PAKISTAN'S NATIONAL CONSERVATION STRATEGY: RENEWING COMMITMENT TO ACTION

Report of the Mid-Term Review

by

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ABOUT THIS REPORT

This report was prepared by the External Review Team (ERT) and is based on findings of the Team, including other results from the Pakistan National Conservation Strategy Mid-term Review (MTR). The main period of work took place during 1999-2000. Comments were received between July-November 2000. This final version was completed in November 2000.

CHAPTER 2. THE NCS REVIEW

The NCS Review and Final Report

- 2.1 The NCS Mid-Term Review (NCS MTR, see Annex 1 for TOR) is intended to "enable the stakeholders (government, civil society and supporting institutions) to take stock of the current situation and take necessary steps for mid-course correction." Taking stock of the NCS ideally should include: (1) both quantitative and qualitative assessments; (2) getting a sense of what has been achieved collectively and individually; (3) sharing experiences of what worked and what didn't work; (4) exchange of views and impressions through interviews and focus groups; (5) revisiting goals and targets; and (6) seeking renewal of commitments. Much of this work was accomplished over a year-long process involving people within Pakistan.
- 2.2 An External Review Team (ERT) comprised of Pakistani and international members (Annex 2) came in at the late stages to assess the findings and to prepare the report. The review was not an easy task given the decade-long period since the start of work related to the NCS and limitations on the available information. The ERT completed its field work in March-April 2000, circulated a draft report in July-September 2000. There were a substantial number of comments received and the final report was completed in November 2000. The lapse in timing for the production of the final report was the result of scheduling problems on the part of the ERT leader.
- 2.3 Serious limitations on quantitative information exist, and it was not possible to draw conclusions based on statistically-based approaches, for example, on the impact of the NCS on improvements in river water quality. Furthermore, because the NCS is only one of several influences on environmental and other outcomes, it is difficult to definitively point to its role in some successes. This point is raised as a criticism of the entire process by some individuals from Pakistani institutions in comments they provided concerning the draft report. It is important to recognize that this issue is a problem in most umbrella-style guidance initiatives wherever they are done, especially when there is not good baseline data available at the start, or a control case (i.e. what would the condition of Pakistan's environment be now if there had been no NCS).
- 2.4 The ERT is confident that it has been able to address key issues in a reasonable fashion, and that the conclusions and recommendations are solid. The range of interviews, focus groups, document reviews, etc., provide a surprisingly strong convergence around certain key points. This is not to say that we expect unanimous support for all aspects of our findings and suggestions. Indeed, there are a variety of strong opinions about the future development of the NCS. Ultimately it will be up to the many actors involved in NCS to determine how the observations of the report can best be implemented nationally and at more local levels. Thus we have not tried to be totally prescriptive at any point in the report—there is more than one pathway to sustainability. Furthermore, while we illustrate progress and problems with many examples, there are many more that have not been discussed. It would be impossible, even in a report of twice the length of this document to do full justice to the interviews, background reports and range of experience of a decade of planning and implementation of the NCS. We hope that by bringing together ideas based on

¹² MELGRD. Pakistan National Conservation Strategy, the Mid Term Review: A Process Overview. March 2000.

rich and thoughtful inputs of many people and organisations; solid ground has been prepared for future plans.

2.5 The organization of this report is in seven chapters plus nine annexes. In addition we have provided an Executive Summary and Prospectus that can be used as a stand-alone document that considers implications of the recommendations. Chapter 1 makes the case for a sustainable development approach for the future—and highlights why this should not be postponed for financial or other reasons. The current Chapter outlines the evolution of the NCS, and considers why it was such an advanced approach in relation to other initiatives domestically and internationally. Chapter 2 also outlines the analytical approach of the review and various constraints. Chapter 3 assesses the impacts of the NCS between 1992-2000 in relation to key issues such as creating the space for conservation and environment, awarenessraising, institutional development and potential outcomes. In Chapter 4 the financing and management of the NCS is reviewed, including a focus on new financing approaches, and on strengthening leadership both within and outside of government. Chapter 5 reviews the dynamic context of both national and international factors likely to affect further implementation of the NCS. Chapter 6 considers important needs for moving forward with a renewed approach for the NCS. The report concludes with five key lessons learned and six major recommendations, all outlined in Chapter 7.

