

**PAKISTAN'S NATIONAL  
CONSERVATION STRATEGY:  
RENEWING COMMITMENT  
TO ACTION**

**Report of the Mid-Term Review**

by

Arthur J. Hanson  
Stephen Bass  
Aziz Bouzaher  
Ghulam M. Samdani  
with the assistance of  
Maheen Zehra

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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 3. NCS IMPACTS 1992 – 2000

3.1 This chapter presents the bulk of findings about NCS performance. We have divided the chapter into seven sections. The first is an overview of how the NCS fits into the *political economy of environment and development/conservation* concerns within Pakistan. This is important for, as noted in the 1993 NCS action plan, the NCS had already “begun to shape our very approach to governmental decision making...away from direct administration and towards partnership.” The second is *awareness raising*. Third is the critical issue of *institutional development*, including capacity-building, within the three sectors. Fourth is examination of *outcomes* (not simply outputs) arising from the commitments of this past decade. This is, of course, a difficult but essential element of the review. Fifth, a review of how gender integration has occurred in both programmatic and institutional terms. Sixth, a summary of *views arising from public consultations* is included for comparison with the observations derived in other ways. And, seventh, the subject of *Monitoring, Reporting and Evaluation* (MRE) is examined. Taken together, these sections characterize the NCS today and lead us to think about what might be desirable in the future.

### NCS and the Political Economy of Conservation in Pakistan

#### *Creating New Space and Coalescing Agendas.*

3.2 While the first phase of NCS action has not produced many tangible outcomes where the environment is demonstrably improved, or sustainable development implemented, it has led to successes in certain areas, and especially in creating institutions and awareness as well as a platform for policy debate and formulation. Within government, perhaps the main achievement of the NCS is the development of a policy framework, including the 1997 Pakistan Environmental Protection Act (PEPA)<sup>19</sup>, the designing of the national environmental quality standards (NEQSs) through a consensus building process, the agreement to levy a pollution charge on industry (thus giving substance to the “polluter-pays-principle”), the establishment of environmental tribunals, the formalization of the rights of citizens to protect collective environmental rights through the judicial system, and a framework for providing fiscal stimulus to environmental activities. This process has helped to enhance mass awareness of environmental issues, which is demonstrable at various levels of society.

3.3 The working relationships between Pakistan and the international community were strengthened in the preparatory period leading up to UNCED and afterwards. The preparation of the national report for UNCED involved unprecedented cooperation between government and civil society, as did the follow-up action on the conventions, especially the CBD signing and the biodiversity action plan produced afterwards. Undoubtedly these activities were aided by the working relationships established during preparations for, and later, during implementation of the NCS.

3.4 The NCS process opened up a new space outside of the one traditionally occupied by a coalition of feudal lords, powerful elites, and the government bureaucracy. The coming together of a number of groups of widely varying business, development,

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<sup>19</sup> PEPA is the acronym for *An Act to Provide for the Protection, Conservation, Rehabilitation, and Improvement of the Environment, for the Prevention and Control of Pollution, and Promotion of Sustainable Development* (Act No. XXIV of 1997).

social and governance interests around the environmental agenda, has created a sense of goodwill and partnership between government agencies, the private sector, and the independent sector. While this would not have been possible without an injection of external direct financial support to the government by donors, the drive towards such action came mostly from the independent sector and built on change agents within the government wherever they were available. Indeed, the institutional structures of the independent sector—including transparency, inquiry, cooperation, participation, and continuity—were a key factor in opening up a new type of space between the government and its citizens.

3.5 Despite failed, and, in retrospect, over-ambitious expectations in terms of a projected doubling of environmental investment (expected to reach 1.7 percent of GDP), the practical significance of the NCS document is not exclusively in terms of its stated quantitative goals. Rather, it lies in the framework it provided, the baseline information that was collected under its auspices, the model of participatory strategy development it introduced, and the network of stakeholders it mobilized. In addition, the implementation of the NCS helped create and strengthen key institutions, and thus provided an opening for subsequent initiatives.

### ***The Role of Policy Communities<sup>20</sup> in Shaping NCS in the Future***

3.6 Since conservation cannot succeed without political will and strong stakeholder support, the NCS process should continue its effort to generate strong political support. This would happen only if the environmental programs speak to the socio-economic agendas of the country—which are represented by many powerful networks. These networks include (1) economic and trade liberalization networks, consisting almost exclusively of economists and business interests promoting market solutions; (2) the poverty eradication network which is united around community empowerment, development and institution building; (3) the agriculture network which consists of agronomists united by the green revolution's promise of dramatic yield increases; (4) the energy network, united for a long time around the unrealised potential of hydro power; (5) the urban agenda network, united almost exclusively by the vision of real estate development; and (6) the international NGOs and donor networks which combine a multitude of visions, ranging from pure conservation, social transformation, development effectiveness, and opening up markets and business opportunities. By and large most of these networks still operate at cross-purposes much of the time, with limited consideration of sustainable development.

3.6 NCS experience so far has shown that the community development and conservation/environmental NGOs, which form the backbone of the environmental and sustainable development policy network, still have a major role to play in bridging the gaps with other powerful policy community networks. This should become one of the stated core objectives of the NCS, and not an incidental one. Mainstreaming the environment and focusing on the links between economic growth, poverty eradication and human development would help bridge many of the gaps between the environmental agenda and the goals of the more traditional and powerful policy

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<sup>20</sup> “A policy community is defined as a network of individuals and institutions with interest and expertise in a particular area, and therefore a stake in the process of decision making regarding that area. It is based on the idea that policy-making is not a monolithic exercise located in one ministry or agency. It involves cooperation between governmental agencies—environment, finance, commerce, foreign affairs, energy, and agriculture—as well as non-government entities—NGOs, business associations, media groups. The decision making process invariably reflects the relative political influence of these groups and involves political negotiations and compromises between them.” (Banuri and Khan 2000).

communities. Over time the outcome should be developing synergies between different programmatic objectives, strengthening of the environmental policy community, and improving resource mobilization and overall effectiveness for sustainable development.

## **Awareness Raising**

3.7 The NCS has created awareness about environmental protection and management needs, and, to a lesser extent, about ways in which environment and economy link, and about social impacts of environmental damage. The basis for these observations comes from interviews in the major sectors, monitoring of media stories, past evaluations of organizations influential in the implementation of the NCS, and actual instances of environmental action, including advocacy campaigns. Many of those consulted during the MTR consider awareness raising to be the single most important achievement of the NCS. It is also pointed out, however, that the NCS was not alone in creating this awareness. The expanded interest of the international community and of global media certainly would have raised the profile of environment and sustainable development to some extent even in the absence of the NCS. And other organizations such as the Family Planning Association of Pakistan take messages about environmental health and sanitation to local villages quite independently of any connection to the NCS.

3.8 Unfortunately there are no reliable surveys of how far the NCS has penetrated at the community level, nor of which messages are being absorbed by either rural or urban populations. Thus the basis for building mass awareness campaigns is quite weakly developed, and a strategy for national environmental education is lacking.<sup>21</sup> Some environmental awareness activities in Pakistan do not profess a connection with the NCS, although their objectives are in line. Government units such as the forest and wildlife divisions do not directly refer to the NCS when justifying their work.

