this sub-region of Africa.
- The NCEA has coached the NAs to perform within the agreed framework and to professionalise their management. Transfer of payments was conditional upon approval of management documents. NCEA has done this strictly without interfering with the choices the NAs made within the framework.

In other words, PAANEEAC helped countries take ownership of sustainable development by working with associations of EIA professionals. A chapter with reflections analyses the envisaged mechanisms behind this rationale in more depth.

The time and effort needed for management coaching was initially underestimated.

### **Recommendations**

The report has recommendations for NAs, SEEAC, EIA administrations, the NCEA and donors (and similar organisations in other regions). Recommendations relate amongst other things to the status of NAs and to their funding.

## **2. Introduction**

From 2008 until 2013, the programme to support the development of national associations for environmental impact assessment in Central Africa (French acronym: PAANEEAC) has been implemented. This report evaluates this programme, as foreseen at its start (NAs & SEEAC, 2006).

In this introduction we introduce the programme, its contributors and the evaluation. Appendix 3 provides background information to readers who are less familiar with EIA in Central Africa.

## 2.1 The PAANEEAC programme

PAANEEAC's objective was to 'allow national associations for environmental assessment to contribute efficiently to environmental assessment as an instrument of good governance, poverty abatement and sustainable development'. Environmental assessment was seen as 'the whole of processes that aim at integration of environmental and social impacts in decision making'. The most well-known form of environmental assessment is EIA, which is aimed at government consent decisions about development projects. Governance is not clearly defined in the original project documentation.

In the later 1990's and early 2000's, the idea of PAANEEAC was born in the meetings of the African network Capacity Development and Linkages for Environmental Assessment in Africa (CLEEA). One of its members, the Secretariat for Environmental Evaluation in Central Africa (French Acronym SEEAC), is a sub-regional (Central African) association of national associations of impact assessment professionals. It has member associations in more than 10 countries. The Netherlands Commission for Environmental Assessment (the NCEA) was enthusiastic and the Netherlands Ministry of Foreign Affairs, directorate-general international cooperation (DGIS), was prepared to provide financial support.

In a nutshell, PAANEEAC has consisted of the following chronological events:

- Around 1998 Start of Dutch EIA assistance in Central Africa
- Around 2003 Concrete ideas for a programme emerged in the framework of CLEEA, where SEEAC and the NCEA came together.
- 2005–2006 SEEAC and its member associations wrote the project document that would be used to apply for funding with DGIS. The objectives and approach of PAANEEAC were formulated together with the NCEA. The existing situation of EIA in the participating countries was mapped to understand country specific needs. To this end, the NCEA developed a diagnostic tool ('EIA mapping'). The project document included the results of this mapping and a specific approach for each country and action plan for each association.
- 2006 DGIS approved the requested budget. It designated the NCEA as manager of the fund. A Memorandum of Understanding was agreed between DGIS and the NCEA. The NCEA proposed to delegate management and coordination tasks to SEEAC where possible.
- 2008 Start of PAANEEAC. Most associations needed until the end of

2008 to acquire a formal status. This enabled them to apply for a bank account. The NCEA made individual contracts with all associations about the conditions of operation of PAANEEAC.

2012 After the agreed 5 years of PAANEEAC, the goals were not yet fully achieved and budget remained. It was agreed with DGIS that the programme with existing budget was extended by one year.

2013 This was a year of intensive activity in PAANEEAC. A second mapping of EIA systems was done. Professionals wrote a book about their learning process. A closure meeting was organised in Douala, Cameroun.

## 2.2 The contributors

SEEAC is the focal point in Central Africa of the network CLEEA, and represents national associations of 11 Central African countries. At sub-regional level (the sub-region of Central Africa), SEEAC interacts mainly with organisations such as CEEAC-ECCA, the economic community of central African countries. SEEAC formed the interface between the NAs and the DGIS/NCEA, as coordinator and manager of the PAANEEAC programme.

National Associations are not-for-profit organisations, potentially connecting all stakeholders of the national EIA system. These stakeholders include different sectors and layers of government, consultants and environmental NGOs, all using EIA to achieve certain environmental or social interests. Such organisations may consider some of their staff to be EIA professionals, or such staff may have a personal interest to be a pioneer of EIA in their organisation.

The Netherlands Commission for Environmental Assessment (the NCEA) managed the PAANEEAC programme on behalf of the donor. At the same time it was available as technical assistant to the NAs and SEEAC, and to other actors in the sub-region trying to improve EIA.

Some SEEAC members (Sao Tomé and Príncipe, Equatorial Guinea, Angola), did not participate in PAANEEAC, for different reasons. Chad took part in the preparations, but did not manage to participate due to legal problems. The Republic Democratic of Congo (RDC) and Gabon withdrew from the programme during its implementation; they had not stayed within PAANEEAC's framework as had been agreed in the beginning.

The following table shows the associations that have been involved in the PAANEEAC programme until the end.

**Table 1. The National Associations for impact assessment (NAs) that have participated in PAANEEAC until its end**

Country	National Association (NA)	Abbreviation
Burundi	Association Burundaise pour les Etudes d'Impacts Environnementaux (Burundese Association for EIA)	ABEIE
Cameroon	Association Camerounaise pour l'Evaluation Environnementale (Cameroonesse Association for EIA)	ACAMEE
Congo Brazzaville	Association Congolaise pour les Études d'Impacts Environnementaux (Congolese Association for EIA)	ACEIE
Central African Republic	L'Association Centrafricaine des professionnels en Évaluation Environnementale (Association for the Central African Republic for EIA)	ACAPEE
Rwanda	Association pour la Promotion des Etudes d'Impacts Environnementaux au Rwanda (Association for Promotion of EIA in Rwanda)	APEIER

## 2.3 The Evaluation

Objective of this evaluation is to offer a retrospective: Have PAANEEAC's objectives been achieved? How can this be explained? This leads to a perspective: what can the contributors and other stakeholders learn from this experience for the future? The retrospective uses the analysis levels as in Results Based Management:

1. Input to PAANEEAC (e.g. finance, time);
2. Output of PAANEEAC (e.g. activities, reports);
3. Outcome of PAANEEAC (its effects on the evolution of the national EIA systems: the legislative system and the practice of how governments take informed and participative decisions about development projects);
4. Impact of PAANEEAC: ultimate effects on 'good governance, poverty abatement and sustainable development'.

Relevant parameters at each of these levels could be derived from the original logical framework. It is summarised in the next chapter. In interviews, perceived relevance and priority of these parameters could be verified. Information about input parameters and output parameters could in addition be found in annual reports and similar documents. Assessment of outcome and impact, as well as causal linkages

between the levels, depends more on perception. Such perceptions have been observed in interviews, and in EIA mapping meetings carried out in each of five countries in 2013. Also, in October 2013 the NAs, SEEAC and the NCEA published a retrospective from the core team of PAANEEAC (Bitondo et al, 2013).

About 75 respondents have been interviewed: EIA and sectoral administrations, environmental NGOs (other than associations of EIA professionals), consultants, politicians, lawyers, at the sub-regional and international level (see appendix 5). They have been identified by the NAs and SEEAC as having knowledge about discussions going on in the development of the EIA system. The private sector has been represented by EIA consultants, hired by the project developers to undertake EIAs. Most interviews were done in one on one conversation; some were done in small groups. In all cases the interview was semi-structured, starting with open questions of a general nature.

Given the complexity of PAANEEAC and its high number of stakeholder groups, in particular the assessment of outcome and impact remains highly subjective. Evaluative statements in this report are often reflections on the perceptions respondents gave in interviews. Precise frequency of certain perceptions cannot be presented in a meaningful way because most respondents oversee only part of PAANEEAC. They each have perceptions about different components. If more than a few sources oversee a particular component, we give indications like 'unanimous', 'many' or 'some'. We indicate evaluative statements where respondents have not been unanimous. Practice of EIA is diverse between and within countries, which is why evaluative statements at PAANEEAC-level can be abstract. In such cases we look for illustrative quotes. It should be remembered that anyone with knowledge about PAANEEAC has been involved in it and is therefore likely to be biased.

This evaluation does not compare PAANEEAC's effectiveness and efficiency with possible effectiveness and efficiency of radically different ways to achieve the same impacts.

### **3. The objectives of PAANEEAC**

The NAs and SEEAC (2006) have set PAANEEAC's objectives in the document 'Project to support the development of associations for environmental assessment in Central Africa'. Associated to this document is 'Annex 1 Promotion of environmental assessment as an instrument of good governance: the action plan of the national associations. These objectives, based on a logical framework approach, have been maintained throughout programme implementation. After DGIS had accepted the initial propositions, it signed an agreement with the NCEA in October 2007. In it, the NCEA was assigned as manager of the programme on behalf of DGIS. The objectives can be split into levels of causality as follows:



**Foreseen input:**

- Small grants: base finance (seed funding of NAs) from DGIS for general functioning and activities in an accompanying programme
- Technical assistance by the NCEA
- Management by NAs, SEEAC and the NCEA
- Other input by SEEAC and NAs

**Foreseen output:**

- Activities financed by an accompanying programme
- Other output (co-)funded by base finance, such as management reports

**Foreseen outcome:**

- Envisaged outcomes are specified according to four 'specific objectives' – or kinds of outcomes – with respect to the EIA system:
  - 'Contribute to the coordination of initiatives to the strengthening of capacity, deliberation, and promotion of professional ethics and a code of ethics'
  - 'Contribute to the improvement of the legal framework, with respect to rules and organisation of EIA'
  - 'Contribute to the strengthening of the capacities of all actors in EIA'
  - 'Promote EIA as an instrument of good governance'

**Foreseen impact:**

- 'good governance, poverty abatement and sustainable development'

Hereafter we further elaborate these objectives.

Figure 1. Many respondents used sustainable forestry as an example of the potential impact of better EIA systems



Photo: Joseph Mougou

### 3.1 Foreseen input

#### 3.1.1 Small grants

PAANEEAC's base finance was composed of the following primary components:

- Base funding of general functioning of the NAs
- Accompanying programme: finance for specific activities organised by SEEAC and the NAs

The NAs and SEEAC proposed these components to the donor, DGIS. The budget was limited, the number of organisations large, the ambitions high. Therefore, the NAs and SEEAC asked for a small funding of functioning, just enough to enable a start-up period with the aim of becoming autonomous. Financial means for individual activities in the accompanying programme were also on the low side. The NAs and SEEAC aimed at using the available budget for many activities. This was seen as seed funding: just enough budget per activity to realistically enable volunteers to organise these activities. The management system was set up in such a way as to mimic the real situation that would result after the closure of PAANEEAC. The idea was that it would become easier to get used to a professional way of working that could continue autonomously after PAANEEAC.

The following PAANEEAC budget was available for the period 2008 – 2012, not comprising of the cost of technical assistance by the NCEA.

**Table 2. PAANEEAC budget (excl. technical assistance)**

Base funding	€ 580 000
Accompanying programme	€ 538 100
Administration 10%	€ 111 810
<b>Total</b>	<b>€ 1 229 910</b>

The budget for functioning of NAs was structured as follows:

- The first year the NAs received € 12 500.– to purchase basic equipment, like computers and printers;
- All subsequent years they were entitled to a maximum of € 8 500.– for the recruitment of a permanent staff and to hire an office, telephone and internet, and to pay their annual membership fee to SEEAC (€ 850).

SEEAC's office, permanent staff, etc. were financed with membership fees. Its overhead costs were limited, as it shares an office with Cameroon's NA. PAANEEAC provided € 5 000.– for international travel, plus € 20 000.– for the annual meeting of the general assembly. It was also envisaged to gain income from international conferences it would organise together with the annual meeting. However, it soon appeared that SEEAC could not afford a permanent staff on this basis. A permanent staff was believed helpful to assist in the NCEA's management task. Therefore, the NCEA made a budget for a permanent staff available from its own funding.

In order to meet PAANEEAC's objectives, the NAs and SEEAC needed to be run professionally. It was envisaged that the functioning of NAs would have to pertain to the following tasks and activities:

- Becoming officially acknowledged as NGO by the government, in order to be eligible for a bank account
- Set up an executive board composed of a chairperson, a treasurer and an executing secretary
- Set up an office with equipment and telecommunications (from PAANEEAC budget)
- Set up a system to perform the required administrative tasks (as defined by PAANEEAC)
- Hiring one permanent staff (from PAANEEAC budget)
- Organise annual general assembly meetings
- Set up a system of paid membership
- Pay membership fees to the SEEAC (from PAANEEAC budget)

- Set up and facilitate thematic commissions, regional representatives, and thematic working groups

### **3.1.2 Technical assistance (the NCEA)**

The NCEA's assistance was defined in 2007 and 2008. 200 person days (40 per year) were foreseen. Respondents at the NCEA indicate it was initially foreseen that most days would be needed for technical assistance related to the substance of EIA. This is assistance in the definition and implementation of the projects in the accompanying programme. Expectations in relation to the NCEA's competence were high. Specifically in terms of the transfer of relevant knowledge and experience with regards to the development of EIA systems around the world, and the process needed for associations of professionals to speed up the national learning process.

Decisions about scope and nature of activities were the prime responsibility of the NAs and SEEAC, within the boundaries of PAANEEAC's objectives.

### **3.1.3 Management input (NCEA, NAs and SEEAC)**

The contracts between the associations and the NCEA included management. Main management principles were:

- An even distribution of PAANEEAC-funding over NAs.
- A combination of base financing and accompanying programme, and funding at national and at sub-regional level.
- An annual cycle of planning of activities, setting a frame for financial accountability. Disbursements were conditional upon the NCEA's approval of financial reports.
- The accompanying programme was composed of a menu of activities, each with a standard fixed budget. The NAs could apply for funding from this menu depending on the specific needs in their country.
- Project proposals and budgets were to be submitted to, and approved by, the NCEA before funding would be granted.
- It was also possible to define other, yet unspecified activities, taking account of emerging country-specific urgencies within a general framework.

Later in the programme, management systems and tools of PAANEEAC have been developed in an instant, ongoing learning process. For example, prescriptions for content and approval criteria for project proposals in the accompanying programme. The general idea was that a business-like management system challenges the NAs to function as autonomous organisations.

Implementation of activities under PAANEEAC's accompanying programme included the following management tasks:

- Plan and evaluate activities in a strategic planning cycle;
- Prepare conceptual notes (project proposals) and funding requests;
- Organise and report on the activity.

The NCEA's role was to oversee programme management. Key tasks were to negotiate contracts, monitor implementation of contract conditions, and to help the NAs with reporting and general functioning.