NCS Context 1980-2000

2.6 The Pakistan NCS is one of the best-known national conservation strategies, externally admired for its vision and potential at the time it was adopted. It was developed in response to the World Conservation Strategy (WCS) launched by IUCN in 1980. The WCS was one of the first global initiatives to highlight sustainable development. The NCS emerged after almost a decade of discussion and analysis, and was adopted at the highest levels within the government of Pakistan. It was highly attractive to donors, especially in the period after the Earth Summit, when sustainable development awareness percolated into the programs of development agencies. Key events during the formulation and implementation periods are noted in Box 1.

Early Implementation Perspectives

2.7 David Runnalls¹⁵ in a 1995 review (Box 2) concluded that the NCS

"Goes much further than that of any of the much acclaimed Green Plans of the OECD countries. It goes further than the National Conservation Strategies of other developing countries. Pakistan has set itself a formidable challenge...It is not surprising that its implementation is difficult, uneven, and time consuming. For it requires not only changes in the institutions of government and in the way policy is formulated; it also requires fundamental changes in the way people think about their relationships to the natural environment and to such fundamental issues as social equity and the elimination of poverty."

¹³ The WCS was produced in revised form in 1991. *Caring for the Earth: A Strategy for Sustainable Living*. IUCN/UNEP/WWF, Gland.

¹⁴ IUCN and the Government of Pakistan. 1992. *National Conservation Strategy*. 451 pages.

¹⁵ Runnalls, D. 1995. *The Story of Pakistan's NCS*. IUCN-Pakistan.

2.8 The implementation plan within the original NCS document, and a follow-up 1993 document focuses on budgets for individual programs, in order to garner donor support and to demonstrate practical results. As Runnalls noted: "In a perverse way this may also turn out to be one of the document's weaknesses. For it shifts the focus to the familiar terrain of project preparation and approval...and away from the fundamental shifts in the structure of public institutions and macroeconomic policy implied by the main arguments of the document."

Box 1. NCS Development and Implementation 1980-2000.

Pertinent milestones for the Pakistan NCS included:

- A nine year gestation (1983-92): leading to a strategy unprecedented in the country's history for its comprehensive nature and focus on conservation as a critical component of development. Initial request to IUCN from government came in 1983. NCS adopted in 1992.
- A focus on government leadership and consultation: the NCS document was prepared with the assistance of a secretariat established in 1988 over a 3 year period under supervision of the Deputy Chairman of the Planning Commission, one of Pakistan' most powerful bureaucrats. It involved more than 3000 people through workshops and other consultations.
- Three operating principles were established: achieving greater public partnership
 in development and management; merging environment and economics in
 decision making; focusing on durable improvements in the quality of life of
 Pakistanis.
- Government spending on natural resource management and efficiency of resource use was to increase: from 4% of national investment to 8% by 2000.
- Seven level strategy for implementation: federal and provincial leadership; departmental responsibility; district coordination; community participation; individual action; corporate tasks; government and NGO support.
- 1993-98 Plan of Action: was presented via a Cabinet-level Implementation Committee to Pakistan donor consortium in 1993. 14 core areas (see Annexes 1 and 5 of this report) plus four cross-cutting areas for immediate action: institutional strengthening (technical, regulatory and participatory); supportive framework of regulations and economic incentives; broad-based communications for public awareness; project implementation in priority areas.
- NCS attracted external funding from the start: IBRD began environment project identification in 1985, leading to EPRCP which ran from 1992 to 1999 in support of capacity development within government. The World Bank agreed to accept NCS in place of a NEAP. PEP partnership established with funded by CIDA in 1995 (CIDA and UNDP largely funded the NCS preparation process.) Other donors responded by increasing emphasis on environmental portfolio.