3.9 Bailly, in its review of mass awareness conducted for the NCS, observed that “behavioural change does not just *support* the NCS environmental awareness campaigns—it *is* the NCS.” This comment should be kept in mind, for it succinctly expresses an important message. Without significant behavioural shifts within institutions and on the part of individuals, the objectives of the NCS will never be fully addressed. In Box 4 key findings from the Hagler Bailly report are summarized. They reveal a situation where there is limited appreciation of the range of tools available for mass awareness and a disconnect between this theme and the limited efforts for environmental education within schools. There is also a suggestion based on monitoring of media clippings by SDPI that environmental stories peaked in 1997 and have dropped some 30% in frequency since. To some extent these observations follow patterns in other countries, where public interest peaked just before the 1992 Earth Summit.

**Box 4. Development of Mass Awareness through the NCS.  
(Mass Awareness Initiatives – Hagler Bailly Final Report NCS MTR)**

*Five key objectives:* Help civil society develop environmental awareness; basic environmental knowledge and role of people; how to anticipate, avoid and solve environmental problems; develop ability to contribute and evaluate environmental

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<sup>21</sup> See Hagler Bailly Pakistan. March, 2000. *Mass Awareness Initiatives. Final Report.* MTR NCS.

policies, measures and programs, develop sense of urgency leading to direct participation in appropriate action.

*NCS focus:* Communications strategy and environmental education with “systemic support for effecting behavioral change” rather than reactive publicized solutions to environmental problems.

*Was there an environmental education strategy?* Despite several efforts, basically no. “Environmental education is not considered part of the continuum of mass awareness that begins with communications and ends with environmental education. As this basic concept was never explained explicitly, in the NCS or any other document, mass awareness has become synonymous with communicating via the mass media only.” Private sector schools (52-54% of students) have been ignored within GoP environmental education but organizations such as IUCN and WWF are working with them.

*Curriculum development:* Approach in NCS is “revise, restructure and update” with a focus on existing curricula. The curriculum of the formal education sector is so rigidly defined that environmental education has been unable to penetrate it fully, although there are some signs of changes, especially in some regions. Pilot material development projects have been developed within the Ministry of Education. Environmental education has been included in the Postgraduate Teaching Certificate and Certificate of Teaching curricula. ‘General Science’ in the future will be termed Environmental Education. In NWFP and the NAs there is active work on curriculum development.

*Mass awareness:*

- At least 35 awareness raising campaigns on specific issues have been undertaken nationally or locally by government or civil society organizations.
- National level campaigns were undertaken by the NCS and through MELGRD, the latter with considerable EPRC financial support. In both cases, while useful materials were developed, there was lack of coordination and of continuity since they were project activities with a fixed life span.
- Mass awareness and education initiatives are in various stages of development and implementation in provinces even where there is no PCS but there is a definite value arising from the efforts in those areas with a conservation strategy process.
- WWF plays an important role in all media and in on the ground resource centres.
- Role of communications officers and environmental information centres (IUCN, SDPI are extremely important.)
- Frontier Forum of Environmental Journalists (FFEJ); Journalists Resource Centre (JRC) formed in 1988, tries to use Urdu press, radio and TV (JRC became the communications unit of IUCN-P.)
- NCS Bulletin became *The Way Ahead* with investigative reporting on SD issues.
- Monitoring of SDPI environmental press clippings revealed that number of stories peaked in 1997 and has dropped at least 30% since.
- Houbara Bustard Campaign to stop foreigners hunting a bird designated under CITES but permitted by Ministry of Foreign Affairs is the “effort is the closest that Pakistan has come to a systematic awareness-raising program.” Also, the Kirthar National Park Highway Campaign – “first instance where the pressure of civil society forced the government to rethink its options and modify a project against its will.”

*What works (and doesn't):* Communications training could focus on communication as a process: drawing, photography, puppetry, and street theatre; plus advanced themes such as TV production. Radio is the key mechanism for reaching most people. Non-traditional: *ulemas* and *jirga*, already acted upon in SPCS: *hujra* (daily meeting of men); *godar* (area where women gather). A major weakness of SPCS (like the NCS) is that it was difficult to get government to take full ownership of a communications strategy. SPCS, however, has long list of interesting short-term mass-awareness goals that could serve as a source of ideas and experience for others.

3.10 The Communications Strategy originally designed by the NCS is now redundant and lacks ownership. This strategy should be revised in light of the NCS Unit's experience with mass awareness and, more importantly, using the research conducted to devise the provincial strategies' communications component. A round table comprising stakeholders from the government, NGOs, and civil society should be formed to review the existing environmental education and communications strategies. There is a need for tangible objectives, and for examining policy changes. A policy example is the need to create more Urdu language materials. In order to assess behavioural change as a result of mass awareness drives, a market survey needs to be carried out. Without this, it will not be able to measure future achievements.

3.11 It also should be pointed out that there has been remarkably little use of awards and competitions as positive incentives for behavioural change and awareness-building. Cost for such initiatives could be met from a number of sources, including private sector firms, membership-driven NGOs and governments. Other incentives are, of course, required, and these need to be backstopped or put in place through enabling policies.

3.12 One of the most useful mechanisms for encouraging a high level of interest on the part of the media has been the support services provided to journalists and NGOs via the Sarhad Provincial Conservation Strategy (SPCS). One of the challenges for the SPCS has been to help its constituency to grow outside the government system, as well as within it. Both the Frontier Forum for Environmental Journalists (FFEJ) and the Frontier Resource Centre for NGOs and community-based organizations have been given considerable strategic boosts by the SPCS. FFEJ holds courses for journalists in the province to familiarize them with environmental issues (for which the journalists pay) and is resulting in an increasing body of stories. The Urdu press in particular is being targeted. The FRC offers training, research and documentation and networking services, with a concentration on practical local SD. Importantly, it offers NGOs something other than money. The work of these support services, plus the round tables in the NWFP (see Potential Success Stories later in this chapter), is building up expectations of government-civil society partnerships in decision-making, and expectations of improved transparency—which will help to drive the SPCS and increase the level of sustainable development awareness.

## **Shaping Institutions in Government, Civil Society and the Private Sector**

### ***Pre-NCS Institutional Framework: A Brief Overview***

3.13 Prior to the launching of the NCS, Pakistan lacked adequate institutional infrastructure required for implementing a comprehensive environmental policy and diverse programs. Ideally, federal and provincial governments should play a central role in formulating/designing/mainstreaming appropriate policies and programs, in mobilizing and allocating financial resources and by providing an enabling environment. In the absence of strong institutions, GOP's role in the past had been rather weak: marked by incoherent and sporadic efforts with very little impact. The role of the private sector in addressing environmental issues was dismal, and very few NGOs had the wherewithal to play an effective role in this area. The weak institutional base in Pakistan posed innumerable obstacles in the way of promoting sustainable development.

### ***NCS Institutional Vision***

3.14 In discussing the agenda for action and the implementation strategy, NCS envisaged:

“An institutional development plan, to assign individuals responsibility for taking action. These individuals and agencies must exist and be capable of taking action, if not, they must be created. Sustainable development is a new paradigm, requiring action on previously neglected environmental and collective issues. Hence institutional development is necessary. A monitoring and evaluation plan, to allow on-going and periodic assessment of progress.”

The NCS called for the strengthening of the existing institutions through capacity building and creation of new ones where necessary. It recommended improved collaboration and coordination among key relevant institutions.