### 3.1.4 Other input by SEEAC and NAs

Operational objectives defined by SEEAC were:

- Creation/consolidation of an adequate permanent staff;
- Assisting the NAs with their work;
- Placing the NAs activities in a coherent context of the whole international network of professionals;
- Promoting sub-regional expertise in impact assessment;
- Harmonisation of procedures and integration of transboundary issues and strategies of sub-regional interest.

To these ends, SEEAC was envisaged to coordinate and manage the PAANEEAC programme, together with the NCEA.

All NAs have, before the start of PAANEEAC, prepared their own five-year action plans with objectives called axes of intervention. These action plans were based on the diagnosis of the national EIA system made in the EIA mapping seminar. Stakeholder groups had been invited to these seminars. It would be too much to go into too much detail and summarise the individual action plans here. All action plans included at least the following axes of intervention:

- Awareness raising of target groups for the EIA system;
- Offering expertise of their members to the administrations in charge of EIA and to other stakeholders of the EIA system;
- Spreading information about EIA;
- Training of EIA professionals;
- Lobbying for specific changes of the EIA system, either in legislative framework, in guidance, or in practical organisation of institutional actors.

## 3.2 Foreseen output

### 3.2.1 Accompanying programme

The accompanying programme was divided into two groups of foreseen activities. The programme was flexible in the sense that every year a choice was made in the annual plans of SEEAC and the NAs, and that other activities could be added.

#### Activities at sub-regional level

- Organising a sub-regional start-up conference (one time only)
- Studies on (i) financing of national EIA systems and (ii) on viability and financing of NAs
- Annual general assemblies of SEEAC
- A sub-regional evaluative workshop (to evaluate performance of the network)
- Training of Trainers in EIA and SEA
- Soon after programme start, training budgets were added, for permanent staff in the professional management of NAs

#### Activities at country level

- Seminars for dialogue with stakeholders, i.e.:
  - the EIA administration
  - decision-makers
- Training sessions with respect to different aspects of EIA
- Study into the financial viability of the associations
- Workshops to evaluate national EIA systems (EIA mapping)
- Joint projects with the EIA administrations, to strengthen:
  - The legal framework
  - The national EIA documentation and information system

### 3.2.2 Other output from NAs and SEEAC

General functioning was foreseen to enable other outputs as well. This included setting up websites, lobbying activities, acquiring additional donor funds and sponsoring, etc. Finally, the management systems should generate different kinds of reports, as already indicated above.

Functioning of NAs as platforms of EIA professionals is considered as an outcome.

### 3.3 Foreseen outcome

The outcome of PAANEEAC was envisaged to contribute to the evolution of the EIA system in the participating countries and in the sub-region. Foreseen outcomes are shown in the following table.

**Table 3. Specific objectives of PAANEEAC and their envisaged outcomes**

<b>1) The EIA professionals</b>
<p>Contribute to the coordination of initiatives, to the strengthening of capacity, deliberation, and promotion of a professional ethics and a code of ethics:</p> <ul style="list-style-type: none"> <li>• A functioning framework for deliberation between professionals exists</li> <li>• The EIA professionals are well organised, adopt best practices, and observe ethical values and codes</li> <li>• The different initiatives related to strengthening of capacity are coherent and synergetic</li> </ul>
<b>2) The legal framework</b>
<p>Contribute to the improvement of the legal framework, with respect to rules and organisation of EIA:</p> <ul style="list-style-type: none"> <li>• Legal disposition of good quality exists</li> <li>• Norms and directives in support of environmental assessment are available</li> <li>• The responsibilities for management of the procedure and making of decisions are clearly assigned</li> <li>• The necessary financial resources for efficient management are secured</li> </ul>
<b>3) All actors of governance</b>
<p>Contribute to the strengthening of the capacities of all actors in EIA:</p> <ul style="list-style-type: none"> <li>• The actors have the required competences and the information to act in the EIA process</li> <li>• A system for management and coordination of data about environmental assessment exists</li> </ul>

#### 4) Governance

Promote EIA as an instrument of good governance:

- The stakeholders, that is the population, are involved in all stages of the process
- The approval criteria for EIA reports and decision making are known by all
- The stakeholders dispose of and exercise a right of appeal to the decisions made
- The deficiencies of good governance are denounced

#### Financial autonomy

The project proposal (NAs and SEEAC 2006) also included time schedules for the NAs to become financially independent of PAANEEAC during its five years' duration. This goal was chosen because every donor programme comes to an end after which the recipient has to function without it. Five years was believed to be sufficient. The financial autonomy-objective is, in the input - output - outcome - impact analysis, regarded as a specification of the foreseen outcome 'the professionals are well organised' (the second bullet at the first specific objective in the table).

### 3.4 Foreseen impact

Foreseen impact of its outcome is represented by PAANEEAC's global objective above.

In the next chapters, we describe the actual input, output, outcome and impact.

## 4. Input

### 4.1 Cost of small grants and technical assistance

The following table shows the disbursed donor subsidy and estimates of the costs made by the NCEA, which it shouldered itself. Subsidy is the same as was foreseen. The NCEA's technical staff used about 800 days, four times the time envisaged in 2008. To estimate the cost of this time, an hourly rate of € 120 is used. It includes overhead cost of the NCEA. In additions to that, the NCEA made other costs for PAANEEAC, mainly for travel and administrative consultants.



**Table 4. Cost of PAANEEAC (€)**

	2007	2008	2009	2010	2011	2012	2013	Total
A Functioning	–	166.000	69.558	66.032	73.126	79.904	<u>180.000</u>	634.620
B Accompanying pr.	25.000	15.800	115.508	87.829	63.809	72.337	<u>175.000</u>	555.283
<i>A+B (Subsidy)</i>	<i>25.000</i>	<i>181.800</i>	<i>185.066</i>	<i>153.861</i>	<i>136.935</i>	<i>152.241</i>	355.000	1.189.903
C NCEA technical Staff	19.200	48.960	116.160	196.800	73.920	128.640	<u>190.000</u>	773.680
D Other	<u>20.000</u>	<u>20.000</u>	24.005	58.560	22.171	27.349	<u>12.000</u>	184.085
<i>C+D (technical assistance)</i>	<i>19.200</i>	<i>48.960</i>	<i>140.165</i>	<i>255.360</i>	<i>96.091</i>	<i>155.989</i>	202.000	917.765
<b>PAANEEAC</b>	<b><i>44.200</i></b>	<b><i>230.760</i></b>	<b><i>325.231</i></b>	<b><i>409.221</i></b>	<b><i>233.026</i></b>	<b><i>308.230</i></b>	<b>1.114.000</b>	<b>2.107.668</b>

Note: underscored numbers are estimates. 'Other' includes mainly cost of travel of THE NCEA staff; also additional consultant hiring, hiring SEEAC permanent staff.

## 4.2 Technical assistance (NCEA)

About half of the NCEA's expert's time dedicated to PAANEEAC (as indicated above) has been spent on technical assistance (conducting training sessions, EIA Mappings, participating at seminars, etc.). This is more than originally anticipated for total input of NCEA staff to PAANEEAC.

One technical input that was particularly time consuming to the NCEA, was training of trainers. It also constitutes a relatively large part of the budget of the accompanying programme. The rationale for this choice was that it helps EIA professionals develop more ownership of capacity building in their own country. These training sessions of trainers were organised by the NCEA itself, combining several countries in a training of several days in a row, predominantly for reasons of efficiency. Usually, the trainers were one pedagogic expert, one EIA generalist (NCEA), and one EIA expert specialised in a sector of relevance to the participants. The training sessions of trainers are further explained and illustrated in a presentation (Van Boven, Biondo & Post, 2011).

## 4.3 Management

As agreed, the programme was at its basis managed by the NAs. They learned to do this over the years. The NAs carried out the management of the projects under their

national accompanying programme. They developed project proposals. Increasingly, these proposals underwent, a process of peer review in the network (among NAs). SEEAC managed projects under the sub-regional programme. SEEAC, with the NCEA, interactively produced terms of reference for the contributions of the NAs to these projects. At the end of the chain all proposals were submitted to the NCEA team, who checked conformity with management rules before payment was possible. There were some exceptions, like the EIA Mappings, where for practical reasons the NCEA managed the project..

In the course of PAANEEAC's implementation, the NCEA refined its own role with respect to programme management. Programme management soon appeared to be more than administration: a need appeared for coaching the NAs with respect to their general management and administration.

After having initially outsourced administration and management with mixed results, the NCEA started spending more time on this task. This brought the administrative checks closer to the NCEA's team. By 2010, the NCEA spent about as much of its PAANEEAC-related time on coaching as it did on technical assistance. The two part-time technical EIA staff were supplemented with a part-time consultant working as part of the team; a pedagogic expert in training of trainers. She also assumed administrative management tasks.

The NCEA has:

- Reviewed the annual work plans and annual budgets of the NAs;
- Analysed the project proposals and additional requirements for funding;
- Reviewed the financial accounts (including invoices) twice a year;
- Analysed financial and narrative reports at the national and sub-regional level, produced by the NAs and SEEAC.

Through its management, the NCEA tried to stimulate self-organisation of the network of professionals. It advised the NAs and SEEAC about issues like:

- The internal communication of the network;
- The system of membership fees;
- Management fees in case members acquired consultancy projects with the help of their association.

The coaching was carried out in face-to-face meetings, and by telecommunication. It was combined with visits in the regular programme (annual meetings, programme activities). The NCEA dedicated annual monitoring visits to this goal. Whenever the NCEA attended network meetings like for instance general assemblies, it was only in the role of observer and if necessary to answer questions. Sometimes it also explained the possibilities. One example, for instance is that within PAANEEAC's general objectives, the budget for the accompanying programme was also available for projects other than those on the original list.

Respondents in all NAs have appreciated this role and expressed their gratitude in interviews. Even if they were not in the region, the NCEA was always available by telephone, Skype and email.

Towards the end of PAANEEAC, the issue of financial autonomy for the NAs and SEEAC became more and more pressing. Coaching and training sessions in mobilisation of funds were added. The NCEA looked for additional ways to stimulate initiative. In the last year of PAANEEAC the NCEA offered the NAs an extra 1/3 of annual base funding from PAANEEAC's remaining budget. The condition: they would need to bring up 2/3 by themselves. This was seen as an incentive to look for ways of becoming financially independent. In the last general assembly of SEEAC during PAANEEAC (in October 2013), NAs extensively shared experiences about becoming financially independent.

Figure 2. One of many training sessions on financial administration



#### 4.4 Other input by SEEAC and NAs

The NAs and SEEAC delivered their input in terms of time dedicated to the agreed tasks. Its intensity increased over time. NAs estimate that their members, in the end, spent approximately ten voluntary person-years per year (this is an extrapolation based on an indicative estimate of Burundi, CAR and Congo). With this effort, the following inputs were generated:

- At the end of 2008, most NAs had a bank account. In Rwanda, it took a year longer. The signature of the contracts had been delayed because it took a while to apply for and become officially recognised by the government. Slow administrative procedures were partly responsible.

- After being registered and obtaining a bank account where needed, the associations started to operate in accordance with the agreed rules of PAANEEAC. Their experience with professional management was limited, and the enthusiasm of volunteers grew only slowly. It took quite a few years to get everything in place and to start implementing PAANEEAC projects at full speed. Practical things like managing websites and information bulletins have remained difficult until the end, although significant steps have been made. Often, the technical means were lacking.
- The performance in terms of the planning and accountancy cycle had been boosted by a training session, the NCEA gave to permanent staff members in 2008. After several staff members had found other jobs this was repeated with their successors in 2011 and 2012. All permanent staff were coached individually every year.
- The functioning of most NAs gained its momentum at the end of 2009. Only then, the office, staff and physical equipment were in place and functioning as planned. The internal organisation was structured, the positions of executive board and commissions filled. This enabled a technical focus in 2010, 2011 and 2012.
- Over the years, the staff and executive members of different NAs and SEEAC came to know each other better. They often helped one another with tasks such as preparing the proposals for fundable activities ('notes conceptuelles'). The permanent staff members are seen to have a crucial role in the functioning of the NAs and their network. Respondents indicate that without paid permanent staff these organisations would not nearly have been able to perform as they finally did.
- After five years of operation in 2012, PAANEEAC had not yet been completed. This was due to its slow start. Enough budget remained to prolong the programme by one year, 2013. That last year was full of activities and the network was said to be performing as never before. The internal communication system was functioning. They had many activities, not only those financially supported by PAANEEAC, but sometimes by other sponsors.

The international conferences at sub-regional level were planned together with the SEEAC general assembly meetings. These give an indication of how NAs' input improved over the years. Especially the ones in 2010, 2011 and 2012, in Congo, Burundi and the Central African Republic, drew the attention of the press and politicians. The conferences have become increasingly professional and increasingly generated fees and sponsoring. Another indicator is formed by the annual reports and annual plans. Only in the last year or two, these all have been satisfactory in the eyes of the NCEA, some were even of good quality. In other years, it took more effort to coach the NAs.

SEEAC's input played a crucial role in enabling the NAs to deliver their inputs. It has delivered its input largely as foreseen. NAs and SEEAC both also delivered the required input to the technical activities under the accompanying programme (these

activities are described in the next chapter as outputs). Their total voluntary time dedicated to PAANEEAC has increased significantly over time.

In short, PAANEEAC needed not only a long preparation time, but after its initial start, another 3 – 5 years were needed to gain momentum. International respondents, active at pan-African level, suggest that PAANEEAC, looked at from some distance, is one-of-a-kind in Africa. Experience with similar programmes in single countries has taught that such associations require 8 – 10 years of maturation in a protected environment.

Figure 3. The office of the Congolese NA



## 5. Output

This evaluation evaluates Dutch development assistance through PAANEEAC. As indicated, at the start of PAANEEAC a framework has been agreed between DGIS/NCEA and the NAs. This framework, including the coaching by NCEA, is considered as the Dutch input. The way the NAs have implemented PAANEEAC within the agreed framework is output.

The accompanying programme has been implemented with a slow start and a fast finish. Some activities have not been carried out, because others were seen as more important. Additional activities have been carried out without being on the original list. At the general assembly meeting of SEEAC in 2012, the NAs proposed to use some of the remaining budget for additional purposes. At the end of the programme, more budget than foreseen has been spent on training of trainers, among other activities. Respondents indicate that this flexibility has helped to make PAANEEAC goal oriented, allowing adjustment according to needs. Outputs were

also general meetings and management reports, as well as smaller activities. These were financed from the budget for general functioning.

## 5.1 Accompanying programme

### 5.1.1 National level

The national activities co-financed under the accompanying programme are shown in the following table. They have been proposed and organised by the NAs.