Box 2. Early Lessons Learned about NCS Development and Implementation. (Runnalls, 1995. The Story of Pakistan's NCS)

Why did the Strategy work initially? Indigenous process that penetrated fairly deeply into government, driven by consensus at senior levels, so there was acceptance by all concerned ministries, with signoff; provinces had opportunity for comment; in addition NGOs, mass media, public and private sector all had involvement. A spirit of partnership was fostered; the search process involving

expertise from Pakistan and abroad identified key issues and catalyzed interest and alerted government of serious nature of problems and later participation of Pakistan in Rio Earth Summit as Chair of G77. Key inputs from several outside advisors in early years. Donor agencies backed a process rather than a project. Insistence on quality, especially on the part of some support organizations such as IUCN.

Preliminary lessons learned (to 1994-95). NCS is a political document that should facilitate the Strategy's acceptance by the economic community and to protect government implementers from the rest of the bureacracy. NCS should be a SD strategy (it already enjoyed the support of some Pakistani finance ministers). SD requires major institutional change for its implementation, not only within government—create and develop new institutions, revise and strengthen existing ones, and create linkages among federal departments and between federal government and provincial and local governments. Process is at least as important as the final product. Implementation plan largely about capacity building. Outside organizations must be sensitive to the indigenous nature of the process. Outside consultants should be chosen well and used sparingly.

Linkages: Environmental Sustainability, Economic Growth, and Poverty Reduction

- 2.9 Clearly for the NCS to be effective as a sustainable development strategy, it had to deal effectively with the linkage of poverty reduction, wealth generation that can actually benefit the poor, and environmental sustainability. How can environment contribute to 'pro poor growth' and 'pro poor human development'? In two ways:
- By avoiding or mitigating the health and productivity impacts of pollution caused by an array of factors, chief among them: (1) air emissions, particularly in the large cities, from traffic, industrial sources, and homes, with a high incidence of respiratory problems; (2) water contamination causing high morbidity and mortality from water-born diseases (e.g., diarrhoea, hepatitis, and typhoid); (3) inadequate management of hazardous chemicals used in both industry and agriculture; (4) inadequate solid waste management; (5) inadequate hygiene practices and food quality standards; (6) substandard housing conditions; and (vii) inadequate safety, hygiene, and labour practices in the work place.
- By reducing the occurrence and impacts of natural resource degradation, and by improving conservation for economic development and livelihoods opportunities of the poor. The intensification of agricultural production (particularly in the Indus Basin), through irrigation, increases in both yield and area under cultivation, has led to increases in production and food supply. However, this has been accompanied by increased salinity and soil degradation, riverine deforestation and mangrove destruction, as well as decline in biodiversity, fish resources, and water quality impairment from agro-chemicals. Future economic development opportunities will be constrained if the degradation of the natural resource base continues unchecked. Meanwhile population and consumption continues to grow rapidly and poverty is not being reduced. This growth further exacerbates land degradation, deforestation, marine and coastal degradation, as well as urban and industrial pollution. It is this double-pronged set of problems that create a vicious circle of lost opportunity and degradation that can and should be addressed.
- 2.10 A second key question is how can environmental sustainability contribute to economic growth?

- By including environmental considerations in macro-economic and sectoral policies and the associated incentive structures, gradually it should be possible to move away from a situation where every signal is to 'cut and run' today, because it may not be accessible tomorrow. To avoid this race to the bottom in terms of sustainability means 'levelling playing fields' in a fashion that reduces corrupt forest practices, unfair water allocation, and makes cleaner energy sources more available, while making it more difficult to access low quality fuels. Policies that foster the adoption within Pakistan of internationally accepted environment and resource management practice—a 'race to the top'—also helps economic development by attracting progressive businesses that can transfer environmentally-sound technologies and by providing a greater access to environmentally-conscious markets in the USA and Europe in particular.
- By ensuring consistency and continuity in the environment-economy policy relationship, the tendency can be avoided of people taking advantage of situations that they believe will not be enforceable, or will change over the longer-term.
- By providing safeguards for clean growth the population of Pakistan will become healthier, more productive and therefore better contributors. The existing air and water pollution problems are contributing significantly to poor health, with the greatest ill effects likely being experienced by the poor. As well, through better management of ecosystems and through improved urban planning, the risk attached to natural resource hazards such as floods, drought, and windstorms can be significantly reduced, with lower losses to productivity and less need for emergency measures.
- 2.11 We stress these types of linkages from the beginning, and return to them throughout the report. For they are the foundation on which the future of the NCS and of sustainable development in Pakistan depends.