3.15 The NCS underscored the importance of recruiting trained personnel for various key areas that were suffering from the shortage of requisite skills such as:

- technical staff to assess and monitor emission controls;
- trained extension staff with government and NGO;
- a cadre of environmental social scientists, including economists;
- primary scientific research staff; and
- well-trained administrative professionals who combined organizational efficiency with technical knowledge.

GOP and donor support was established to address these capacity building needs.

3.16 Recognition of the pivotal role of governmental, non-governmental and private sector institutions in the implementation was certainly an essential element of the NCS. Indeed this recognition of support from all three sectors was almost revolutionary in the extent of cooperation demanded of organizations. In the next section further details of the NCS vision for these three sectors are provided in Boxes 5 to 7, and an outline of actual performance.



## ***Institutional Shaping 1992-2000***

### Public Sector (Box 5)

3.17 The performance of the national governmental institutions can be summarized very succinctly: the institutions were set up as anticipated but they are not functioning well.<sup>22</sup> In this section we examine some of the problems that have emerged with key implementing bodies at the national level (and in the case of the EPAs, also at a provincial level). There are other issues that are not treated here, including relationships among government units, leadership failures at the cabinet level, and provincial action. These points will be discussed at a later point in this chapter.

- The NCS Unit was established soon after the adoption of the NCS but it failed to carry out the rather ambitious tasks assigned to it for various reasons. The observed weaknesses are:
  - Position within a ministry with relatively weak influence to date (MELGRD);
  - No real powers other than “persuasion”;
  - Burden of administrative work—the Joint Secretary is also JS Administration;
  - No clear monitoring mandate, and yet the NCS should have been learning from pilot activities, and evolving to deal with emerging trends;
  - Short-term staff, with rapid turnover (5 Joint Secretaries in 8 years) – but who have been given a long-term responsibility (the NCS having a long time horizon);
  - Contract staff who do not know the government system well – and yet are supposed to influence many parts of government, federal and provincial;
  - Mainly generalists on staff, who therefore cannot engage with technical people from other bodies;
  - Small size of staff – in relation to the large scope of NCS activity.

3.18 Largely as a consequence of these constraints, the NCS Unit has not properly communicated its role, promoted the NCS to the provinces, screened development projects for environmental soundness, or given assistance for developing environmental regulations. Indeed, the MTR was the first opportunity for some time for it to get out into the provinces. The NCS Unit is so ill-equipped that many staff seem to have forgotten their mandate. Stakeholders in the BCS, for example, complained that there was inadequate briefing on the NCS contents and approach.

3.19 The Environment Section in the Planning and Development Division was created in 1993. This section has experienced a high turnover rate of its Chief. It faces merger with another section during the on-going “right-sizing” exercise. Recruitment of project funded consultants, slow initially but adequate now, has created a somewhat hostile working environment in the section. Stakeholders within the Government Sector complain that the Section in fact has been a hurdle in the formation and processing of NCS related projects. The expectation that the Section will positively influence annual and national development plans remains under question.

3.20 Federal and Provincial EPAs were already in place prior to the NCS adoption. The 1997 Act assigned EPAs the responsibilities to administer and implement the

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<sup>22</sup> See Tariq Banuri and Shaheen Rafi Khan. 2000. *Environmental Strategy Background Report*. SDPI for MELGRD and World Bank; and Aamir Matin and Aqil Shah. March 2000. *Institutional Development for NCS Implementation*. MTR NCS. UNDP, Pakistan.

provisions of the Act, to prepare national implementation policies for approval by PEPC, implement these approved policies, coordinate environmental policies and programs nationally and internationally, promote public education and ensure the enforcement of the National Environment Quality Standards.

3.21 A number of donor assisted projects have attempted to strengthen the institutional capacity of both the Federal and provincial EPAs (in particular the World Bank EPRC Project) through providing professional/support staff and providing physical facilities and equipment etc., but the EPAs continue to face numerous challenges including: the issues of the regularization of their staff, shortage of funds for recurring expenses etc. EPA responsibilities are greater than their capacity to deliver, and they are mired with various organizational and structural issues, and low political commitment. On the other hand, unlike views about the NCS Unit, there is still a strong hope expressed by many people that the potential roles envisioned for the EPAs still can be achieved.

#### Private Sector (Box 6)

3.22 The Environment Technology Programme exists to promote the use of environmentally safe technologies for the production of environmentally safe products by Pakistan's manufacturing/industrial sector. This program is the key private sector component of the NCS, operated via the Pakistan Chamber of Commerce network. It emphasizes the adoption of measures for pollution abatement, waste management and recycling, chemical recovery, more efficient utilization of natural/economic resources, production and installation of instrumentation and control systems for utilizing the more efficient and environmentally safe production technologies. A mutually supportive relationship between industry, government, and research institutes seems to be developing slowly but with growing expectations for concrete results. More needs to be learned from where the private sector has adopted sustainable practices *spontaneously*—learning the lessons of effective policy and market signals that match with producer motivations.

#### NGOs and Community Organizations (Box 7)

3.23 SDPI was established in 1992 to serve as a source of expertise and advisory services for government, private sector and non-governmental initiatives in support of the NCS. Now, SDPI is facilitating the flow of international institutional knowledge and research on sustainable development into Pakistan in addition to contributing research on key public interests/policy/SD issues. SDPI has become a productive training ground for Pakistani analysts and experts and has undertaken several projects in the program areas recommended by the NCS, including the initial thrust of developing the environmental technology approach described above. SDPI needs to be made more effective through focusing its resources on selected core issues. It is certainly a success story in the making, with a substantial audience for its advice within and outside government, a growing international audience and collaborators.

3.24 IUCN-Pakistan is an older institution with international origins. The Pakistani organization was established in 1985 with the initial purpose of assisting the GOP in the development of the NCS. It played a pivotal coordinating role in the formation of the NCS and, more recently, has reoriented its project approach to a program approach. IUCN-P in the post-NCS period has expanded perhaps tenfold in terms of staff, funding, projects and programs. Its implementation portfolio has enlarged and geographical coverage enlarged. IUCN has actively assisted the development of provincial conservation strategies in the NWFP, Balochistan and Northern areas. Under PEP, six IUCN-P units have received support for institutional strengthening.

IUCN-P now possesses very considerable management expertise and specialist skills and contributes to the annual and national development plans and provides technical expertise to many units within federal and several provincial governments. Throughout the NCS process, IUCN-P has proven itself to be a valuable networker, facilitator, convenor, and more recently, deliverer of field activities.

#### **Box 5. NCS Vision for the Government and Its Impact**

The institutional development at the federal and provincial level entailed:

- Building a capacity to review major policies and large projects for environmental impacts, and some capacity to anticipate and mitigate them through policy revision or project redesign.
- The ability to establish authentically the conservation prices of critical resources, and some capacity to move towards those prices.

The capacity to enhance resource allocation to priority NCS core areas and develop a system for rational and stable resource sharing with local governments and NGOs.