**Table 5. Implementation of national projects under the accompanying programme**

Activities	2009	2010	2011	2012	2013
Seminars		X	X	X	
EIA mapping					X
Training session		X	X	X	X
Joint projects with EIA administrations				X	X

Explanation of the activities in the table:

**Seminars** were aimed at organising national dialogue among professionals on the the subjects of general process, on topics like ‘evaluation of EIA reports’ and ‘monitoring and enforcement of regulations’. In the latter example, the national enforcement authorities and a Dutch inspector were invited. All NAs have organised such seminars. Available per seminar: € 1 250 (seminar aimed at decision-makers: € 1 350).

The NCEA developed **EIA mapping** to enable a custom approach to PAANEEAC countries. This tool aims at joint review of the EIA system among sectors of government, NGOs, consultancies and scientists. Seminars take 2 days. To determine required action, analysed data were presented in a second feedback seminar. Mappings were facilitated by the NCEA and SEEAC. The EIA administrations own the results. EIA Mappings were carried out in the preparation before PAANEEAC and again in 2013, observing the evolution of the EIA systems (Bitondo, Post & Van Boven, 2013). It has had a profound impact. Many respondents refer to mappings as a key source of their inspiration. In 2006 they inspired the five-year plans and in 2013 it inspired a new agenda. The number of participants was up to a maximum of 40 and always

more than 20. Available per mapping: € 1 375. The NCEA's key sheet about EIA mapping – appendix 2, available at [www.eia.nl](http://www.eia.nl).

**Training sessions** focused on transfer of knowledge, by those teams of trainers who had been trained in the programme (see next section 5.1.2. Training of Trainers). National training activities focused on elements of environmental assessment, like national EIA systems, scoping, review, enforcement, reporting. The average number of participants was around 25. Available per training: € 1 375 (EIA systems training: € 1 250).

**Joint projects with EIA Administrations** aimed at direct improvements of the EIA system. EIA authorities and NAs submitted joint proposals. Two project types had been defined in advance: improvements to the legal framework, and improvement of the national systems of EIA documentation and information. Most NAs needed several years to build up a relationship with the EIA authorities before joint projects became possible. Joint projects took the form of preparations of legal texts and data bases, and first steps toward their implementation. The available budgets were somewhat higher than that of other projects, in order not to have to depend exclusively on volunteers: € 9 375 per country. Respondents at EIA administrations highly appreciate these projects. None of the projects has yet been finished.

### 5.1.2 Sub-regional activities

The sub-regional activities co-financed under the accompanying programme are shown in the following table. They have been proposed and organised by the NAs, SEEAC and the NCEA.

Table 6. Implementation of sub-regional projects under the accompanying programme

Activities	2008	2009	2010	2011	2012	2013
Annual Meetings	X	X	X	X	X	X
Studies coordinated by the NCEA (financing of EIA systems; environmental norms)				X	X	X
Training of trainers coordinated by the NCEA			X			X
Other training sessions (permanent staff, on financing of NAs)			X	X	X	X
Other activities (see hereafter)						X

Explanation of the activities in the table:

**Annual meetings** at sub-regional level were in the first place general assembly meetings, required by the SEEAC charter. As of 2009 an international conference was coupled to each annual assembly (see the table). There, participants often decided to become members of the NA in their country. Each time € 20.000 was available (for the closing meeting it was a bit more), and travel cost of two persons per country were paid from PAANEEAC budget, one representative in charge of each association and one official from each EIA administration. Conclusions were well documented in SEEAC's annual reports. The conferences were experienced as places for networking and exploring possibilities in an informal setting. They were organised under the auspices of the national environmental administration of the host country. Each year the gathering drew increasing attention from media, high officials and politicians in the host country. Number of participants was mostly 80 or more.



**Table 7. General assembly meetings and themes of the associated international conferences**

2008: Douala, Cameroon: the first general assembly, no international conference yet
2009: Kigali, Rwanda: 'Environmental evaluation and energy and mining issues in Central Africa'.
2010: Brazzaville, Congo: 'environmental evaluation and good governance in Central Africa' under patronage of Commission of Forests in Central Africa (COMIFAC) (80 participants).
2011: Bujumbura, Burundi: 'Environmental evaluation and sustainable management of land in Central Africa' (This meeting was larger with several sponsors).
2012: Bangui, Central African Republic: 'State of affairs of environmental evaluation in Central Africa'.
2013: Douala, Cameroon: this was a closing meeting for PAANEEAC as a whole, taking stock of PAANEEAC and looking to the future. A slightly higher budget was available to enable travel of 1 extra person per country.

The **studies** done in PAANEEAC related to more difficult issues where the NAs needed ideas from outside. The first topic (€ 9 725) was 'How well developed are the national systems of environmental norms and standards in these countries, compared with international standards'? This study was carried out in 2011, and concluded that the legal national basis is usually weak or absent. According to respondents this study has set in motion processes of awareness raising and improvement at the national level. Generally, these countries unofficially apply norms used by international organisations such as the World Bank. The second study (€ 30 000) was 'How can national EIA systems be financed'? Few systematic international research was available on this topic. The study on finance (the NCEA, 2013) was ongoing in 2013 and its outcome cannot be evaluated in this report. Clearly, however, respondents identified the mechanism of financing administrative tasks in EIA as one of the key challenges.

**Training of trainers** was intended to develop national technical training capacity. This should reduce the cost of training sessions at national level and achieve a multiplier effect. Five national trainers on EIA per country were trained in 2010 by a training expert, the NCEA technical staff and a technical resource person. In 2013, a smaller refresher version was organised. Expected leverage was high. Budgets were also relatively high (although at first underestimated). For example, a realistic budget of one full 'train the trainers' seminar cycle for three countries appeared to be € 65 000. Training sessions included a strong focus on didactic skills as well, with a specialised trainer. In general, these training sessions have been highly ap-

preciated and provoked discussion about the future of EIA at national level. At national level, these groups have organised pilot training sessions, where the NCEA was present as coach. The NCEA coaching activities – also from The Netherlands by telephone and email – were appreciated. At the end of the day success is mixed: in Cameroon, Rwanda and Burundi trainers have organised national training sessions. In the other countries, they did too, but to a much lesser extent because the trainers proved little available (for example, they have other jobs).

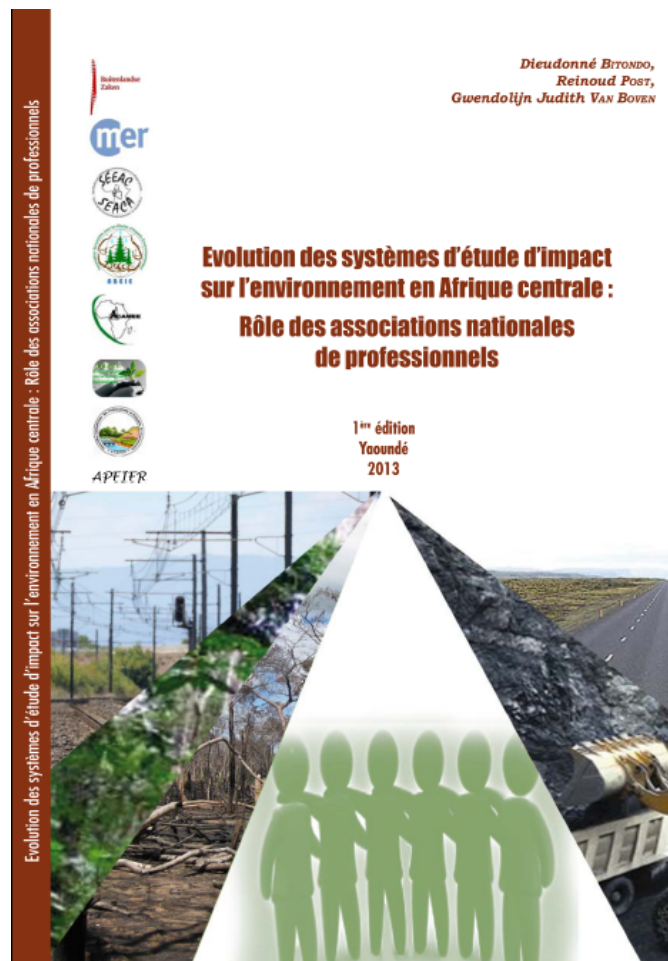
The **training sessions** at sub-regional level were aimed at professionalisation of management skills of permanent staff, and at skills of acquiring funds for not-for-profit organisations:

- Training of **permanent staff** is seen as crucial. Not all of these staff members had experience with management and bookkeeping. They should run the administrative systems of their organisations professionally, so that NAs are attractive to members as well as to donors. The first training took place at the Douala conference in 2008. It was aimed at (paid) permanent staff and (voluntary) treasurers. They were trained in financial management by Dutch consultants (ITC) and in communication and event management by the NCEA. In 2011, 2012 and 2013 the permanent staff of the NAs was again enabled to travel to the annual meeting. There, the NCEA offered additional financial administrative training.
- Training in the **mobilisation of funds** was done twice, in very different ways (1<sup>st</sup>: € 40 000; 2<sup>nd</sup>: € 35 000). An African consultant and one from the NCEA have been trainer. The participants are now developing action plans.

In 2013, the NAs requested funding for several **other** activities that had not been identified before:

- Training of media (€ 30.000). This was added to the programme in 2013 because the NAs realised that improvement of national EIA systems and governance depends on political will, which again may profit from a critical press.
- Development of publication material, like banners, to be used at conferences.
- Printing a joint publication, bringing together the experiences the NAs and SEEAC had with PAANEEAC. It was presented at the closing meeting.
- In Cameroon only, an extra seminar was organised on law enforcement. All others preferred to have a refresher course Training of Trainers.

Figure 4. Cover of the joint publication



## 5.2 Other output from NAs and SEEAC

Management output includes contracts, annual work plans, annual reports, financial reports, project proposals, project reports, and strategic orientation documents. The NAs and SEEAC together produced hundreds of such documents. Appendix 1 gives more details about PAANEEAC's management system and reports.

The following table summarises miscellaneous additional outputs since 2008, not including management reports, and also not earmarked in the accompanying programme.

**Table 8. Some of SEEAC's other activities since 2008**

Activities in italics have been financially facilitated by PAANEEAC. The list gives an idea of the type of activities; it is an example and far from complete.

<p><b>Continuous activities, started in 2008/2009</b></p> <p><i>Providing information related to opportunities to the NAs</i></p> <p><i>Establishing communication systems: newsletter, website:</i> www.seaonline.org; www.acameeonline.org/ )</p> <p>Setting up a database of international (primarily African) experts on EIA and governance (www.encapafrika.org)</p> <p><i>Setting up and improving relations with NAs in Equatorial Guinea, Chad, de Sao Tomé et Príncipe, Gabon and Democratic Republic of Congo</i></p> <p><i>Lobbying for international harmonisation of EIA procedures and transboundary issues of governance</i></p> <p><i>Contributing to the operationalisation of an international network of EIA authorities in the sub-region, under the name RACEEAC (Réseau des Administrations en Charge de l'Evaluation Environnementale d'Afrique Centrale)</i></p> <p><i>Seeking collaboration with general sub-regional governmental organisations (CEEAC-ECCA, CEMAC...) and international organisations aimed at EIA and governance (CLEEA, le SIFEE, IAIA, COMIFAC, CEAC, CEMAC, WWF, etc.)</i></p>
<p><b>Activities in 2008</b></p> <p>Participation, with 6 NAs, in a seminar on impact assessment of armed conflict in Kinshasa (financed by CLEEA from its revolving fund)</p>
<p><b>Activities in 2009</b></p> <p>Training and setting up of EIA consultancies in Gabon, Congo Brazzaville and Cameroon</p> <p>Contributions to a seminar on environmental management and sustainable development</p>
<p><b>Activities in 2010</b></p> <p>Realisation of a capacity building project on EIA and mining, with support from IUCN Netherlands and the NCEA</p> <p>Organisation of summer schools and colloquia on environmental assessment</p>

(300 participants), on behalf of SIFEE, the IAIA for French speaking countries

*Signing of partnership agreements with COMIFAC (Commission des forêts d'Afrique centrale) and REPAR-CEFDHAC (Réseau des Parlementaires pour la Gestion Durable des Ecosystèmes Forestiers d'Afrique Centrale)*

Elaboration of a legal manual on EIA to serve as reference for individual countries in Central Africa

Elaboration of a report in the legal and institutional state of affairs on environmental assessment in Central Africa, supported by CLEEA

#### **Activities in 2012**

*Adaptation of SEEAC internal statutory legislation.*

*Formulation of a summary document of training needs assessment in the NAs*

Facilitating the participation of young professionals in occupational training

,In cooperation with REPAR-CEFDHAC, organisation of a seminar on the legislative stakes with respect to environmental assessment in a transboundary context

#### **Activities in 2013**

*Contributions to a COMIFAC project to develop a sub-regional Directive on EIA.*

## **6. Outcome**

Hereafter we summarise what respondents have said about the foreseen outcomes.

### **6.1 Platform function for EIA professionals**

The original foreseen outcome was: 'a functioning framework for deliberation between professionals exists' (relating to EIA professionals).

Respondents overwhelmingly agree that PAANEEAC has succeeded at this point. There has been free debate between representatives of most actors groups in the EIA process. In particular EIA administrations and sectoral ministries are intensely participating in the NA's activities. National and sub-regional platforms reinforced one another, with the annual general assemblies and international seminars of SEEAC as key events. Respondents agree that this dialogue has occurred among

potentially influential professionals and with the intention to contribute to other outcomes, and therefore it has been constructive. Respondents generally believe that these platforms have been influential, having impact on legislation and practice of EIA and governance. On the other hand it remains difficult for them to assess which factors have contributed the most.

Figure 5. An EIA mapping workshop



### 6.1.1 National level

At national level, the platform function can be demonstrated by means of the number of EIA professionals, the diversity of their backgrounds, and their management level.

- Number: in each country, anywhere between dozens and hundreds of professionals have become member of the NA. Many more have participated in activities.
- Diversity: individuals active in national authorities in many sectors and international organisations have participated. The EIA administrations, many sectoral administrations, individual consultants, and scientists are always represented. Sometimes other groups participate on a less regular basis; for example general lawyers.
- Management level: in Congo for example, the vice president of the NA is also director general of environment. In CAR, the president of the NA has become minister. In Cameroon, the president is a member of Parliament.