NCS Focus during Implementation

- 2.12 Examination of the NCS through a lens focusing on the triple needs of the environment, the poor and of economic development clearly shows that the NCS:
- was largely focused on achieving environmental outcomes (centred around ecosystem integrity);
- policy focus was geared towards environmental institutions and very weak on macro-economic and sectoral policies;
- 'incentives' focus was mainly on regulation and 'command and control' type approaches, and very weak on economic instruments;
- lacked prioritisation, as evidenced by the absence of any form of evaluation of costs and benefits and fiscal implications, except in the most general terms; and
- clearly did not address poverty reduction—the most fundamental of the core development issues—as directly as it might have.

Thus the NCS became a largely environmental guidebook (similar to the more conventional National Environmental Action Plans) with a large "shopping list" of needs at all levels rather than serving as an implementable strategy for *institutional transformation* towards sustainability. In Table 2 we summarize where NCS appears to have placed greater or lesser emphasis in addressing environment-economy and environment-poverty concerns.

Table 2. NCS Relative Emphasis on Environmental, Social and Economic Areas.

Key linkages between environmental sustainability and economic growth	Key linkages between environmental sustainability and poverty reduction
NCS focused more on:	NCS focused more on:
Safeguards for internalizing the cost of environmental degradation: NEQS EIAS Monitoring and enforcement Strengthening of environmental institutions Mass awareness NCS focused less on: Macro-economic and sectoral economic policies: Economic Pricing (water, energy) Pollution taxes * Removal of env. damaging subsidies (agriculture, oil and gas)	Safeguarding the country's natural resource base, with the implicit assumption that this would lead to a better quality of life for all Pakistanis in the long-run. NCS focused less (and not directly) on: Health outcomes (through clean water and air, hygiene, housing, and education) Livelihood outcomes (through sustainable management of natural resources) Prevention/mitigation of environmental risks and economic shocks Empowerment and social capital
 User charges and cost recovery Energy sector reforms 	development
 Agric. and forest sector reforms (taxation, land distribution and renegotiated rights and responsibilities, irrigation policy) * initiative awaiting implementation 	

How the NCS was to be Implemented

- 2.13 The initial Cabinet Committee for NCS Implementation was established in March 1992. It included the Minister for Environment as convenor, the Minister for Finance and Economic Affairs, the Minister for Education, the Minister for Science and Technology, the Minister for Food and Agriculture, the Minister of State for Cooperatives and Forestry, the Deputy Chairman, Planning Commission, Secretary General, Finance and Revenue Divisions, Secretary, Finance Division, Secretary, Environment and Urban Affairs Division, and the Additional Secretary, Inter-Provincial Coordination. Unfortunately this cabinet committee only ever met twice. It can be revitalized and updated in terms of membership, since the concept was good. A NCS Coordination Unit was established to provide the secretariat support for implementation.
- 2.14 The main approach to NCS implementation was to be via four partnerships: government and NGO (for NGO capacity building), government and private sector (regulations and incentives), within the government (among agencies and federal-provincial for institution building), and a mass awareness campaign to link government and the public at large. An important move was the development of the

Pakistan Environmental Programme (PEP), launched in July 1994, aiming to build capacity of four institutions—the NCS Unit of MELGRD, the Environment Section at the Planning and Development Division within the Planning Commission, the Sustainable Development Policy Institute (SDPI) and the World Conservation Union IUCN-Pakistan Program. PEP, funded by CIDA, and rather thoroughly reviewed at various times¹⁶ has endured and is currently the essential, albeit imperfect mechanism, for NCS coordination. A second major project was the Environment Protection and Resource Conservation (EPRC) Project funded by the World Bank and implemented through MELGRD. The EPRC not only focused on institutional development but also undertook some pilot natural resource management projects.