The steps were to include:

- Creation of an NCS Unit in the Environment and Urban Affairs Division (EUAD) now the MELGRD to act as staff agency to the Pakistan Environment Protection Council (PEPC) and secretariat to the Pakistan Environmental Protection Agency (PEPA).
- Creation of an Environment Section in the Planning Commission, with linked cells in provincial planning and development departments (P&Ds) to facilitate development and conservation of the environment and to meet the need for environment-economic policy analyses that could be integrated into policy-making. These units were mandated to establish natural resource and environmental targets; scrutinize policies and programs of natural resource sustainability and environmental soundness and to participate in the annual and five-year planning processes of the government and promote environmentally sustainable development in sectors of the economy.
- Other Ministries and Divisions: focal points.
- The Provincial EPAs were to be strengthened for enhancing their environmental impact assessment capacities. In addition, their capacity building for effective collaboration with local governments in small industry waste collection and treatment and with provincial traffic police to control vehicular emissions was proposed.
- AJK and Northern Areas: Environment Departments, Environment Sections in Planning and Development Department and EPAS.
- The NCS Unit in the EUAD was entrusted with critical regulatory (and evaluation) the NCS in capital and revenue budgets, collaboration with other ministries in framing of environment regulations, plus screening of development projects for environmental soundness.
- Incremental installation of environmental analysts, first in resource-related Ministries, and then in Ministries overseeing large infrastructure projects. The EUAD along with provincial EPAs was charged with the establishment of standards for emission levels, licensing and policing existing industry to ensure environmentally compatible discharge standards and the overall development and maintenance of the capacity to monitor and assess the quality of Pakistan's environment.
- Enhanced inter-agency collaboration involving the Cabinet, Establishment and Management Services Divisions, along with provincial (S&GADs) and

management consultants—to review external relationship protocols of involved agencies, making coordination/collaboration routine.

- The NCS envisaged institutional strengthening for increased inter-agency collaboration through two mechanisms: first, strengthening the external relationship protocols of each agency and second, strengthening and reorienting the existing coordination forums. Both approaches were to be followed simultaneously to achieve efficient, equitable and sustainable development.

#### **Box 6. NCS Vision for the Private Sector.**

The NCS envisaged the institutional development in the private sector through the creation of the capability in the leadership and consultative forums of organized industry and trade to identify, seek policy support for, and implement environmentally benign industrial processes, and to promote environmentally compatible products. The corporate sector was expected to play a role in emission standards setting and in the formulation of goal-oriented regulations for their enforcement. Numerous senior government-industry round tables were envisaged. NCS required industry to establish environmental committees in local chambers of commerce and their federations in order to encourage compliance with emission standards by members and to cooperate with local governments in pollution abatement and environmental clean-ups.

#### **Box 7. NCS Vision for NGOs and Community Organizations.**

It was recognized that 9 out of 14 NCS program areas relied on community organizations for their implementation, while a tenth (supporting institutions for common resources) could only be implemented by community organizations, supported by catalytic agencies. This entailed carefully working out the institutional arrangements by which the catalytic agents were supported:

- NGOs registered under the laws of Pakistan were to be supported by federal, provincial and local governments to aid in the creation of grassroots institutions for common resources issues.
- Community participation programs were to be facilitated by government departments, supported by the grassroots institutions.
- Establishment of an independent and non-profit research Institute for independent analysis and advice on the implementation of NCS at Islamabad - the Sustainable Development Institute.

It was envisaged that a common set of arrangements for the release of funds and evaluation of performance would be followed for both the NGOs and for the community participatory programs.

3.25 NGOs and Civil Society have taken the NCS as an opportunity and many of their initiatives derive strength from the Strategy. This is true of various community development organizations as well as for environmental and conservation bodies. Some, for example Sungi, have overtly focused on the NCS. They have emerged as advocates for environment and conservation. Some CBOs have undertaken impressive projects e.g., solid waste collection and disposal, involving the

community. The Pakistan NGO Forum, with five coalition forums, is a commendable effort of NGOs and CBOs providing collaboration in the provinces.

### ***More Effective Institutional Performance is Needed***

3.26 The weakness of government performance at all levels, but especially at the federal level was highlighted repeatedly in both review reports and in interviews. Action is urgently needed. The signal being sent by government is exactly the opposite of what is needed. For example, in the private sector focus group, government's "non-facilitative attitude" was highlighted as the second-most important constraint after lack of financial resources.

3.27 This attitude is perceived to include "lack of commitment, willingness or ability to undertake, support or promote environment-friendly initiatives." It was noted that "government industries continue to dump their chemical waste on the Grand Trunk Road and elsewhere, setting a bad example, and providing proof of their lack of commitment to environment...Government ministries delay work, by their bureaucratic red tapism, and any sanction from the government takes time...Government has not provided the incentives promised to industry." The fear is expressed that implementation of NEQS could open yet another area of corruption. These views are serious, for there is ample evidence around the world that private sector action is not likely unless government sends appropriate signals and creates an enabling situation for innovation and investment. And without concerted action by industry, cleaner production will not take place.

3.28 The starting point for improvement should be reorganization within the MELGRD, and other federal institutions. It is beyond the scope of this Report to provide a full road map for needed changes. But we provide two important examples here where improvements might be made, and more recommendations in Chapter 7:

- The NCS Unit in MELGRD has been unable to perform its task effectively for a number of reasons, including continuity in leadership and access to sufficient professional staff. To more effectively undertake coordination responsibilities and meaningful MRE, a Policy, Planning and Evaluation (PP&E) Section should be created within the Ministry under a Director General, but with direct links to the Secretary. This Section should be staffed by professionals in relevant sustainable development fields. Professional staff from the existing NCS Unit should be brought to the PP&E Section and new professional staff recruited, as required. Staff incentives should be strongly geared to performance in coordination and facilitation. Like other parts of the government, the NCS unit suffers from short tenure of staff at any particular job.
- The Environment Section in the Planning and Development Section has been functioning under "stop-gap" arrangements. Continuity has been missing; instead there are frequent "adjustments." Recruitment Rules of the Environment Section have been approved. Regular professionals should be inducted into this Section as quickly as possible to continue building capacity there. The Section should retain its independent existence and not be made part of restructuring.

### **Assessing Outcomes**

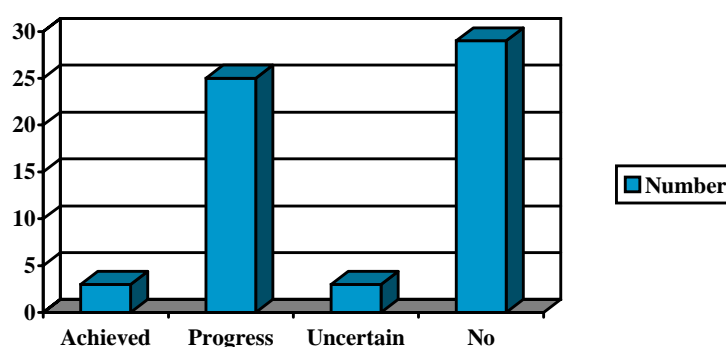
3.29 The NCS has had sufficient time for implementation so that it is fair to consider outcomes and impacts rather than focus on inputs, outputs, or indeed the processes that it has used. But the NCS document is hardly clear on this subject

because timelines in some cases are very long (to 2021 for example) and with some degree of confusion between output and outcome. As already indicated, it is difficult to get the kind of quantitative and objective information that would provide adequate assessment. In this section we focus on four key approaches to assessing progress towards improvements in the relationships of environment, economy and social well-being. The first is our subjective review of 60 outcomes (labelled as outputs in the NCS document). Secondly, we have identified, and briefly discuss, interesting potential success stories that we believe are at the cutting edge of what can be accomplished within the umbrella of the NCS. The role of provincial and district conservation strategies is the third area for review. And finally, the important issue of gender integration within conservation strategies is examined.