There are important differences between countries: The environmental consultancies are underrepresented in the NAs of Congo and in Rwanda. Environmental NGOs are largely underrepresented. Environmental NGOs generally have a mission to protect environment and nature rather than to improve the EIA system; yet, they would benefit from a well-functioning EIA system, and could actively make use of it. Some of their staff may develop to become EIA professionals, but as yet such professionals hardly participate in the NAs.

In several countries, environmental inspections or decentralised administrations are underrepresented. Yet in each country respondents say the NA has inspired them to action at the level of legislation and organisation or practice of EIA. The role of large commercial investors is still a blind spot. They make funding available to undertake EIA as legislation requires, but they do not seem to be connected to the NAs as platform for proactive debate about the EIA system.

Evolution of membership is shown in the following table.

**Table 9. Evolution of membership of NAs**

Country	Members in 2008	Members in 2013	Of whom paying membership fees 2013
Burundi	8	45	16
Cameroon	40	250	50
Congo	50	60	60
CAR	0	52	10
Rwanda	0	40	10

Source: NAs

### **Leadership**

Respondents indicate that in their country their NA is the only organisation capable of organising a platform for equal deliberation about EIA and governance. They indicate that it depends on leadership, since it must bridge the gaps between members from public, private, civil and academic backgrounds. In each NA there were informal leaders able to achieve this. In Burundi, Cameroon and CAR, the academics have kicked off the process, in Congo, former civil servants, or civil servants in unofficial capacity. In Rwanda an NGO and two consultants took most initiatives in the early period. In all cases, respondents indicate that the personality of the president and the executive secretary has played a crucial role.

The following quotes are illustrative:

- ‘Our NA serves as platform to discuss the governance of large projects. It has become like this since about a year, when our government started to participate. The civil servants start asking us to take the lead in discussions. Before, the administration developed their systems without a lot of deliberation. A factor has been the change in our board. Another, the lack of consensus within the government.’ (An NA member in Rwanda)
- ‘Since we formally started as association in 2008, we have now 45 members. They work in sectoral ministries, other organisations of civil society, consultancy and science. All participate on personal behalf.’ (An NA member in Burundi)
- ‘We are said to be a platform that accelerates important improvements in the EIA system. We have contributed to an awareness of its importance from a point of view of good governance. Our first seminar has led to a shared and deeply felt ambition to make EIA relevant. Our seminars, which we always organise together with the EIA administration, are visited each time by between 20 and 35 participants.’ (A leading NA member in Burundi)

### Activities

All NAs had a similar repertoire of tools to organise platform meetings with impact. Respondents refer to PAANEEAC-supported activities they had participated in, like seminars and training sessions. One specific activity that many respondents referred to after open questioning was EIA mapping. The following quotes are each illustrative for what was said in most countries:

- ‘Our NA is a partner of the ministry of environment, as it is to other players. This has contributed to a general awareness that enabled us to survive the recent change of political leadership. Our chances have even improved.’ (An active NA member in CAR)
- ‘This EIA mapping has led to awareness among the right people that through gradual creation of transparent systems, it is possible to abate corruption and increase the quality of governance. Things may move fast now in this country’. (The moderator of this meeting, talking about Congo)
- ‘The international conference we organised with SEEAC has attracted high-level attention. It has been a boost to our process, nationally as well as internationally.’ (An active NA member, civil servant from Congo)
- ‘We have seen how actors in other countries operated, and we have drawn lessons for ourselves as a ministry’ (An active NA member, civil servant)
- ‘We are a highly politicised country. Our NA, as a neutral platform, has enabled us to take decisions based on trusted apolitical knowledge. I am an optimist; members are led by their shared ambition.’ (civil servant, Congo)
- ‘Our NA is a permanent sentinel. In a forum discussion between government and parliament with civil society, the weakness of mining and forestry con-



On the other hand:

- 'Our impact could be larger if we could organise activities in other parts of the country, not just in the capital. Most economic activities and their stakeholders are located elsewhere. Travel cost is a true impediment.' (Several NA members in Congo)

### 6.1.2 International level

PAANEEAC has enabled dialogue at sub-regional level. PAANEEAC initiators believed from the start that synergy between networks of EIA professionals at the national and sub-regional level may be reinforced if also EIA administrations were to join up at sub-regional level. They always invited EIA administrations to SEEAC's annual meetings. PAANEEAC shouldered their participation. The EIA administrations of most PAANEEAC countries (including Rwanda, which does not participate in CEEAC) have developed stronger relations with the help of PAANEEAC. At the PAANEEAC international conference in Bangui, November 2012, the economic community of Central African states, CEEAC-ECCA, expressed an interest in hosting a network of EIA administrations. This network is believed to be potentially effective in harmonisation of EIA systems, with a view to development projects with transboundary effects, and to enhance a level playing field for investors. CEEAC will establish a budget line to this end in 2014, and in 2013 PAANEEAC supported preparations.

There have been other initiatives. For example, the 2012 annual report of SEEAC indicates that SEEAC was invited to become member of the network of parliamentarians CEFDHAC. SEEAC also supported an initiative to develop an instrument inspired by the UNECE Convention on transboundary environmental assessment (ESPOO convention).

There is some synergy with the work of international development banks, as these promote EIA and SEA in the preparation of their loans. The World Bank also participates in CLEEA.

Quotes:

- 'The COMIFAC, the ministers of forestry and environment, have asked the SEEAC and its network of NAs to participate in a study that should lead to a guiding directive (directive d'orientation) for central African States to harmonise their EIA legislation. It is a pity that SEEAC still doesn't have a legal structure allowing us to pay them.' (A worker at COMIFAC)

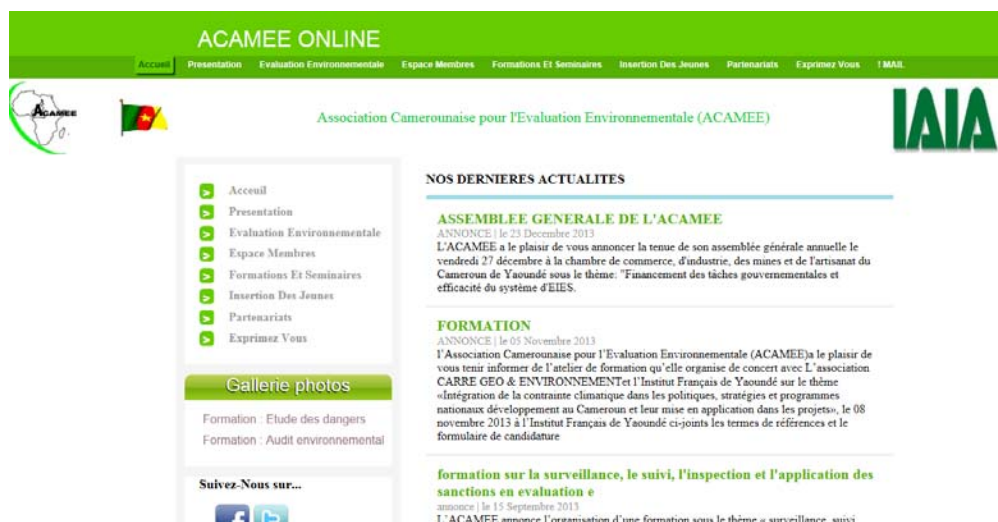
- ‘The training sessions and joint studies that are organised at sub-regional level are highly inspiring since you can see how other countries approach similar challenges. It leads to intensified contact with our neighbors.’ (NA members from several countries)

## 6.2 Capacity of EIA professionals

The original foreseen outcome was: ‘The EIA professionals are well organised, adopt best practices, and observe ethical values and codes’.

As regards ‘**The EIA professionals are well-organised**’, respondents who have been involved in the NAs’ activities widely agree that significant progress has been made. All five countries now have professional associations that function as influential platform, have paying members, unite most domains, have statutory rules, a planning cycle, a working financial accounting system, an executive board, office space with key functions. They are capable of organising events and apply donor rules. Several have a website. They use different systems for generating finance; membership fees, paid training sessions and other activities, sponsoring. The NA of Cameroon has ‘antennas’ in about 20 ministries and several provinces. Yet, respondents are not yet satisfied. Important groups are not connected as indicated in the previous section. However, respondents do not refer to the complete absence of private investors, which suggests that they see few opportunities there. Internal communication systems sometimes work do not work well.

Figure 6. Website of the NA in Cameroon (<http://www.acameeonline.org/>)



The foreseen outcome ‘EIA professionals are well organised’ implies another outcome: **financial autonomy** of the NAs and SEAC from PAANEEAC. Virtually all respondents closely involved in the NAs say that this objective has failed. The NAs

have not yet found sufficient alternative structural resources to replace PAANEEAC's base funding for general functioning, let alone its accompanying programme. The NCEA staff believes that in Cameroon, Burundi, and perhaps also in Rwanda, a year continuation at present level of performance may be secure for the moment. For SEEAC two years continuity may be secure, making it less dependent on membership fees.

Some steps have been made:

- A rising number of members are paying their membership fees. In Congo, for example, this is just enough to pay office space and electricity;
- It has become more or less accepted that members who acquire consultancy contracts with the help of their NA compensate this effort with a management fee;
- Sponsors have supported some activities (Burundi and SEEAC);
- The NAs are preparing themselves to organise EIA training sessions and recover cost by asking fees.

In CAR, the NA has raised its own income to 10% of total expenses, so 90% is still paid from PAANEEAC. Some NAs (Burundi, Cameroon and Rwanda) have been able to reserve a part of their income additional to PAANEEAC for the future (enabling them to pay the office rent for up to a year approximately). But these associations are run by volunteers, and it is said to be difficult to develop a business-like culture.

The NAs do not want to put their credibility as neutral, not-for-profit organisation at risk. It is needed for an effective lobby and platform function. Therefore, they cannot carry out EIAs for example, as that would involve them directly in projects. It would also drive them into competition with their own members, as that would impair the platform function.

All respondents believe their NA will continue to exist and perform at some level. They refer to the enthusiasm of their members, their effectiveness as lobbyists, and their management systems.

NAs will remain structurally dependent on donors. The NCEA staff believes that they have the potential to manage donor funds now, without continued coaching by the NCEA. The NCEA staff, as their management coach, assesses that the executive board and permanent staff of the NAs can help each other enough to satisfy donors' needs for transparent bookkeeping. In 2013 all NAs participated in PAANEEAC's training sessions about acquiring funding from international donors, and perhaps also from their environment ministries.

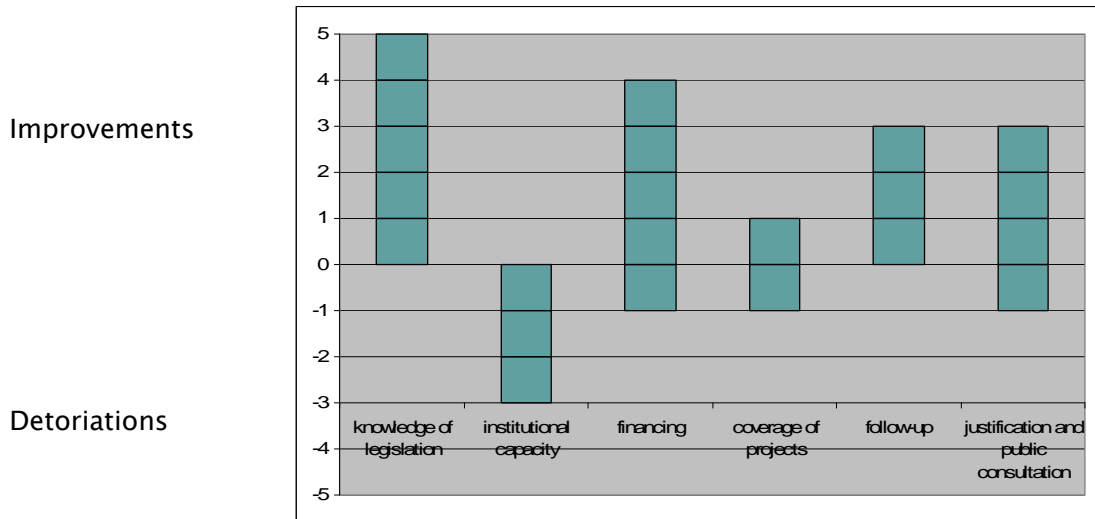
As regards the outcome '**The professionals use best practices**', observations are similar. Progress has been made but much more is still needed. Practice of EIA is less developed in EIAs where government itself is the developer of a project, as

compared to private investors. There are often limited possibilities to demand environmental measures due to an absence of enforceable legal standards. Respondents see the solution often as a challenge of education and training of professionals. Some statements by leading members of NAs give an indication of how they reflect on EIA practice:

- Burundi: 'Practices are at a low level but clearly improving. Organisational capacities are limited.'
- Cameroon: 'Especially the quality of EIA consultancies has improved. Next challenge is the quality of mitigation plans and their enforcement in specific sectors and technologies.'
- Congo: 'We think review of EIAs on the basis of a-political and integral knowledge has significantly improved. Participation of the NA in inter-ministerial committees contributes to this.'
- CAR: 'Level of practice is low due to limited number of investment and unclear EIA requirements. Only about five to ten good EIAs per year are produced.'
- Rwanda: 'Major efforts have been made to produce sectoral guidance. However, the system depends on quality review by only five civil servants.'

The following table shows how groups of professionals have evaluated their EIA practice in the EIA Mappings carried out in 2013 compared with those done in 2006. Only in the case of the parameter 'solidity of finance of the EIA system' and 'quality of legal texts', both data are available from 2006 as well as 2013, which is why the other parameters have fewer blocks (each block indicates a country). Professionals explain the deterioration of publicity given to the procedures as caused by increased understanding and increased awareness of needs, leading to higher ambitions and therefore to a more critical assessment. Performance is then assessed at a lower level.

**Table 10. Number of PAANEEAC countries where professionals saw improvements and deteriorations of EIA practice between 2006 and 2013**



Source: EIA Mappings; only counting countries with a significant change (further explanation: see appendix 4)

**Quotes:**

- ‘Our inter-ministerial committees are apolitical in their work and guided by international norms and standards. Occasionally, they demand developers to come to them and explain their initiative, or the committees visit the sites. However, as a rule there is no funding for site visits.’ (Servants in different ministries of Congo)
- ‘As NA member and journalist I was able to mobilise the press to take part in a three day seminar about EIA. Sixteen participated. They look for opportunities now to bring EIA under the attention of their readers.’ (A journalist in CAR)

As regards ‘**The professionals observe ethical values and codes**’, little has improved. Some respondents expect a lot from responsible behaviour by – primarily – EIA consultants. At the start of PAANEEAC it was envisaged to discuss ethical codes and perhaps organise an ‘order’ of consultancies. Ethics sometimes have been discussed in the NAs, but no codes or orders have been established. In most of these countries EIA consultancies must be certified by the EIA administration. A possible ‘order’ should relate to the certification system: who would be responsible for expelling members who do not uphold the code? Only in Rwanda the EIA administration prepares legislation. Thus far, it has not consulted the Rwandese NA.