2.15 In a 1993 plan of action prepared for a donor coordination meeting laying out the five-year plan priorities¹⁷, it was suggested that a financial outlay of Rs. 19.234 billion, exclusive of on-going water management, forest management, sewage and several other environmental programs, would be required. As much as 82 % of the overall allocation was to be spent on provincial governments and special areas, 16 % on federal agencies and 2.6 % on an NGO support fund. The allocation by subject area was to be 38% for pollution prevention and control including urban waste management, 10% forestry and plantations, 10% watershed protection, biodiversity conservation 9%, with 33% shared among the other nine core areas. This plan became the main implementing document for the NCS, not updated since.

Constraints on Environmental Action during NCS Implementation

- 2.16 The extent of environment and sustainability neglect, and continued poor performance of environmental institutions can be attributed to four major constraints:
- Lack of political commitment and weak governance. Despite the NCS framework
 for sustainable natural resource management and environmental protection
 (which was prepared in a uniquely consultative way prior to being adopted by the
 Cabinet), and input through a number of donor-funded initiatives, environmental
 considerations are still not fully integrated into the country's economic growth and
 poverty reduction plans.
- Weak institutional capacity. Despite important progress in establishing a
 regulatory capacity and environmental institutions both at the federal and
 provincial level (updated environmental legislation provides for delegation of
 monitoring and enforcement powers at the provincial level), this institutional
 apparatus will remain largely ineffective, as long as the country does not have:
 - i the necessary human resource capacity and incentives for implementation;
 - ii a credible monitoring and enforcement system;
 - iii a sustainable funding mechanism (based on "cost recovery" and the "polluter-pays-principle"); and
 - iv a process of engaging the public through information disclosure, education and mass awareness programs, and participatory mechanisms.
- Weak policy framework. This is reflected in:
 - i inadequate valuation of resources (e.g., water, energy);

¹⁶ e.g. Simon Miles, B.D. Bell, Tariq Qurashi, and Athar Ali Khan. 1998. *Pakistan Environment Programme. Mid-term Review Report.* CIDA.

¹⁷ Government of Pakistan. January 1993. *The Pakistan National Conservation Strategy. Plan of Action. 1993-98.* 81 pp.

- ii little or no influence on sectoral policies (e.g., energy, urban, transport, agriculture, irrigation, forestry, health, and education), and import/export policies;
- iii weak understanding of linkages between environment and poverty outcomes; and
- iv limited forums and processes for debate, learning action on sustainable development.
- Weak fiscal management and resource mobilization. Despite a provision in the 1997 Environmental Act for instituting a "pollution charge" for industrial effluent, and provincial "sustainable development funds", no broad based policies are in place for promoting cost recovery, re-use and re-cycling, user charges (e.g. from nature tourism and National Parks), and environmental fees and taxes. Consequently, environmental agencies are necessarily dependent on very slim budgetary transfers and continuously seek donor funding (e.g. from CIDA, SDC, GTZ, ADB, EU, UNDP, and World Bank).
- 2.17 These observations need to be tempered somewhat by the recognition that over this past decade, for the first time environmental issues have been extensively debated alongside other development and economic concerns.
- 2.18 All of the constraints relate to the overall issue of a crisis in governance within Pakistan that unfolded and worsened over the decade. It was certainly not an easy time to be introducing ideas as bold and inclusive as those of the NCS. Underlying the problems of governance are basic constraints such as a society still partly under feudal arrangements with weak government-civil society relations and subject to corruption.

General Analytical Framework for the NCS Review

- 2.19 The NCS conceptualization emerged in the late 1980's in a context within Pakistan of massive poverty, severe environmental degradation, lack of awareness, and extremely limited institutional capacity to deal with environmental issues. The NCS's highly participatory and inclusive approach was in many ways futuristic. However, with three major and overlapping objectives¹⁸, 14 core areas with a number of cross-cutting issues, and no less than 60 clusters of outcomes (most of which had specific quantitative targets associated with them) within 68 programs, NCS was inherently complex. But it appeared to lack four fundamental ingredients: (1) a clear enough implementation road map, (2) a monitoring system geared towards evaluating tangible changes in the behavior of institutions and environmental quality on the ground, (3) a system of accountability for outcomes, and (4) a multistakeholder process for keeping an overview of the NCS, learning and enriching it. These four points occupied the MTR to a considerable extent.
- 2.20 NCS's implementation was stifled by its weight and ambitiousness. In addition, there were weaknesses in appraising and providing mitigating measures for risks associated with achievement of objectives (e.g., macro-economic factors and constraints to resource mobilization, political will on the part of decision-makers) and implementation capacity. These were reflected in the lack of an evaluation and monitoring system and the lack of capacity and flexibility to learn and adapt—adjusting course and targets as appropriate. The points raised in these two