**ERT Subjective Assessment of NCS Program Outcomes/Outputs**

3.30 In Chapter 10 of the NCS a series of tables (10.1 to 10.14) provide quite detailed targets about what was expected to be accomplished via the NCS under the various program areas. In some cases the targets have been quantified, with expected results to be achieved by 2001. Mid-way through the ERT mission, team members, assisted by the MTR Coordinator, developed a simple scoring of whether the targets are likely to be met by 2001. While this assessment is subjective, we have confidence in it, and provide the full results in Annex 7. A summary of the results is provided in Box 8. The graph shows that few targets are expected to be achieved fully, while progress will be made on almost half. But for the largest number (29 of 60) little or no progress has been made. This observation among others has led the ERT to pose the apt question regarding NCS progress, “is the glass half-empty, or half-full?” We shall return to this question at a point later in the report. Successes appear biased towards natural resource conservation, with little progress concerning pollution and waste.

**Box 8. Progress in Achieving NCS Outputs Originally Anticipated by 2001.**



NCS CORE AREAS	ACHIEVED	PROGRESS	UNCERTAIN	NO/LITTLE PROGRESS	NUMBER OF OUTPUTS ASSESSED*
1 Soil		1		6	7
2 Irrigation		3	1		4
3 Watersheds		2			2
4 Forests		3			3
5 Rangelands		2		2	4
6 Water/Fish		2		2	4
7 Biodiversity		7	1	2	10
8 Energy Effic		2	1	2	5

9 Renewables		2		3	5
10 Pollution	1			6	7
11 Waste				4	4
12 Commons	1				1
13 Population	1			1	2
14 Heritage		1		1	2
<b>TOTALS</b>	<b>3</b>	<b>25</b>	<b>3</b>	<b>29</b>	<b>60</b>

(\* See Annex 7 in this report and Tables 10.1 to 10.14 in the NCS for further information on specific targets within each of the 14 core areas.)

### **Potential Success Stories**

3.31 Through a combination of ERT field visits, focus groups, interviews and background information it was possible to identify a number of potential success stories of activities related to NCS themes at various levels: national, regional and local. We use the word “potential” because each is still at an early stage of demonstrating its full value in relation to sustainable development. Some undoubtedly will become models for replication in other settings, or become more fully developed. We are encouraged by the progress of each. There are other cases for possible inclusion that we have not described. So far no one in Pakistan has developed either criteria for, or an actual inventory of success stories. We strongly urge that this be done through the PEP partners.

3.32 It should be emphasized that the various stories are not totally unrelated “islands of success”. They are part of national processes that have been stimulated by the presence of the NCES. They will influence the future of sustainable development directions by their example, and, likely, the future course of the NCS itself.

#### National

3.33 *Environmental Technology Programme for Industry (ETPI)* promotes the use of environmentally safe technologies for the production of environmentally safe products by Pakistan’s manufacturing/industrial sector. It is a joint project of the Federation of Pakistan Chambers of Commerce and Industry (FPCCI) and the Government of the Netherlands. In phase I (1996-1999), 18 environmental audits of selected industrial units from leather, sugar, textile, paper or pulp, fertilizer and edible oil and ghee sectors have been conducted to identify their environmental problems. Of these, 8 industrial units have been selected as National Demonstration Project (NDPU) and their action plans prepared. Environmental solutions in terms of cleaner production technologies, in-house improvements and end-of-pipe treatments have been designed and implemented. The program aims to comply with NEQS and ISO 14000; carry forward to action NCS recommendations; and identify improved process technologies. To come are environmental audits of other industrial sectors: steel, petrochemicals, industrial chemicals, pesticides and insecticides, dyes and pigments, cement, food processing, dairy, automobiles and polyester fibre and yarn sectors.

3.34 *SDPI: Opening policy dialogue space.* The development of SDPI is one of the success stories that may be most directly attributed to the NCS. It is a driver of ideas, opening “space” for discussions that were previously very difficult to undertake within Pakistan. Its research is not abstract but is attached to advocacy and training functions. These functions have helped it to build a reputation as the environmental “leader” amongst development research institutions in Pakistan, with considerable

convening power. There is still more “intellectual push” from SDPI than there is a “demand pull” from government. And there is still a need to develop a continuous-improvement “cyclical” policy approach that commissions and considers research and then adapts accordingly. However, because of the lack of this, SDPI is adept at identifying the ‘leverage points’ for change within the government system. If SDPI has had to work on the outside more than it wished, this may explain several observations that it has now taken up too much of an adversarial position with government—critiquing loudly rather than working with all parties to explore and train for SD. A comprehensive report prepared by SDPI has documented its contribution to the NCS core areas.<sup>23</sup>

3.35 *NEQS: Basis for effective pollution regulation.* The point is made repeatedly by those dealing with pollution control that, if you can’t measure it, it doesn’t count in decision-making. The other side of this observation is that, if there are no effective standards, then pollution measures are meaningless. The need is more complex because standards should be related to specific industries and become an important element for enabling regulations, in this case for the 1997 Act. The National Environmental Quality Standards (NEQS) have been developed to meet these requirements for effective pollution control. They were defined in 1993 with little public consultation, and revised further in 1995 and 1999. Both new and existing industries were to be in compliance by 1 July 1996. This has not happened—not an unusual initial outcome if experience during early stages is compared with other countries.

3.36 There is need for an action plan for NEQS finalization for specific industries, and for their promulgation and implementation. It requires attention not only to the standards themselves, but also to certification of laboratories, self-monitoring and enforcement. There is a need for agreement with provinces, industries, and with municipalities on phasing of implementation. The NEQS will play an essential role in relation to the planned system of pollution charges. PEPA is responsible for their management and implementation and PEPC approves revisions. While widespread violation of the NEQS is still the rule rather than the exception, they have provided an important signal to industry that change will be necessary. It is an important lever to have these standards in place. The challenge now is finding effective mechanisms for implementation.

3.37 *SDNP: Using the Internet for human sustainable development communication, awareness raising and problem-solving.* The information revolution accompanying the establishment of the World Wide Web and introduction of e-mail could only be successful within countries if there was good connectivity available at a reasonable cost. Most organizations required a shift in corporate culture in order to make the transformation. In 1992 the Sustainable Development Networking Programme (SDNP) was established through UNDP support. SDNP quickly became the country’s leading advocate for maintaining Internet access under reasonable financial terms, and established the early networks. It is reasonable to say that it pioneered the pathway to electronic information networking within Pakistan, especially for development organizations. SDNP presents much potential as a communication tool about NCS objectives and implementation.

3.38 The large private sector Internet service provider (ISP) capacity has drawn attention away from SDNP’s original roles. Now SDNP is beginning to concentrate on how to ensure better access to information on sustainable human development, for

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<sup>23</sup> SDPI. April 2000. *Report for the National Conservation Strategy MTR. SDPI’s Contribution to NCS Core Areas: an Overview.*



example, by creating a major web site relevant to Pakistan's needs, and by building a within-Pakistan Internet backbone that will reduce the costs of purchasing expensive international bandwidth. In the process SDNP is seeking to become financially self-sufficient through the sale of various services. None of this is easy, particularly since there are formidable obstacles to reaching out to client groups who live well away from established data-ready telecommunication systems and who are hampered by low literacy rates and poverty. Thus SDNP, judged a great success for what it has already done in creating awareness and actual connectivity, faces a future where it must re-invent itself in a fashion that will serve sustainable development information needs in a much more distributed way. Its future role could be an extremely valuable adjunct to the devolution initiative now underway, and also to backstop state of environment reporting and other information dissemination needs of MELGRD, of other units of government and of civil society and business organizations.