**Quotes:**

- ‘Consultancies and others have frequently discussed, in our meetings, a variety of important aspects of EIA and governance. Discussions of practices of

public consultation, where the law does not specify how it should be done, have at times been critical.’ (A consultant in Cameroon)

- ‘Real dilemmas, that may create tension between ministries representing for example the economic interest and the social interest, do not occur in our inter-ministerial committees. They are in harmony.’ (Respondents from several backgrounds in several countries)

### 6.3 Capacity building

The original foreseen outcome was: ‘The different initiatives related to strengthening of capacity are coherent and synergetic’.

Have initiatives related to strengthening of capacity been coherent and synergetic? All respondents say that this has improved greatly. PAANEEAC as a whole was geared to creating exchange and synergy between activities. Training sessions are seen as highly successful and useful. Combining participants from different countries in sub-regional training sessions (such as train-the-trainers) has been appreciated.

The NAs and SEEAC have attuned their annual plans, and in 2013 they are planning their own training activities to be implemented after PAANEEAC. Each NA has several trainers who already trained national professionals with subsidy from PAANEEAC since 2010/2011. In 2013 they are all looking for ways to continue training activities in a budget-neutral manner. In particular in Cameroon, Burundi and Rwanda, trainers who have been educated in PAANEEAC try organising their own training sessions without PAANEEAC subsidy.

PAANEEAC focused primarily on occupational training sessions of EIA professionals. Many respondents indicated that this is not sufficient: a younger generation needs to be educated at an earlier stage, for instance at school and at university. The synergy between practical occupational training sessions and academic education is not always well organised. This seems better in countries where university professors have leading roles in the NAs (Cameroon, Burundi, CAR). In particular SEEAC has tried to make agreements with universities to deliver candidates for training of trainers and to build EIA into their curricula.

Quotes:

- ‘The training sessions in which I have participated were really aimed at practice. There is no other way in my country to receive such training. I believe there is a market for this we could jump into.’
- ‘The training sessions are our core business. We have now trained eight trainers, with a focus on the governance and transparency side of EIA. We also have been able to put together a pool of experts with specific technical expertise. We start by training our own members. After that, we offer our-

Figure 7. A scene from a PAANEEAC training

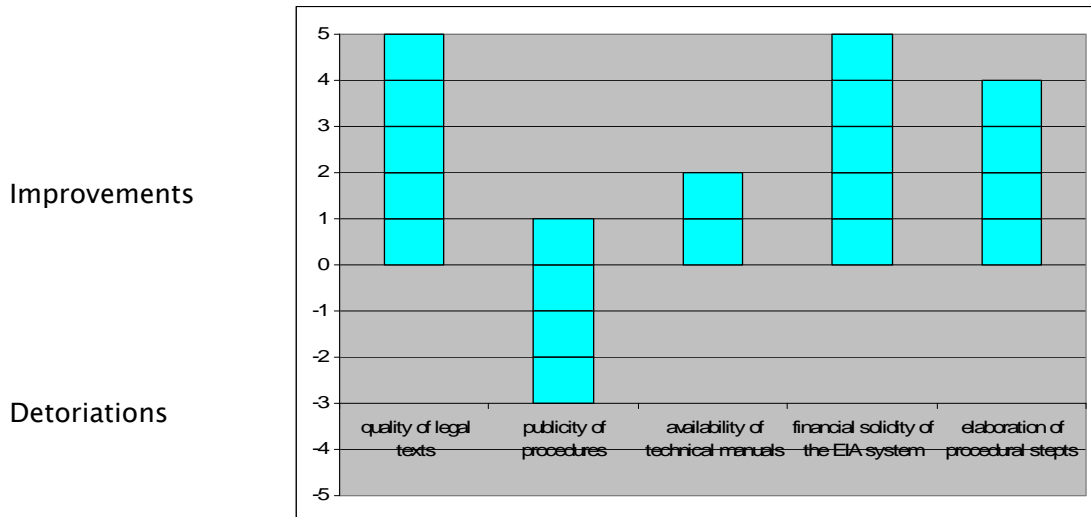


## 6.4 Legislation

The original foreseen outcome was: 'Legal dispositions of good quality exist'.

In all five countries, major legislative steps have been made during the PAANEEAC period, as the following diagram shows. Professionals indicate in several countries that large stakeholder groups need to be informed now the laws have improved. This partly explains why they have indicated deterioration along the axis 'publicity of procedures' in three countries: the degree to which procedures must be published . They also have become more ambitious than in 2006 with respect to public nature of the procedure.

**Table 11. Number of PAANEEAC countries where professionals saw improvements and deteriorations of EIA legislation between 2006 and 2013**



Source: EIA Mappings; only counting countries with a significant change (see appendix 4 for explanation)

It is difficult to agree on an appropriate level of ambition for ‘legal dispositions of good quality’. Respondents seem to agree that it should focus on all ‘collateral’ impacts of economic initiatives – that is, all impacts that are not explicitly intended by the developer. Many refer to the full chain of regulative procedures the government may use to influence economic development in a public process: from assessment and participation before issuing development permits at the level of policies, plans and programmes (SEA) and projects (EIA) to enforcement of general and project-specific permit conditions. Auditing is seen as such an enforcement for existing activities, whether these have been subject to an EIA or not. In all links in the chain, the public may be involved and government should be accountable for its decisions. In general, respondents are well aware that all these public procedures require close cooperation between ministries, so that Cabinet can take one position from all points of view. The implementation of EIA at national level is already difficult. In some countries responsibilities are being decentralised and local authorities are put in charge. The implementation challenges are enormous.

Are ambitious laws useful if implementation follows with major delays? Several respondents think it is more important to focus on legislation than on practice (‘without requirements no practice’). But not always: In CAR, practice goes ahead of legislation. This is not intentional, but it shows that a lack of legislation does not necessarily foreclose the existence of a practice. In the other countries, most respondents think that legislation is not the bottleneck for a better practice to emerge. The following table shows major recent developments in legal EIA systems. Many respondents believe that, except in Rwanda perhaps, the NAs and PAANEEAC have contributed to these changes.



Table 12. Major developments in legal dispositions for EIA

	Issued	Almost issued	Under way
Burundi	EIA (except certain legal technicalities)	None	Audit, SEA, and Technical Improvements of EIA
Cameroon	ESIA*; Audit; SEA (decentralised)	None	Adapt texts to liable project categories
Congo	ESIA*	Manual of Administrative Procedures and Techniques	Decentralisation, Audit, SEA, Inspection
CAR	None (The Environmental Act introduces EIA but it is not concrete)	Decrees on ESIA*, SEA, Audit, public consultation	Update of Environmental Act, Inspection
Rwanda	ESIA*, Audit	SEA	Order of EIA consultancies

\*ESIA stands for Environmental and Social Assessment (French: Etude d'Impact Environnemental et Social).

Quotes:

- 'Our influence has become larger after the latest change of government. Thanks to that, our prime minister is now aware that EIA is a general requisite to sound governance of investments. Before, there was a problem of connecting with the highest level of government. There was a great gap in their knowledge about needs and desires of international banks and large investors. EIA is now increasingly thought of as a tool to increase transparency and reduce corruption. The NA has played a role in the networks that have achieved such awareness.' (A leading EIA professional in CAR)
- 'The issuance of legislation is often delayed by formal changes of leadership. A minister never stays more than a few years. The NA has contributed to a lasting context that makes it more attractive to new ministers to continue the work of their predecessors. It is more stable than the management of the ministry.'
- 'The EIA administration has formally asked the NA to help reinforcing the capacities of its personnel.'

## 6.5 Supporting norms and standards

The original foreseen outcome was: 'Norms and directives in support of environmental assessment are available'.

The study carried out in 2010, revealed that all countries had major shortages of environmental norms and standards compared to international practice. There is a growing body of directives on how to take effects into consideration, but generic measurable thresholds for pollution still hardly exist. The issue is high on the agenda of environmental administrations. Current practice in several countries seems to have achieved a level where this lack of legal ground becomes a bottleneck: it no longer suffices to apply international standards that are not grounded in national legislation.

Policy directives may serve as legal ground for permit conditions if they can be interpreted as a development restriction in individual situations. This option is increasingly chosen. For example in Rwanda sectoral guides (of which the authority REMA has published 13 in 2009) give some guidance. To that end, several respondents plead for the application of Strategic Environmental Assessment (SEA) of (sectoral) policies. Again, SEA legislation is generally seen as the first step, and indeed this legislative process has advanced to a degree in most PAANEEAC countries. An issue here seems to be that sectoral ministries must develop formal policies in the first place before these can be submitted to an assessment.

## 6.6 Assignment of responsibilities

The original foreseen outcome was 'The responsibilities for management of the procedure and making of decisions are clearly assigned'.

In general, respondents indicate that existing legal responsibilities are clearly assigned to organisations. The management of the EIA procedure is assigned to the ministry of environment - in fact this situation dates back before PAANEEAC. An exception is Rwanda, where EIA is the responsibility of the Rwandan Development Board (RDB), directly under the president. In that case, some tension is reported between RDB and the environment ministry, responsible for the environmental legal framework and inspection (which it has delegated to its agency REMA). Some respondents also report emerging unclear situations due to decentralisation in Cameroon and Rwanda. Environmental inspection, enforcement, SEA, and auditing often are also assigned to the environment ministry. These legal institutions, and responsible organisations, are generally less developed than the earlier stages of the regulatory chain.

These countries have no separation between the approval of an EIA report and the approval of the proposed development project, assessed in an EIA. Approval of an

EIA implies environmental approval of the project. Professionals are increasingly aware that this is a missed opportunity. Separation of the responsibility of experts (assessment of impacts) from that of political decision-makers (consideration of impacts in their decisions) can make both more clearly accountable on their own competency.

Clear formal assignment of responsibilities is no guarantee that the responsible persons will be aware of those and stick to them. In all countries there appears to be some confusion among sectoral ministries about the status of the environmental approval of projects: permission cannot be granted without it. Yet, sometimes permissions are given anyway.

## 6.7 Financing

The original foreseen outcome was: 'The necessary financial resources for an efficient management are secured'.

Financial resources still are weak points in all EIA systems. On the other hand, the EIA Mappings show that this is improving. Preparation of EIAs and organisation of public consultation must in all cases be paid by the investor. But when the number of EIAs increases, the administrative organisation of government is often too small. The government may not be capable of hiring independent experts when projects involving complex technology or complex impacts must be assessed. It is therefore difficult to make a critical review of the EIA reports submitted by project proponents. In many cases there is not even budget to visit the site.

Required public consultations are often not carried out. Some respondents indicate consultation is done where it is affordable and may provide most benefit. There seems to be little discussion about the appropriate cost of such administration to sectors and branches. In Congo, the mining ministry has agreed with the oil companies that they contribute to administrative costs, including those of inter-ministerial committees. But that is an exception. On the other hand there seems to be some optimism among respondents that political will to fund these systems, either from general taxes or specific levies may increase in the near future. This topic is further developed in a report prepared in the PAANEEAC programme (the NCEA 2013).

More worrying is perhaps the apparent unwillingness of ministries across the board to allocate funding to undertake EIAs for their own investments (if they are not forced by international donors). The lack of funding for monitoring and enforcement of permit conditions (and closely related auditing) is also likely to become more pressing as the total number of granted permits is rising quickly.

## 6.8 Empowerment of actors

The original foreseen outcome was: 'The actors have the required competences and the information to act in the EIA process'.

Significant steps have been made in training. In every participating country, at least 50 professionals have been trained, and in Cameroon hundreds. The consultants doing the studies as well as the civil servants that review their quality are said to have basic competences. The EIA procedure can therefore function at a basic level.

However, those actors that only now and then deal with EIA (not EIA professionals) are still ill prepared. This concerns investors, non-environmental NGOs, journalists, local authorities. The international meetings have reached out to some of these groups, but that is considered insufficient. This issue is frequently debated in the NAs. It seems to be a chicken-and-egg situation:

- Scoping reports, EIA reports, and development permits are usually not made public.
- There is little or no attention for such issues at schools and in universities.
- Citizens often are unaware of the legal possibilities to influence decision making.
- Once controversial projects have been built, there still is no public debate where politicians are held responsible.

In the NAs, there is regular discussion how education and information may change such cultural systems. Many respondents seem to believe that there are opportunities.

## 6.9 Data management

The original foreseen outcome was: 'A system for management and coordination of data about environmental assessment exists'.

A transparent practice, learning from experiences, building up jurisprudence and reliable rule of law all depend on a well-documented EIA system and EIA procedures. To improve, one must know what one is talking about. What are procedural requirements? Which standards apply in which situations? Which permit conditions have been imposed on specific developers? In the EIA Mappings done in 2006, it became clear that a lot of effort was needed to achieve that knowledge. Setting up of electronic and/or physical central databases and their systematic management was taken up as an objective of PAANEEAC. It became part of the joint projects with EIA administrations under the accompanying programme. These projects have only been started in 2012/2013, and they have not been implemented yet at operational level. Respondents indicate that they expect this to happen in the near future. As

yet, it is unclear if these systems will be easily accessible for the public or for professionals.

Figure 8. The library of EIA reports in an EIA administration, early 2013



## 6.10 Stakeholder involvement

The original foreseen outcome was: ‘The stakeholders, notably the populations, are involved at all stages of the process’.

This outcome has not been achieved by far, despite the optimistic responses from many respondents. What they say in interviews perhaps reflects a certain optimism fuelled by real but small improvements; but the EIA mappings done in 2013 indicate that the foreseen outcome is far from achieved.

The crucial step forward in EIA is that project consent decisions are published and communicated, with a reference to the impacts described in the EIA reports. Yet, respondents already view as major step the fact that populations and stakeholders begin to be consulted during the preparation of the EIA report. These efforts often still depend on available donor money or the free will of responsible enterprises. Consultation during EIA preparation however, is only one stage of the EIA process, and arguable not the most important one since it does not make the government publicly accountable for its decisions. In reality, few steps are being taken to make EIA into a public procedure for assessment and decision making. This is a frequent

topic of discussion in EIA mapping workshops. These discussions suggest that hesitations arise from a combination of lack of funding a more transparent procedure, and a fear that protests will be unleashed with which the state cannot cope.