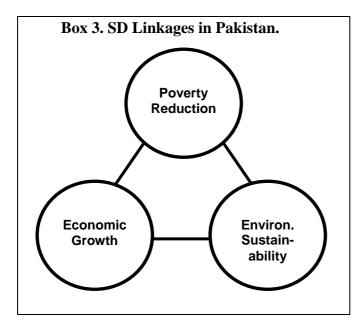
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 $^{^{18}}$ (1) conservation of natural resources, (2) sustainable development, and (3) improved efficiency in the use and management of these resources.

paragraphs are reviewed in more detail later in this report. They are introduced here because they had an important impact on the capacity of the ERT to fully address the MTR TOR, as noted below.

Evaluation Criteria

- 2.21 The MTR itself was complex, and was based on equally ambitious terms of reference (reflective of NCS complexity). It became clear to the ERT that a detailed analysis, and evaluation of the specific objectives of the 14 core areas in quantitative terms was neither feasible, nor appropriate in light of the information base. Thus the ETR decided to adopt three evaluation criteria:
- A simple sustainable development framework against which to assess achievement of the stated objectives of the NCS. This framework (Box 3) allows development objectives to be characterized in terms of three types of outcomes and the linkages between them: (1) economic growth; (2) poverty reduction and social development; and (3) environmental sustainability. Many of the traditional development efforts have focused on achieving poverty reduction and social well-being through economic growth. Less attention has been paid to the linkages between environmental sustainability and economic growth on the one hand, and environmental sustainability and poverty reduction, on the other. Therefore much less is known about the nature of these linkages. This 'critical triangle' of development outcomes is by no means a panacea. But it represents a simple way to start identifying the essential institutional and policy linkages that need to be at the core of the country's sustainable development agenda.
- A qualitative rather than quantitative assessment of the 60 outcome groups of NCS. In this case, because of the paucity of reliable quantitative information, we have used anecdotal evidence, results of focus group meetings, impressions from site visits, expert opinion and the collective experience of the MTR partners, to piece together an evaluation of outcomes.
- A review of the processes/systems intended to communicate and implement the NCS. This review is based largely on institutional analysis derived from interviews inside and outside of government, with limited comparisons based on experience internationally.



MTR Analysis Approach

- 2.22 The analysis draws primarily from documented case studies of on-the-ground experiences of different approaches and projects over the past 10 years, and from extensive focus group consultations, and individual interviews about progress and problems. In addition, a number of implementation sites throughout the country were carefully selected through desk studies and interviews in order to identify a representative range of the different delivery approaches (i.e. 'institutional models' or 'institutional arrangements') that had been piloted across the different regions and sectors. The overall MTR approach (detailed in Annex 1) consisted of:
- Preparation of background studies and assessments. Nine studies were commissioned, covering a range of stakeholder consultations and crosscutting issues. These were carried out from October 1999-April 2000. In addition, PEP partners and the World Bank contributed evaluations of their programs. The studies are listed in Annex 4.
- Desk study. During the desk study, information was collected from studies, reports, books and articles related to the sectors covered under NCS. In addition to this initial review, discussions were held with relevant central-level stakeholders, local line agencies, and NGOs to seek additional information.
- Consultations and focus group discussions. In addition to the MTR public
 consultations held in various parts of the country in late 1999, discussions were
 held by the ERT with relevant stakeholders, national and local agencies of
 government, and other key informants. The final list of institutions and people
 consulted and cases is presented in Annex 5. The institutional arrangements
 observed are discussed in Chapters 3 and 4.
- Field visits. Field visits in March-April 2000 by members of the ERT consisted of visits to provinces and territories to investigate the state of provincial conservation strategies and to visit selected projects, with interviews to collect detailed information and evaluations. However, it is important to note that, except for a few cases, field visits were targeted to key informants, and not beneficiaries directly. The field visits are noted in Annex 6.
- Validation workshop. A national multi-sectoral meeting, attended by more than 80 participants, was convened in mid-April 2000 by the Minister of MELGRD to share initial findings and recommendations of the MTR and obtain stakeholder feedback.
- Feedback from Draft Report. More than two dozen individuals and organizations
 provided comments and observations on the draft report circulated from July to
 September. Many of the comments sketched out elements for future directions in
 addition to corrections and observations about the conclusions and
 recommendations.
- 2.23 The information gathered through the background reports, desk studies and field visits was synthesized to identify the roles, responsibilities and relationships of key actors in NCS implementation, and to consider the extent to which outcomes had been achieved. It is important to note that no systematic review or analysis of the individual 14 core areas and associated 68 programs was conducted since that task proved beyond the capacity of information and time available to the ERT.