3.39 *Compressed Natural Gas (CNG): Pilot efforts to introduce a clean fuel source.* The operation of Pakistan's fleet of trucks, buses and smaller vehicles such as motorized rickshaws contribute to heavy air pollution in cities and along crowded motorways. The problem is made worse by the import of cheap rebuilt engines for vehicles, lack of maintenance and inspection of vehicles, use of leaded fuel, and the import of low quality fuels. There are few examples of improvements in this situation. One is the vehicle emissions-testing laboratory established in Peshawar; another is the vehicular tune-up program of the National Energy Conservation Centre. However the only vehicular emission standard currently prescribed by EPA is for carbon monoxide.

3.40 A longer-term win-win approach will be to convert more vehicles to compressed natural gas. This fuel source is abundant within Pakistan, thus reducing the need for imported fuel, has a much lower level of harmful emissions, and should be a cheaper source for vehicle operators. There are several constraints to its widespread use: feasibility and cost of conversion, development of service facilities throughout the country, some safety factors in relation to use, and the inertia involved in any major transformation.

3.41 There are several promising initiatives underway, driven by various government units. These include the provision of a network of CNG refuelling stations (currently more than 60 with as many more under construction) strategically placed within cities and along major roadways. Secondly, there are individual federal and provincial initiatives. The Hydrocarbon Development Institute of Pakistan hopes to have 150,000 vehicles converted by mid-2000. In Lahore and Quetta there are pilot projects for equipping motorized rickshaws with conversion kits so that the engines can run on CNG. Over the coming five years much progress should be expected on the use of CNG, not only for vehicles but also in domestic and commercial uses. All of this is consistent with projections in the NCS. Indeed, it is one of the few themes within the NCS where an established target (network of filling stations) will be exceeded by 2001. But it is important that the transformation be done on an economically-sound basis, with minimum dependence on new subsidies.

### Regional

3.42 *Sindh: Orangi Welfare Project (Trust).* A community based solid waste management project by OWP in partnership with Karachi District Municipal Corporation West (DMC West) was launched in 1998. The street sweeping and collection as well as disposal of household waste in the community bins were assigned to the OWP. DMC West took on the responsibility of keeping the roads

clean and collection of waste from central waste bins. The OWP was delegated the responsibility to organize, mobilize and administer the activities at community level. OWP organized the people by establishing working groups at street level and assigned them the responsibility of keeping their area clean. Neighborhood infrastructure is being maintained via individual assessments into a common pool. This effort has led to numerous other initiatives as a consequence of the trust-building that has taken place, including development of reasonably-priced schools, plus water, electricity and gas connections earlier denied. The community, once labeled as violent, is now a more peaceful area. Additional opportunities for vocational training and for awareness-building on key issues such as women's health are on the horizon through this cooperation of government and community.

3.43 *Balochistan: Conservation and sustainable use of biodiversity in Torghar, Killa Saifullah District.* The mountains of northern Balochistan were once rich in wildlife, and held significant populations of Straight-horned Markhor, Afghan Urial, Leopard and Balochistan Black Bear. Uncontrolled hunting, exacerbated by the surplus of cheap automatic weapons related to the Afghan civil war, caused some of these populations to be either wiped out or at the verge of extinction by the mid eighties. The late Nawab Taimur Shah Jomezai, tribal chief of Torghar area requested initiation of a conservation plan that has become very community-oriented, with technical assistance from US institutions.

3.44 The plan was very simple and pragmatic. It proposed that all existing hunting by both locals and outsiders be stopped. A small number of game guards were to be selected from the tribesmen. It was decided that the programme would be funded through the proceeds generated by a controlled limited trophy hunting of Afghan Urial, primarily by foreign hunters. The controlled trophy hunting of animals was a critical component of the plan and had two key objectives: to generate sufficient revenue to underwrite a game guard programme and to create a strong linkage between the abundance of urial and markhor populations and economic well being of the local people. In 1994, the Torghar Conservation Project was converted into an NGO and was registered as the Society for Torghar Environmental Protection (STEP). The result has been: elimination of poaching; enhancement of local income; and awareness raising.

3.45 *Northern Areas and NWFP: Mountain Areas Conservancy Project.* Through a remarkable coalition of communities, government organizations, NGOs such as IUCN-Pakistan and WWF, and donors such as GEF and UNDP, ecological integrity issues are starting to be addressed in four large 'conservation areas', two within NWFP and two within the NA. The objectives are to protect watersheds and important biodiversity elements within whole valleys, while building economic opportunity for people in local communities. The effort builds on models pioneered through AKRSP, but extends this effort to include decision-making up to the district level. Past programs have empowered village level institutions and created self-financing mechanisms. Conservation issues include the use of upper rangelands in the surrounding mountains, protection of endangered wildlife such as ibex, markhor and snow leopard, utilization and conservation of wild plants, local water resource development, park management and ecotourism in areas of traditional grazing and hunting activities. At the district level, conservation committees are being established to begin addressing a host of complex issues related to allocation of hunting licenses among communities, given that animals migrate; access to pastures; practical matters related to wildlife management, technical issues such as GIS use, and conflict resolution.

3.46 *Punjab: Kasur tanneries project.* This is an important case demonstrating what can be done for cleaner production when real demand, commitment, funding and management can be linked. All four elements are essential. Some 230 family-owned tanneries are concentrated within one large site, where about 15,000 people live and work. There are some 300,000 people living in the vicinity. Apparently, there is a high rate of cancers and other diseases. The tannery site is surrounded by artificial lagoons receiving untreated tannery wastes, including chromium salts. These lagoons drain into an irrigation drainage channel, eventually finding its way to a main river. Demand for improvement came directly from tannery operators. The cost of improvements is over USD10 million. After a poor start, tight deadlines, good community and government liaison, an experienced manager and external technical reviews (the project is being implemented via UNIDO) have combined to produce remarkable progress in the development of the necessary pre-treatment and treatment facilities for the lagoon wastes. In addition, a chromium recycling facility is being built within the tannery site. And the contaminated lagoon sites are being drained, rehabilitated and eventually may be returned to agricultural use. The system should be functional later this year. The Kasur tanneries project is becoming a model of interest to other tannery operators in Pakistan. Over time various cost recoveries will be introduced to make the operation as financially self-reliant as possible.

3.47 *NWFP: Round Tables and Focal Points.* While the 'fora' associated with the NCS effectively disbanded after its formal approval, under the SPCS *separate round tables (RTs)* have been set up for agriculture, industries, urban environment, environmental education, culture and tourism, NGOs and communications. This opening up of debate has allowed RT members to treat the SPCS tactically, subject to real demands and events, identifying issues that count, and neglecting those that they think do not count. As such, RTs hold promise for a strategic approach of regular debate, mobilizing networks, action and review. RTs have already provided a nexus for the various policy communities connected to SD to come together. They have influenced projects and information flows, as yet they have not really impacted on policy. However, there is no overall round table – the agenda has been disaggregated into set 'core areas' which may not all be of equal priority, and which need to be brought back together occasionally to sort out learning and new priorities. As yet, RTs have not met in the field to discuss real issues. Experience in other countries shows this can be the best way to share understandings and perceptions.