**Table 13. Assessment, by leading members of NAs of stakeholder involvement in assessment and decision making**

Burundi	Not yet. Consultation is usually limited to public announcement of the project. More is done when donors are involved.
Cameroon	This has much improved. The way of public consultation in EIA preparation is not prescribed in detail. The population is not yet included before the terms of reference for an EIA are finalised.
Congo	This has much improved. The populations near the project site are involved during EIA preparation by a public inquiry and consultation, as well as after EIA preparation (public meeting).
CAR	Not yet. Consultation is usually limited to public announcement of the project. More is done when donors are involved.
Rwanda	This may have improved, but in practice the letter of the legal text is not always followed. Often, the EIA report is not published.

Source: associations

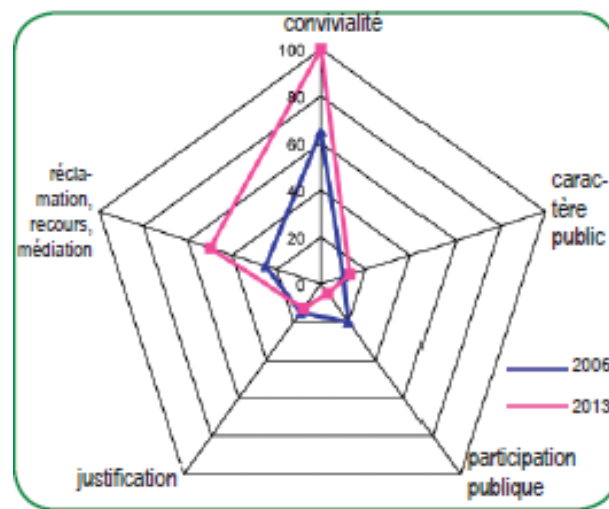
Quotes:

- ‘The public nature of decision making is weak because there are no obligations to publish the intention of making a decision about a development project, to defend a decision at a public meeting, or to publish the decision.’ (A typical conclusion of an EIA mapping session)
- ‘EIA is a tool for putting in place the Istanbul principles for effective civil society organisations’ (ref <http://cso-effectiveness.org/istanbul-principles>) (A member of civil society in Congo)
- ‘Our NA, an organisation of civil society, is often invited to, and takes part in, inter-ministerial committees responsible for review of EIAs. We are accepted as apolitical, knowledge based and neutral. We can express ourselves freely, and we are listened to. For example, we demand that minutes of consultation meetings, signed by participants, are attached to EIA reports.’ (An association member in Congo)
- ‘Generally speaking, the legislation about decision making has improved, but practice remains weak. (..) There are no improvements of the participation of the public.’ (A conclusion shared in a stakeholder meeting, after comparison of EIA Mappings in Rwanda 2006 – 2013)

- 'The weak spot of the EIA process is the publicity of the procedure. Approval of the ToR of the EIA, the views of the review commission and project consent decision are not published in the context of Cameroun.' (Cyrille Valence NGOUANA, environmental scientist, at the 2013 annual meeting of SEEAC, referring to Cameroun)

Figure 9. Diagramme from Bitondo et al (2013), showing the evolution of decision-making procedures in Cameroon 2006 - 2013

Public participation is assessed less developed in 2013 than in 2006, which is said to be caused by more awareness of the weaknesses of the system. The diagramme is taken from EIA Mappings in 2006 and 2013.



## 6.11 Approval criteria

The original foreseen outcome was: 'The approval criteria for EIA reports and decision making are known by all'.

Interviewed professionals mostly focus on criteria for the quality of information. The EIA Decree usually enumerates the types of impacts that must be considered. Professionals have access to that. Outside the group of EIA professionals such knowledge is limited. Ad hoc scoping may clarify criteria. With such criteria, the envisaged outcome is easily achieved: respondents are not ambitious in their interpretation of this outcome. (In addition, the same respondents often indicate that there is a need for more detailed guidance with respect to the required content of EIA reports, and that this guidance needs publicity. But that is another outcome.)

However, criteria for decision making about development projects are something else. These criteria are usually ad hoc since there are few official environmental norms and standards. Civil servants in the competent authority determine these criteria as they go along. Some respondents indicate that ad hoc decisions create

jurisprudence, to which access is difficult. No public records are kept of approved EIAs or permit conditions. It helps if countries have developed practical guidance how to interpret legislation and policy, but only Rwanda has guides for all sectors.

## 6.12 Right of appeal

The original foreseen outcome was: 'The stakeholders dispose of, and exercise, a right of appeal to the decisions made'.

This outcome has not been achieved. Legal appeal to an independent court exists in all five countries, but this right is seldom exercised. Respondents do not find this surprising. The decisions are seldom published. That is the first challenge. In Rwanda right of appeal is often used but apparently rarely in cases where EIAs have been done. Some respondents (in Burundi) believe that it may help if there were a court specialised in this subject matter. One NGO is highly negative about the quality of the legal system in Cameroon when it comes to enforcing authorities and firms to act according to the law.

## 6.13 Good governance

The original foreseen outcome was: 'The deficiencies of good governance are denounced'.

Respondents indicate that deficiencies usually are denounced. For example, during the EIA mapping seminars, general assembly meetings of the NAs, or the annual regional conferences of SEEAC. This pertained for example to issues like lacking norms, lacking public involvement, lacking political transparency and responsibility for (internal) administrative decisions, etc.

In the meetings to wrap-up the EIA Mappings done in 2013 (which took place weeks or months after the mapping seminar), people working at different ministries spoke freely between themselves as well as with members of civil society and academics. Subjects included for example how to prevent that sectoral ministries ignore EIA. This still occurs in all these countries. Participants explained their dilemmas and discussed how illegal practices may be restrained.

## 7. Impact

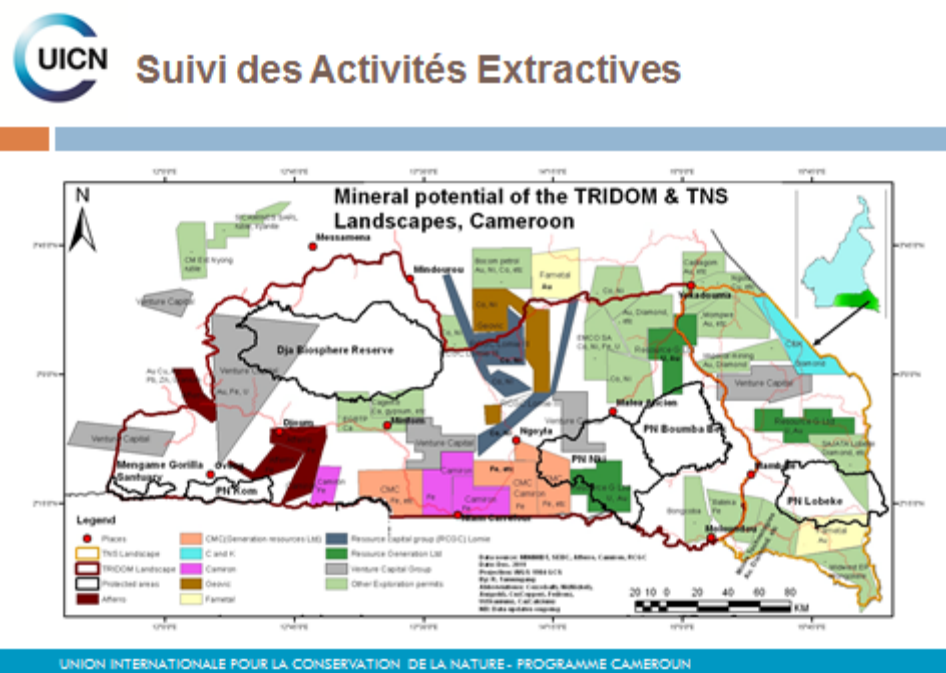
The general view of respondents was that PAANEEAC has permitted the five participating NAs to contribute effectively to the development of their national systems of environmental assessment. This is how they evaluate the outcomes. However, there are two obstacles to the observation of actual impact in terms of PAANEEAC's ob-



jectives good governance, poverty abatement and sustainable development. First, it is too early to measure significant improvement at that level because a change of governance practices is only just set in motion. Second, a more sustainable development would be attributable to more factors than only changes of governance induced by PAANEEAC.

Admitting that this is the case, many respondents do believe that EIA may function as an instrument for the promotion of these three target values of PAANEEAC. EIA in their view is a key instrument to address issues like climate change, sustainable forest management, sustainable coastal management, disaster management, desertification and environmental health. Respondents show a genuine dedication to addressing such issues through EIA, as an environmental NGO did in 2013 (see the Figure hereafter). Many of them share a certain optimism that robust developments have been set in motion. This is visible from the level of participation in PAANEEAC.

Figure 10. A slide used by an environmental NGO in the 2013 annual meeting of SEEAC in Douala, in its plea for EIA as a tool for dialogue about sustainable mining



Courtesy: Camille Jepang

PAANEEAC is seen as accelerating an evolution toward good governance. EIAs are carried out in a higher percentage of cases in 2012 than in 2005 (these are the years for which statistics were available when the EIA mappings were made in 2006 and 2013). EIAs are increasingly reviewed by inter-ministerial committees. Populations begin to be consulted about decision making. Some respondents in Cameroon, CAR and Congo indicate that politicians increasingly become connected to the networks.

## 8. Analysis

Respondents have been asked to assess the links between input, output, outcome and impact. This analysis relies on their perceptions of causality. Open questioning led to a wide variety of answers. In this analysis we boil this down to the following causal mechanisms respondents saw:

- An elaborate preparatory phase
- A robust structure of objectives
- Influential platforms
- A management system aiming at self-organisation
- Synergy between the NCEA's roles and small grants
- Synergy between national and sub-regional level

It appeared difficult for many respondents to explicitly reflect on downsides of PAANEEAC. Nevertheless we also reflect on the weaker downside which each of these mechanisms has. Therefore, that part of the analysis is slightly more interpretation based. In the next chapter we reflect further on these perceptions.

### 8.1 An elaborate preparatory phase

#### **Strong**

PAANEEAC's context, when it started in 2008, was in many ways favourable:

- Leadership existed in the region, and it was recognised by the NCEA. EIA in Africa had been discussed for a long time in platforms like CLEEA. Its sub-regional nodes had emerged already – with some donor involvement. A network of professionals therefore existed in Central Africa, and in this network were sufficient professionals capable and willing to take initiatives. The NCEA saw this opportunity.
- Economic opportunity made EIA relevant and affordable. The sub-region has an increasing level of economic investment. These investments often require an EIA. The economic momentum can also be used to develop and finance operating EIA systems as frontline tool for better governance.
- EIA is not only an interest of environmental authorities, but also of authorities in other policy areas that benefit from sustainable development. EIA is not limited to environmental impacts for which the environment ministry is responsible in these countries. All unintended, collateral impacts of development projects belong to the scope of EIA. This makes EIA a tool for better governance of economic developments.
- EIA was seen as potentially highly influential. In these countries professionals regard EIA to be potentially a key public planning procedure to facilitate market development. There are usually no other procedures that formally require involvement of the public – thereby creating an incentive for gov-

Aware of these conditions, the NCEA has chosen the sub-region Central Africa for a regional approach to capacity building. In addition there were some other initial conditions when PAANEEAC started in 2008, which the NCEA was able to influence:

- Credibility through a differentiated approach. The method of EIA mapping was applied before PAANEEAC started. This enabled a regional approach based on similarities as well as on differences between these countries. This added to credibility from the start.
- Logical framework approach. DGIS and the NCEA required a logical framework approach, stimulating the NAs to be clear on their intentions. It also facilitated the present evaluation.
- Quality by showing patience. A long preparation followed, caused by inability of NAs to obtain a bank account. The NCEA and DGIS patiently waited for the NAs to show leadership and commitment and resolve this problem. This also allowed the NCEA to develop effective management principles for the programme and to agree about these with the NAs. This paid off when PAANEEAC took off, improving its quality.

### **Weak**

The NCEA's input during the preparatory phase was considerable. For example, it developed and applied EIA mapping. PAANEEAC's cost is therefore actually higher than estimated in this evaluation. On the other hand, the investment in the EIA mapping method does not only pay off in Central Africa, but also in other regions. PAANEEAC itself also may inspire new programmes.

## **8.2 A robust structure of objectives**

### **Strong**

Initial conditions were not only favourable, but these favourable conditions were also reflected in the formal structure of objectives. Respondents were motivated by PAANEEAC's objectives, PAANEEAC's approach, and its people, as summarised in the table below. This is presumably the main reason why hundreds of professionals spent significant voluntary time in PAANEEAC's activities. Contributions to sustainable development and good governance were mentioned as potentially realistic impacts of PAANEEAC. Poverty was seen as a socio-economic issue, covered by EIA. The structure of objectives still stands at the end of PAANEEAC. Its components remain important. NAs are looking for a replacement of DGIS as donor. A platform remains needed to continue the work of professionals.

This structure of objectives has been developed primarily by SEEAC, with the NAs and assisted by the NCEA. The NCEA insisted on a logical framework with an appealing theory of change; in particular by allowing for tailor-made action plans for each country.

**Table 14. Structure of PAANEEAC’s objectives in a nutshell. The arrow indicates rationale: how desired impact attracts input**

	National	Sub-regional
Impact	NAs contribute to EIA as tool for good governance, poverty abatement and sustainable development	
Outcome	Platform of professionals; legal and institutional framework; capacity of all actors; acknowledgement of the role of EIA in governance Thirteen specific outcomes	
Output	Activities by NAs and SEEAC	
Input	DGIS: Seed funding The NCEA: Technical Assistance, Coaching SEEAC and NAs: General functioning and implementation of action plans	

**Weak**

Despite existing NAs and leadership, the NAs took a long time to develop their enthusiasm. Trust in the process and in its partners grew slowly, and it was strongly dependent on the efforts of the NCEA. To some extent the NAs still behave like they depend on the NCEA. It mainly seems that NAs fear to lose their trusted coach (to ‘swim without a lifeguard’).

Key choice of PAANEEAC was to stimulate ownership among professionals for good governance of development projects, starting with EIA. Respondents are aware of the limitations of such an approach. At the end of the day, politicians need to be prepared to consider environmental information and to justify their decisions. There was belief among professionals that some politicians are willing to do that. PAANEEAC is said to have promoted country ownership of sustainable development.

At the end of PAANEEAC, several respondents indicate that EIA is but one link in the regulatory chain. They suggest the programme could have been more balanced

from the start if the whole regulatory chain had been its object, for example including inspection and auditing of existing facilities. Only in a late stage, PAANEEAC widened its scope. Consideration of the whole chain gives hope that improvements can focus on its weakest link. This increases the hope that economic developments can be regulated. Respondents are aware that at all of these stages, the government should base its decisions on a-political knowledge.