2.24 The ambitious terms of reference for the MTR included a matrix with seven key outcome areas and eleven core processes/systems (Annex 3). This was to guide the overall effort, especially with respect to performance evaluation. While the matrix was useful for general organization of the MTR's efforts and findings, it was never intended for quantitative measurement of performance. Furthermore, there are some important missing elements. The ERT has used the matrix as general guidance, so that comments concerning the core processes/systems are found in the text of the MTR report. But the performance of the NCS is considered largely in qualitative rather than quantitative terms, derived from inputs from the stakeholders and the material pieced together from a wide variety of sources, including information provided by the NCS Unit in the course of the MTR.

Constraints and Limitations in Conducting the Review

- 2.25 The MTR faced a number of challenges over the year-long implementation. Indeed, combined with the time taken to organize the MTR, it was an extraordinarily long and quite complex undertaking. The intent of the MTR is certainly to provide a high quality, serious examination of NCS performance. We believe this has been achieved—but even more might be achieved if lessons learned from this review can be applied for future record-keeping, continuous review and evaluations. The following constraints and limitations therefore deserve attention.
- 2.26 The approach of having a MTR Coordinator (Maheen Zehra) appointed within government throughout the process was an excellent idea. Having the individual seconded from one of the cooperating partners (IUCN-Pakistan) was useful to all parties, but it was not without operational issues.
- 2.27 The management of the process involved "weaving a cloth combining a complex mix of players, interests, competing sectors, federal and provincial government departments." This process was essential for building consensus on the purpose of the MTR and for addressing the varying perceptions and interests of key actors, including the PEP partners, donors, etc. It was hindered by the limited culture for a consultation approach within the government and, at various times, by the cumbersome governmental rules of business. In a sense the MTR had to rekindle the spirit of participation and inquiry that had characterized the formulation of the NCS—overcoming inertia and educating many of the actors who were new to the NCS.
- 2.28 Missing from the initial effort was the ERT, which was appointed much later in the process. The MTR Coordinator believes that, had the ERT been involved in the early stage of the process to provide design inputs, many of the operational and methodological issues could have been resolved more quickly; the MTR might then have been completed in half to two-thirds of the time from its start in June 1999.
- 2.29 There is also an issue regarding the varying quality of the background studies prepared as part of the review. Several organizations were involved in the contracting and conduct of the studies. The work was carried out with quite limited financial resources. Some studies were valuable; a few provided only limited insight.
- 2.30 The most significant limitations centre around two matters. The first is simply the lack of reliable environmental and other information. This is commented upon in various parts of the report. It is a problem made worse by the long period spanned by the review, which makes it difficult to assemble reliable information. The second matter is the lack of much direct consultation with beneficiaries throughout the MTR.

The opinion sampling of people likely to be affected by NCS implementation is not well developed across the wide range of program areas.

It has been pointed out to the ERT that rarely are comprehensive strategies in Pakistan subject to such thorough review as this one. Thus the inherent challenges are in a sense even more regrettable since it is impossible to be as quantitative or as definitive in many of the observations as would be desired. It is encouraging that the GoP, other PEP partners, and NCS implementation are so commitment to the review and to the use of the resulting product.