3.48 The SPCS introduced the promising concept of conservation strategy *focal points* within government. These are 'insider' posts within the various departments. Some are government staff, while others are IUCN staff. They link the various departments concerned to the SPCS Support Unit and to the relevant RTs (each focal point's technical agenda more or less corresponds to one of the RT themes). The job of the focal points is to gain intelligence as to the plans and progress of the various departments, and to use expert and persuasion powers (and occasionally links to donors) to encourage a greater mainstreaming of environmental concerns. The counterpart is senior—the Additional Secretary. This is a simple way of trying to improve links, but it is certainly improving information flows and many focal points are gaining respect. There is a need for focal points, or other mechanisms, to maintain better links with the federal level.

### ***Provincial and District Conservation Strategies***

3.49 The 'cutting edge' innovations described immediately above derive from the Sarhad Provincial Conservation Strategy (SPCS). The NCS recommended that the detailed debate, planning and implementation of NCS recommendations at provincial levels should be through participatory provincial strategies. However, the hope of

having in place a second tier of conservation strategies covering all provinces and areas of Pakistan has not been realized fully to date. This has not been for lack of effort. It was a goal that depended upon a great deal of cooperation and political willingness that varied considerably among the different parts of the country. It would appear that the larger and more mature the governance situation, the more difficult is the process. Thus the two provinces where the concept has so far failed to catch hold have been the largest in terms of both population, cities and administrative complexity: Sindh and the Punjab. By far the most advanced model is the SPCS in the NWFP, prepared in 1996 and now well into its implementation. The Balochistan Conservation Strategy is close to the implementation stage. It will face major challenges since it is very ambitious, complex and will operate within a highly traditional setting facing huge development challenges. The proposed conservation strategy for the Northern Areas is at an earlier stage, with extensive consultations on approach still underway. It appears to have considerable cross-sectoral support, although perhaps lacking in high-level bureaucratic interest. Initial dialogue is taking place in AJK. A useful summary of constraints and opportunities in the development of provincial conservation strategies is provided by Haroon Ayub Khan in a background report prepared for the MTR.<sup>24</sup>

3.50 Also of interest, especially given the current decentralization focus of government, are various experiments in district level conservation, particularly the Chitral and Abbotabad Conservation Strategies in the NWFP. Finally, it is somewhat surprising that little effort or progress appears to have been spent on building urban conservation strategies. Only Peshawar is formally included within a provincial strategy (and a local Agenda 21 is planned for this city).

#### Sarhad Conservation Strategy

3.51 NWFP is an instructive case to examine. It has been a 'frontier' province in many ways for conservation strategies. The record is impressive. NWFP has undertaken the first:

- formal response to the NCS (the Chief Minister requesting a formal briefing in 1991);
- provincial conservation strategy;
- round tables (informed by the Canadian model);
- district conservation strategies (DCSs) – in Chitral and Abbotabad;
- draft provincial Environmental Protection Act;
- attempt to define 'indicators for sustainability' to measure progress;
- concepts for SD Funds; and
- the first liaison attempts between a PCS and private sector/DFIs.

3.52 Thus much experience in conservation strategies has accrued over time, in the order NCS, then SPCS, and now via the DCSs. While the NCS process within government has effectively stopped learning due to its very weak management at the centre, there is certainly continued learning through the SPCS and DCSs. It is IUCN-Pakistan, and to a lesser extent, the other PEP partners and some foreign donors, that are actively monitoring that learning.

3.53 Two basic questions were examined in relation to the link between the NCS and the SPCS:

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<sup>24</sup> Haroon Ayub Khan. March 2000. *A Review of Provincial and District Conservation Strategies*. NCS MTR study prepared for MELGRD.

- What have been the impacts of the NCS on NWFP?
- What lessons can we learn from the SPCS/DCS processes that could be useful in design for a future NCS, including making it useful for stimulating further provincial or more local action?

3.54 In essence, the original NCS led to broad awareness and paved the way to participatory policy and planning in the NWFP. It is still occasionally referred to in speeches and seminars. The SPCS process started off with considerable support, due largely to the NCS and charismatic high-level NCS ‘champions’. But subsequent changes in attitude and investment have been attributed to the SPCS – not the NCS. There has been almost no subsequent use of the NCS document, or communication between the NCS Unit and NWFP PE&D. Even though the Unit is invited to SPCS round tables, it does not even reply. The impacts of the NCS are now felt through the SPCS. This leads to a view that the SPCS ‘translated’ the NCS for NWFP—and in response to the second question above, “why do we need to go back to the original ‘language’?”

3.55 There are certain lessons of the SPCS/DCS processes that NWFP stakeholders believe should be brought to bear on the next phase of the NCS. The principal lessons are institutional. SPCS implementation efforts include an attempt to create a better performing institutional landscape through establishing linkages especially via stakeholder round tables and via focal point officers representing conservation strategy knowledge and interests within departments. These two elements have been described in the NWFP Potential Success Story discussed earlier in the Chapter.

3.56 A revised NCS may in fact have value to the NWFP if it can help in the development of a *system* for continuously improving attention and policy on environmental matters. It would include expert support from federal and international levels to the NWFP and other provinces and departments, particularly in information and in understanding and approving projects, plus handling macroeconomic and international issues.

3.57 Future NCS implementation might also pay more attention to fostering learning between provinces: A useful idea from IUCN-Pakistan has been their own Strategies Support Panel to help learn from the various conservation strategies. There is a proposal that this should include the progressive construction of a ‘tool kit’ manual of proven approaches. The approach might be extended to all conservation strategy actors, not just IUCN-Pakistan.

3.58 Where interests may converge in a most significant fashion is around the need to develop better local governance. This need has been articulated forcefully by the current national government and it is a responsibility that will have to be reflected both federally and provincially, with a strong bottom-up approach and an enabling framework at the top tiers of government. Thus the two district conservation strategies initiated in the NWFP will provide experience valuable to the entire conservation strategy system. At present both are in an early stage of implementation and, not unexpectedly perhaps, are facing difficulties.

3.59 A major problem for the DCS in the NWFP is that there is no strong, client-oriented local administration with which to work. This also applies to the various line departments at district level, which should be responding to local stakeholders. On the other hand, the deputy commissioners, who have an integrated mandate, have been supportive of the DCSs. It has been difficult to tackle more than two district

strategies. The prospects of running 22 DCSs simultaneously in NWFP are way beyond the current capabilities. Local institutional strengthening should be a strong element in any revised approach to the NCS and provincial strategies.

3.60 Another area of potentially general consideration is the need to recognize and balance strategic and comprehensive approaches. While the PSDN has “sampled” districts, covering less than 10 per cent of them, on an issues basis it is attempting to cover almost everything. It is trying to take a lead on nine ‘core areas’ through round tables and demonstration projects. This approach is too comprehensive. Being spread too thin means that few results on the ground are achieved, leading to frustration. It means that no one really gets to grips with the issue of tradeoffs and priorities. It means that monitoring is difficult and almost anything could be done in the name of the SPCS, including possibly damaging approaches. There are possible solutions:

- An umbrella round table could focus on identifying and ‘managing’ the top few themes;
- Major projects can be encouraged to implement pilot activities on priority themes (e.g. the GTZ/GoNWFP UIEP);
- A provincial ‘state of sustainable development report’ should point to, and investigate, all promising activities, especially spontaneous investments taking place.