### 8.3 Influential platforms

#### **Strong**

NAs and SEEAC were, and still are, led by charismatic informal leaders. Several of these leaders are highly skilled at bringing a network to life. They succeeded in linking-up by constructive dialogue with members of the EIA administration, sectoral administrations and interest groups outside the government. The fact that in some countries politicians and highly ranked civil servants of several ministries participated, suggests the influence of these networks. These professionals became inspired and tried to influence the agenda of their own organisation. NAs organised well moderated meetings and activities. At international level SEEAC and NAs participate in legal harmonisation.

EIA professionals, guided by the NCEA, have built apolitical platforms, with good governance and sustainable development as its shared goals. This was acceptable to EIA administrations as well as other interest groups. These permitted their employees to be active in the NAs. Platforms were inviting enough to discuss the shortcomings in governance. NAs saw to it that they did not primarily become generators of income for their members – although mixed motives obviously occurred.

The NAs have tried to consciously select the types of interventions that were timely in their context. If adopting a law takes a lot of time, is it useful to develop a practice anyway? Is it useful to adopt a law that cannot be put in practice for a long time? Decentralisation of responsibilities to local authorities requires capable local authorities first, so wouldn't it be more effective to focus on the national level?

These are subtle choices where no general answers are possible. No one choice is clearly the best in a given context. Sharing knowledge through the platforms may increase chances of developing an effective intervention. NAs therefore actively connected with people working in the appropriate organisations to share knowledge. The NAs also looked at approaches in neighbouring countries. Sometimes, where official organisations failed to take necessary steps, the NAs filled this gap. For example, when the EIA administrations did not communicate widely about the EIA system. The choices were reflected in the activities NAs have undertaken. The more costly interventions they chose were training and education of EIA professionals, and joint projects with EIA administrations. The indirect effects, like the effects

of these interventions on law-making processes, are difficult to assess, but important.

NAs have no formal power and no other interest than contributing to good governance and sustainable development by linking knowledge to decision making. This makes them acceptable for many stakeholders. The fact that a constructive informal dimension is added to the formal process in all these countries indicates a more open culture in the government. Some civil servants, from different sectoral ministries, see value in having an informal 'counter-weight' that can help them self-reflect without becoming a threat. Behind closed doors, a lot is often freely said. Respondents rarely say that they hesitate to express their true opinions.

PAANEEAC has clearly enabled the platform function and improved the quality of interactions through the activities it has sponsored. The NCEA was always available as sparring partner when difficult choices needed to be made. It tried to empower the EIA professionals to do it themselves. This was highly appreciated.

#### **Weak**

In each country, specific interest groups were missing as participants of PAANEEAC activities. Missing groups may be environmental consultancy firms, environmental NGOs, local NGOs, local governments, investors or politicians. For example, to whom should the NAs connect in order to create more support for public participation and more solid funding? In 2013, the NAs have organised training sessions dedicated to journalists. The aim was to awaken political interest in public debate about development projects and how the government makes decisions. However, connecting with journalists is only a first step.

There are also dependencies between members that affect dynamics. For example, consultants (including many NGOs) often depend on EIA administrations for certification or otherwise. This may affect their willingness to openly express their views. Some civil servants have little freedom to participate in seminars or courses, unless in their private time. A lot therefore depends on their personal enthusiasm and support of their superiors.

The NAs have no formal power. This is a strength but also a weakness. The government remains sovereign in public decision making and in preparation of legislation.

## **8.4 A management system aiming at self-organisation**

#### **Strong**

PAANEEAC allowed NAs to self-organise within the limits imposed by the management rules that had been agreed at the start. These management rules enabled the NCEA to stimulate the NAs and SEEAC to function as healthy associations of EIA

professionals. This includes establishing a functional general assembly with voting rights, an executive board, a membership fee system, and agreements about other income sources that are not at odds with the platform function. It also implies strict financial accounting, which is required when an association is partly donor-funded.

The associations and SEEAC have come far in their capability of maintaining the level of performance they acquired in the last years of PAANEEAC. This includes the capability of generating enough funds to hire at least one permanent staff. They are now empowered to attract other donors. Before, some of the NAs did not even exist as formal organisation, and therefore were ineligible to receive funding.

The seed funding for general functioning of NAs and for specific activities was just enough to bring NAs at a higher level of organisation. The management principles have stimulated NAs to find the right level of subsidy: the budget was fixed, and with a smaller subsidy per activity, they could undertake more.

Respondents view the NCEA's coaching role as essential component of PAANEEAC. The NCEA saw to it that the management principles were applied in practice. According to managing NA members in all NAs the NCEA was open and critical in a constructive way, and sometimes strict. When NAs were not meeting management principles, budgets that had been allocated to them were sometimes lost. Appropriate behaviour was often rewarded by compliments and where applicable by prompt payments.

Looking back, the NAs unanimously say they are content with the NCEA's role: their permanent staff and their executive bureaus understand the need and use of management procedures now. They see how it can help them achieve a goal-oriented, strategic operation, and acquire new sponsoring in the future. As all information was shared in the network, openness has emerged between the different NAs. At present they feel freer to share their dilemmas and ask help from each other. Since PAANEEAC-funding was evenly distributed between them, competition for funding was not needed. This also added to openness.

Many NA members gave examples of how they appreciated the NCEA's coaching inputs. One Rwandan member appreciates the constant availability and proactive attitude of the NCEA via internet and telephone. A Burundese member sees the NCEA as mediator between professionals and the EIA administration. SEEAC appreciates the way the NCEA insisted on seeking a new permanent staff via an open procedure. There are many examples like that.

### **Weak**

The permanent staff of the NAs and SEEAC changed several times. Each time, this proved to be a setback. Management and organisation of activities depended on them, and they had no colleagues to maintain the organizational 'memory'. This is seen as an intrinsic difficulty of this mode of operation: the financial basis of NAs

and SEEAC may never be strong enough to pay more salary in order for staff not to leave, or to hire more staff. To some extent this may be compensated by working in an international network where new recruits may be helped by more experienced staff from other associations. Another option is to include unpaid members in bookkeeping and daily management training and coaching.

The NAs may have insufficiently been able to create a professional culture. In such a culture, for example, members failing to pay their fees are expelled. They also indicate that donors other than PAANEEAC may not have been systematically approached sufficiently. All agree this is crucial for financial autonomy and for associations to remain at this level of performance. The temporary financial safety PAANEEAC offered may have contributed to this reluctance, despite clear communication from the start that PAANEEAC would not be prolonged. To a degree NAs themselves also recognise this weakness. They indicate that change of culture is not easy, that conditions for many members are harsh, and that everything depends on voluntary workers. In 2013 this had their full attention.

One respondent indicates that the NCEA could have done more to help the NAs find new donors: rather than helping the NAs to find donors themselves, the NCEA could have approached these donors for them. This is not the predominant view, however.

## 8.5 Synergy between the NCEA's roles and small grants

### **Strong**

There was a synergy between the NCEA's roles: management coaching, technical (EIA) assistance and the availability of DGIS's small grants (available base funding for functioning and activities of NAs and SEEAC). All respondents who could reflect on this question indicate that all three inputs were needed to create the outputs, and that alone created a synergy between them:

- The available funds were just sufficient to create a minimal implementation capacity. Some momentum was generated.
- Without the NCEA's management coaching the NAs would not have been able to function more or less professionally, and they would not have felt the ownership.
- The NCEA offers up-to-standard experts on EIA systems. Because they were involved from beginning to end, they were well acquainted with the situation. They were able to advise the NAs about the options regarding development of their EIA systems and to provide training sessions. Where needed they could hire other experts.

It is not just that each one of these inputs was necessary to make PAANEEAC successful. The synergy between them was also enhanced because they were all provided by a small NCEA team. For several years, two members of the NCEA staff



were dealing with a number of organisations in Central Africa. By combining management, coaching and technical activities, the NCEA staff achieved extra leverage for quality. This worked with the following mechanisms:

- During each visit to Africa they combined all these tasks as required.
- They often combined several countries in one visit.
- They coordinated their work among them when in the home office.
- They were able to spend time on PAANEEAC only at moments when their input was required. (When at the home office, or in PAANEEAC countries where the NCEA also has other projects, they combined their PAANEEAC-work with these other projects.)
- Team members could complement each other since both had their own strong points.

### **Weak**

Because PAANEEAC included five countries, travel cost was considerable. The distance to Europe is large for the NCEA experts. For a similar budget it would have been an option to install one long-term expert in Africa. This would have reduced travel cost, but it would also have reduced the synergies in the team, mentioned above.

## **8.6 Synergy between national level and sub-regional level**

### **Strong**

The 'regional approach' relates to working with 1) national associations (in this case five) in several countries of a sub-region (in this case Central Africa), and 2) with a sub-regional association of which they are all member (in this case SEEAC). In case of PAANEEAC, the regional approach generated a constructive peer process, an economics of scale and it facilitated connections with international organisations:

- The professionals from different countries were able to learn from each other in a peer process. They compared country situations, national EIA systems, opportunities and their activities.
- An economics of scale occurred because managing a programme with five national associations was more efficient than managing five different programmes. For example:
  - Similar activities in several countries could be combined into sub-regional activities;
  - Acquiring and accounting for one large programme to a donor (DGIS) was less time consuming than it would have been for five different small programmes.
  - The international seminars in each of the countries drew more attention than national meetings would have done.

- Management procedures only had to be invented once for five countries. Because these systems are the same, permanent staff in different countries could help one another in case of difficulties.
- It also became easier to cooperate in developing joint proposals.
- There is a general belief among EIA professionals that supranational EIA authorities are needed. Only supranational EIA authorities may, in the view of professionals, take responsibility for the harmonisation of national EIA systems. That is necessary to avoid unnecessary differences which could make transboundary EIA less effective and to stimulate an international sustainable level playing field for investors. These goals have not yet been achieved during PAANEEAC. Still, the hope of achieving this potential synergy in the longer term, if regional cooperation survives PAANEEAC, made the regional approach more attractive.

These synergies are partly independent on PAANEEAC: they may continue to exist after PAANEEAC. This is why the NCEA helped NAs and SEEAC at many occasions to safeguard the vitality of this international network. For example, by ensuring that NAs rewarded SEEAC by means of membership fees (ownership). The most recent statutory regulations of the network of NAs take this structure fully into account. A vital network also needs open communication, which is also clearly emerging. Key elements are mutually reinforcing annual general assemblies, strategic planning cycles, internet sites and newsletters at national level and at SEEAC level.

In other countries of the region of Central Africa, there were no national associations fully participating in PAANEEAC. Yet, EIA professionals from these other countries frequently participated in SEEAC's international seminars and in other Central Africa wide communications. In the future, the achievements of PAANEEAC may be transferred to these other countries if their context is receptive.

### **Weak**

The link between PAANEEAC's budget and the number of participating associations is not clear. PAANEEAC focused on countries where national associations of EIA professionals existed, and which were willing and capable to agree with the management principles. At the end of the day, five NAs fully participated in PAANEEAC. There is some coincidence in that number, since it is the result of contextual conditions that PAANEEAC could not influence. But it is difficult to say whether this number (five) is also optimal from the perspective of the synergies achieved by a regional approach. With the available budget (appr. € 1 million for small grants) and the available NCEA staff (2 part time technical secretaries), perhaps more countries might have been included in PAANEEAC- if these had met the conditions.

## 9. Reflections

This chapter reflects on the following questions, based on interpretations of the data gathered in this evaluation:

- How can the respondents' enthusiasm for PAANEEAC be explained?
- Why is it so difficult to make decision making more transparent in these countries?
- What are key characteristics of effective NAs?
- Are NAs doing the right thing?
- How important is a sub-regional EIA administration?
- Do benefits of PAANEEAC weigh up to costs?
- Should donors be interested in supporting approaches like PAANEEAC?

These more philosophical questions emerge as relevant from the interviews and the EIA mapping workshops.

### 9.1 How can the enthusiasm for PAANEEAC be explained?

First of all, it took some years before enthusiasm emerged. NAs needed two years to become eligible to receive PAANEEAC funding. It took three years of professionalising management at a basic level. All have created a boost of enthusiasm through the international seminar they each organised in a different year. Only two years, 2012 and 2013, remained to function optimally. In these two years specific training sessions added to quality, and more members participated. There was more debate on the identity, position and possible resources of the NAs.

Respondents often explained their enthusiasm referring to similar factors:

- **Sustainable development is a pressing issue, and EIA can contribute through its effect on governance.** Respondents are aware of the challenges and opportunities in their countries with respect to development. They easily gave examples of types of issues they believed may be addressed through better governance.
- **The focus on the platform function.** This was attractive due to the following factors that were already present in the country, and fostered and enabled by PAANEEAC:
  - **Informal leadership.** Each country has one or more champions of EIA; these are academics, consultants and civil servants. As sustainable development is the responsibility of all actors influencing governance, these champions were able to motivate others to discuss this issue. At their regional meetings they explicitly discussed what they did to animate their network. They often brought influential people

- **Political craftsmanship.** Participants were often capable of influencing the evolution of EIA systems, stimulating that environmental information is taken seriously. For example, a decision in Cameroon to postpone decisions about large investment projects in order to gather more EIA information. In Congo, NA members are now regularly invited to inter-ministerial committees. In the Central African Republic, the NA president has become minister of environment, ecology and sustainable development.
- **Well-functioning informal networks.** Once these networks had built up momentum, they became robust and attractive for others to invest their time in. They are said to be less sensitive to job changes, and they are driven by people with a shared motive rather than by the individual responsibilities that formal leaders have. In addition, these networks are flexible, because they can quickly adapt their action to emerging opportunities, without having to consult superiors. The downside is, of course, a lack of formal power. They depend on opportunities to convince organisations and their formal leaders to take steps. This requires social skills, in particular trust building.
- **Focus on apolitical civil society.** Groups shared a concern for sustainable development and good governance without necessarily having to agree on how to achieve it. Several mentioned EIA mapping as an activity that combined capacity building and constructive dialogue about this central issue.
- **EIA as frontline tool.** EIA adds expert knowledge to the most influential decisions governments make about economic development: development consent. Once a government allows an investor to construct a project, this usually cannot be undone. Many impacts of project consent are therefore irreversible. This decision – if it is openly made – is likely to attract the most attention from stakeholders, media and politicians. Less irreversible government decisions are strategic decisions before consent and corrective actions after consent. Since project consent is the frontline decision along the regulatory chain, EIA is the frontline decision-making tool. From there on, it is easier to extend the discussion to other government decisions along the regulatory chain, like SEA, inspection and auditing. This is precisely what happened in the course of PAANEEAC.
- **A wide scope for EIA.** Whereas environment is an important interest, the phrase ‘Environmental Impact Assessment’ is in PAANEEAC actually *pars pro toto* which stands for ‘Environmental and Social Impact Assessment’, or any collateral impact that is not intended by the developer. This includes the wider socio-economic development. This was discussed from the point of view of high quality – i.e. sustainable – economic development, as well as from the point of view of streamlining procedures and creating a level play-

- **An incremental approach with a clear objective.** PAANEEAC was realistic: things cannot be changed overnight. The law is still often bypassed by giving development permits before an EIA has been carried out. Decision making still remains a black box. Budgets are still small. The NA members and other participants are keenly aware of this. PAANEEAC has given them a language to share views about incremental steps in the right direction. Visible steps are primarily made by the EIA administrations and the consultancies. The NAs influence conditions. In several countries they indicate that for further steps more political support is needed. To that end, one of their next incremental steps is linking up with journalists. Another is to organise training sessions for larger groups, both in terms of numbers of participants and in diversity of stakeholders.

## 9.2 Why is it so difficult to make decision making more transparent?

One of the main goals of EIA is to create transparency about how the government takes environmental and social impacts into consideration when it makes decisions. Governments make themselves accountable to their voters. They do this by explaining to the public why they have made a specific decision. To that end, the public and organised stakeholders groups are consulted about their views and interest before the decision is made. Professionals are aware that EIA has the potential in these countries to become the first tool to create a public procedure that requires the government to publicly justify its project decisions from an integral point of view. Yet, project consent decisions usually are not even publicly available. Few visible steps are made in that direction. Why is that so difficult? The available information suggests that the following factors play a role there:

- **Transparency can make vulnerable.** Public decisions early in the regulatory chain limit the options decision-makers have later on. It is easier to turn around a decision that has not been published. There is also a fear that early transparency may release forces in society that cannot be controlled. These governments have not (yet) experienced that these forces may be released anyway, perhaps more fiercely, when controversial projects are implemented without transparent procedure.
- **Transparency requires internal coordination in the government.** EIA is seen as a 'transversal' instrument: government as a whole can only give its consent to a project once. All stake holding ministries must integrate their own decision making process to produce a single project consent decision. Most countries have inter-ministerial committees for each EIA, where all relevant ministries are invited. Usually, the DG Environment chairs this committee. In practice, internal coordination of decision making is still weak. Transpar-

- **Next steps are not obvious.** Is such change realistic in these countries? Discussions at EIA Mappings suggest that professionals have some hope, but steps toward improvement are not obvious. Next steps might, for example, be to:
  - help the press create conditions that favor transparency;
  - improve the cooperation between ministries so they can jointly communicate with the public;
  - look for politicians who are willing to be more transparent in specific cases of EIA;
  - reduce the vulnerability of the authorities to informed criticism by improving the quality of expertise in scoping and review of EIAs.
- **A social learning process on a wider scale is needed.** Most NAs talk about more training of professionals, education of larger groups and publicity about the existence of the procedure. However, involving the press – which they are doing – also is a crucial ingredient. If cabinet were to embrace transparency only in a single case of a controversial development project, the press may inform the public. It may stimulate a learning process in larger groups: they experience a transparent decision-making process. That may lead to a context where politicians are more willing to be transparent in general, like has happened in other countries, such as those of southern Europe.

The transition toward opening up of government decision making may not occur in the short term. Even if not transparent, EIA can contribute to sustainable development. Decision making for development projects will then remain administrative and without ramifications in the media and in politics. Even then, respondents say EIA provides checks-and-balances between ministries and it draws on expertise (from civil servants and consultants). Most importantly, once sustainable development options have been discovered through EIA, these may not necessarily contradict vested interests in the government. From this point of view, most respondents prefer to aim interventions primarily at building an EIA system that creates inter-ministerial balances and allows mobilising sound knowledge for use by the government. This includes knowledge of stakeholders' opinions and is in itself already rather complicated. Respondents seem to believe that a credible government should first establish such systems internally before opening up the decision-making process to the public. However, this would be rather expensive, and the strategy could fail if there is no political willingness to finance such a system. For example, publishing government consent decisions and their justifications may increase the cost of appeal.

### 9.3 What are key characteristics of effective NAs?

PAANEEAC's best output was perhaps, that it has enabled discussions about what makes NAs effective platforms for EIA professionals.

As the evaluation shows, many participants have contributed to the outcomes of PAANEEAC. It seems reasonable to assume that they took part only, if they felt it would also bring them personal benefit. Organisational characteristics of NAs required to build such trust may be:

- Associations of EIA professionals should not plead for specific project decisions. An NGO acting for specific environmental interests, while opposing others, cannot easily bridge gaps.
- They should not influence the relative competitive power of different consultants who are member. Whereas becoming member may help consultants acquire projects, they should have equal chances.
- They should offer a neutral soundboard to the government. Different ministries may cooperate with one another more easily if a neutral moderator facilitates their dialogue. An NA also may add uncontroversial facts to that dialogue.

Neutrality is difficult to institutionalise: it depends on skilled informal leaders. When listening to these leaders, in each of these countries, an image emerges of people who try to connect other people with each other, to build systemic elements, animating a network. It is like spinning a cobweb of trust around power to make it increasingly safe to take incremental steps toward transparency. They enable people to connect as persons and experts, rather than as representatives of hierarchical organisations. Only in their official capacity they may have some influence. This is how informal leadership through associations of professionals may help political leadership to set their administrations in motion to improve EIA systems.

### 9.4 Are NAs doing the right thing?

There was ongoing thorough debate within PAANEEAC about priorities for action. It is not easy to add to this. With some caution, some reflections:

- Many respondents seem to overlook the need of building organisational and management capacity in the EIA system. They focus on capacities of individual actors, foremost civil servants and EIA consultants. However, issues of decision-making are too complex for individuals to oversee. EIA helps combine expertise of many individuals. This works providing it can be organised in practice. The capacity of organising efficiently across organisations and moderating meetings on sensitive issues seems insufficiently addressed.

- In none of the PAANEEAC countries, the private investors are themselves connected to the NAs. If such investors want to contribute to sustainable development, it is reasonable to assume that the dialogue NAs foster is in their interest. They might support the NAs' agendas, for example by organising seminars or training sessions. Examples in Western countries show that ethical enterprises may be of great value, but this is unexplored territory for Central African NAs. There seems to be an uneasy relationship between the joined-up ministries and the private sector.

## 9.5 How important is a sub-regional EIA administration?

This evaluation shows the synergies a sub-regional approach creates for NAs. A sub-regional approach for administrations may also create synergies. When both exist, both dynamics may reinforce one another. It is reasonable to assume that potentially, these new country-to-country and administrations-to-professionals connections create a much more effective overall governance system.

PAANEEAC has looked from the start to create a momentum for a sub-regional EIA administration. A core group of professionals, including the NCEA staff, believe that the sub-regional level really may become a motor of change if the EIA administrations start more intensive collaboration. The realisation of such an organisation could be near. Success however, will probably depend on ownership of this development in at least some Central African countries willing to lead. The EIA administrations in the PAANEEAC countries have not been drivers of this development.

## 9.6 Do benefits weigh up to costs?

Have the inputs of PAANEEAC been well spent? This question is impossible to answer. The inputs are well-known, but the benefits cannot be quantified. The present and future evolutions in EIA systems which PAANEEAC has enabled cannot be measured in terms of sustainable development, let alone in terms of money. Even the sustainability of the outcomes is uncertain, given political instability. PAANEEAC has contributed to more robust networks of EIA professionals, but during a longer period of stagnation or conflict they could possibly dissolve.

The following reasoning suggests that benefits do weigh up to costs:

- Volunteers have dedicated their time to PAANEEAC's objectives. They are enthusiastic about the outcomes they have created. They tell stories about how they think these outcomes may contribute to sustainable development. They at least think their own input – in combination with the Dutch input – is well spent.
- The PAANEEAC approach looks for pragmatic, piecemeal changes in implementation processes. There appears to be room for a slow process of im-



## 9.7 Should donors be interested in supporting approaches like PAANEEAC?

The answer is yes, if conditions are favourable. In Central Africa itself, the job is not finished yet. The NAs and SEEAC still need donors. It is unlikely that national and future international EIA administrations will be able to fill the gap PAANEEAC will leave. Donors may support NAs that are interested in supporting a country to take ownership of sustainable development by regulating economic development. They can also do that at sub-regional level to create a critical mass. They may focus on specific sectors, like oil and gas industries or deforestation. They can also focus on certain cross-cutting themes, like climate change, gender, or any impact of economic investments. They should be patient and willing to take the risk that future conflict could set the country back.

## 10. Conclusions

PAANEEAC has achieved a significant part of its objectives, as reflected in its logical framework. Inputs were used to create the output and outcome that, under the current circumstances, were achievable. Stakeholders are optimistic about its long-term contributions to good governance, poverty reduction and sustainable development. However, a benefit-cost analysis is not possible.

Overseeing input, output, outcome and impact, respondents indicate:

- PAANEEAC has enabled EIA professionals to organise themselves.
- Three elements have all been necessary: seed funding, technical assistance, and management coaching.
- There was also strong synergy between the sub-regional and the national level. There was efficiency gain and a peer process.
- In this way, the EIA professionals could create influential platforms for dialogue.
- The NAs now have the management skills to continue this performance, and to find donors. Whether this will succeed depends on the initiatives they take.

Important success factors were, according to respondents:

- A long, constructive, preparation time.

- The NAs were in charge of PAANEEAC within the framework that had been agreed at the start with DGIS and the NCEA.
- The NAs showed informal leadership, needed to animate a network of professionals. In particular the resulting cross-fertilisation between civil society and government is remarkable in this sub-region of Africa.
- The NCEA has coached the NAs to perform within the agreed framework and to professionalise their management. Transfer of payments was conditional upon approval of management documents.

## 11. Recommendations

### 11.1 General

It is possible that there are more African regions where a PAANEEAC-like approach is feasible. Initiators of such approaches are specifically recommended to:

- only start such an approach if professionals show enough initiative and leadership, successfully animating networks;
- undertake EIA Mappings or similar interactive diagnostic tools to develop a shared agenda;
- bring together this agenda (bottom-up) with donor agendas (top down);
- take precautions for a professional and transparent management of the different available funds;
- keep a wide focus on sustainable development and good governance, connected with issues like social equality, biodiversity, environment, and level playing field for investors;
- regard EIA as a key frontline tool but consider it in connection with other tools for regulation of economic activities, such as permitting and enforcement;
- when administrative systems are in place, focus on awareness raising of large groups to enable a healthy public deliberation about investment projects and about sustainable development;
- pay attention to individual capacities as well as organisational challenges.

### 11.2 EIA Administrations

EIA Administrations are recommended to:

- use NAs as counterweight or sparring partner, and to develop criteria for financial support of only one eligible NA of EIA professionals;
- cooperate with other EIA administrations in Central Africa under the RACEEAC initiative;

- follow suggestions from the EIA Mappings, which are country specific.

### 11.3 National associations of professionals and SEEAC

NAs and SEEAC are recommended to:

- Continue presenting themselves as neutral and not as environmental NGOs triggering public debate about specific controversial development projects. The NA, or at sub-regional level SEEAC, might then take a mediating role focusing on quality of the EIA and governance process. This position has proven to be effective and can make it easier to attract a variety of financial resources.
- Pay more attention to management skills that enable to mobilise expertise to decision-making processes along the regulatory chain. Such skills include, for example, efficient organization and moderation of meetings. PAANEEAC has enabled such skills to emerge at some scale in Central Africa. It is only the beginning.

In particular SEEAC is recommended to:

- Present the professional network to the donor community, offering an agenda, experience and skills acquired in PAANEEAC.
- Take over the NCEA's coaching and management role towards the NAs. In the SEEAC team the skills are available but a conscious decision needs to be made, to dedicate enough time to this role. This decision should therefore be supported by its members.

NAs and professional networks in other sub-regions are recommended to:

- Consider starting a similar programme, if conditions are favourable.
- Review management document formats used in PAANEEAC as example (see appendix 1).
- Ask donor help to develop the required skills, if these are lacking. The NCEA's management coaching has roughly cost around € 20 000 per year per country (half of the NCEA's own input plus 10% administration cost out of the DGIS grants, in 5 countries in 6 years)
- For donor credibility, it is suggested to make all management documents available on an internet site.

## The NCEA

The NCEA is recommended to:

- Remain available to coach SEEAC in its coaching and management role toward the NAs.
- Offer the method of EIA mapping online and train moderators in its application.
- Look for another region – and a donor – where networks of professionals need help in a regional approach to capacity building for sustainable development. In that case do not underestimate the time needed for coaching and management.

## 11.4 Donors

Donors who are interested in sustainable development in African countries are recommended to:

- Consider working with networks of EIA professionals, in particular if the government is incapable of making progress in good governance of economic developments.
- If their objectives relate to specific aspects of sustainable development (e.g. climate change), consider supporting these networks organise activities around these themes.
- Choose a sub-regional approach where conditions are favourable (as described in this evaluation). Link with other donors to create momentum (donor basket).
- Help EIA professionals develop general management skills required to manage donor funding. (the NCEA, or another fund manager and coach, may assist).
- In a sub-regional approach consider PAANEEAC's management principles, and combine countries with comparable cost levels.
- Take enough time for preparations (PAANEEAC shows this can take years, during which constant attention is needed).
- A donor basket fund must allow the NAs to maintain their neutral position. (Either provide base funding or allow for an overhead factor in the financing of activities, to help preventing that NAs for survival are forced to compete with consultancy firms.)
- Invite the future RACEEAC and international private companies to participate in the fund. The fund may be segmented to facilitate this; i.e. specific donors may earmark their contribution to specific requirements.

In the particular case of DGIS, the policy document 'What the world earns. A new agenda for aid, trade and investments' (5-4-2013) may serve as reference. It suggests that the PAANEEAC-approach fits the following DGIS-objectives:

- Facilitating transparent operation between NGOs, actively participating in policy processes, playing a watchdog role for governance, and enabling environmental NGOs to play a watchdog role in their topic areas. Enabling these NGOs to become a robust national factor, not just participating but also taking an informal leadership role.
- Generating hybrid partnerships between NGOs and administrations, and potential private companies who want to lead in sustainable development.
- Safeguarding international public goods, like those related to mining, forestry and water management.

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