3.61 There is also certainly a need to explain more fully, and deal with varying expectations of what is meant by “strategy” and “strategic planning”. Many of the problems of the SPCS and DCS have come from different expectations of how far to go in a strategy. Some (especially those in government) expect detailed designs and budgets. At the DCS level, people merely expect “more of whatever the last project was”, which is usually more infrastructure. Others, especially at the provincial level, emphasize more a “market of ideas” followed by concrete policies and laws only when they have been proven—policy, trials, monitoring and spread of “best practices.” It should be clarified that a strategy is just that—expectations that it is a detailed blueprint for action will be dashed unless there is the local capacity in place to translate strategy to action.

#### Balochistan Conservation Strategy (BCS)

3.62 This strategy is in the process of being formally adopted by the provincial government and has been the subject of many consultations. The document certainly falls into the comprehensive category. Like the NCS and the SPCS it tries to provide a combination of strategy and state of environment reporting. Thus the BCS presents a valuable amount of information. But it might well prove too complex. For example, there are 14 core programs, leading to an incredibly complex implementation matrix (Table 4.3 in the fourth draft of the BCS) that lays out roles and responsibilities. It is hard to imagine that agencies will be able to assimilate, communicate and act upon the amount of prescriptive information presented in this table and other parts of the BCS document. It should be noted that this observation is not a criticism of the information itself. Sustainable development is multi-faceted, with responsibilities and accountability that should be accepted across society. Yet, as was the case with the NCS, a provincial strategy that occupies almost 350 pages of text (all in English), is not very likely to be acted upon with a high degree of accountability.

3.63 The perception of the Balochistan Strategy is that it is driven from the top-down—heavy on concept and ideal approaches rather than focusing on what works

and on possibilities for incremental change. It has, however, been informed by many of the lessons arising from both the NCS and the SPCS. In particular, there is a greater effort to focus on issues of poverty, and on monitoring of progress. It has been pointed out to the ERT that a great deal of community input was received during the preparation of the Strategy.

### Evolution of Other Strategies

3.64 It is very difficult to determine when, or even whether, other provincial strategies will emerge. There are some encouraging signals from both the Punjab and Sindh, but the most realistic view is that action will take place only when there is a strong and sustained desire for it to happen—and so far the signals have been mixed. One may ask whether the lack of a PCS in these two provinces makes a difference? There are two points that stand out. First, it is striking how much interesting and useful experimentation has taken place in the NWFP as a consequence of the SPCS. There may be a payoff of some considerable dimensions during this decade. This is not to say that environmental and sustainability concerns are being ignored totally in Sindh and the Punjab. But there is less coordination and, in the Punjab, a sense of environment serving as a kind of ‘punishment posting’ for senior governmental staff. The second point is simply that, without a coherent set of provincial strategies throughout the country, it will be more difficult for a revitalized NCS to be as effective as it should be. The NCS should be allowed to focus on national and international issues, and on supporting provincial strategies—the latter being driven largely from the provinces.

3.65 The Northern Areas and AJK efforts to develop conservation strategies are interesting and deserve on-going support. In both cases there is interest in learning from the strengths and weaknesses of NCS and the SPCS implementation. They are moving at a deliberately slower pace in order to build strong support, especially, in the case of the Northern Areas, to ensure that community and district level interest is properly built. By the time a Northern Areas strategy is agreed upon, it is anticipated that there will be a solid base of action projects already underway, thus minimizing the problem of producing a reference document that is lacking in implementation capacity. This “dual-track” concept makes a great deal of sense. There should be no sense of complacency, however, for either of the Northern Areas or AJK. It would be wrong to conclude that adequate mainstreaming of conservation strategies within either government or business is by any means certain at this point. The efforts still do not attract sufficient support from senior officials and there is an inadequate funding base to support all desired programs.

3.66 As noted earlier, the main cities throughout Pakistan have no specific conservation strategies to meet their special needs. Indeed, the NCS has a weakly-developed section on sustainable cities. The opportunity to build a coherent strategy for each should be acted upon with a degree of urgency. Urban conservation strategies, or perhaps Local Agenda 21s, should be considered for several of the large cities in Pakistan, initially, Karachi, Lahore, Rawalpindi/Islamabad, and Peshawar.

### Comparing National, Provincial and District Conservation Strategies

3.67 It is intriguing and significant to understand what drives the three levels of strategies, to ask questions about how they should be related in the future, and what more needs to be done to make them perform well in the context of governance reform in Pakistan? These questions will be examined in greater detail within the

concluding section of the report. Here we wish to note several observations that should be kept in mind while reading other sections of the report.

3.68 We have been struck by the extent to which most activities operating at local levels have been demand-driven, while those operating at higher levels, especially at the NCS level, are supply-driven. The NCS deals with a worthy set of concepts that have an influence on the lives of people, but in the complex and abstract way in which they are presented, they represent an abundant *supply* of new thinking that appears to be beyond the grasp of institutions to implement properly. At very local levels, people and local institutions are reasonably clear in what they *demand* in the context of their particular community, household, etc. Pollution control objectives, waste management, clean drinking water, access to irrigation water of sufficient quality and abundance, income from wildlife protection, are examples. At the provincial level there is a mix of practical demands and an extensive supply of theoretical constructs about adequate natural resource and environmental management. This is abundantly clear in both the Sarhad and Balochistan Conservation Strategies.

3.69 These observations have led the ERT to conclude that the closer strategies operate to clients—the people of Pakistan and their local institutions—the more likely they are to reflect actual interest and demand, and therefore the more influential they are likely to be. Of course, there is still a need to have a continuing supply of ideas that may go beyond current demand, but as long as these are so far beyond the capacity and perhaps even interest/knowledge levels of people, it will be difficult to implement them. In essence, this means placing much greater emphasis on development of local level implementation and understanding of demand. It reinforces the need for the whole conservation strategy process to work in ways that are consistent with the government efforts at devolution, and to be able to monitor the demand side of sustainable development as carefully as possible in order to be reasonably certain of current concerns within specific districts and at the community level.

3.70 The ERT also has examined other elements of what is different or missing at the three levels of conservation strategies. This comparison is summarized in Table 3. It reveals three interesting points in addition to the supply/demand issue. One is the flow from conservation principles to developmental priorities in moving from NCS to DCS. Secondly, the NCS still has to deal with macropolicy and international links as a set of concerns that may affect the other two levels. Third, the issue of scale-up and resource mobilization will be huge concerns at the district level, likely with a high degree of provincial intervention for both.

Table 3. How the NCS, SPCS and DCSs Currently Shape Up – and What is Missing.

<b>NCS</b>	<b>Provincial CSs</b>	<b>District CS</b>
Guidelines	Policy/ plan in progress	Plans
1980s/early 1990s concerns	1990s concerns	Current concerns
Intellectual push	Networks freely discussing and promoting SD	Demand pull—for demonstration and action
Natural resource conservation principles	Broad mix of conservation and development issues	Developmental priorities
<b>MISSING STILL?</b> <ul style="list-style-type: none"> <li>• Macroeconomic integration/arguments</li> <li>• International links</li> <li>• Federal policy</li> <li>• Links to PCSs</li> <li>• Information support</li> <li>• Monitoring</li> <li>• Learning and review</li> </ul>	<b>MISSING STILL?</b> <ul style="list-style-type: none"> <li>• Prioritization at an operational level (SPCS is the most advanced in addressing this issue)</li> <li>• Institutional reform</li> <li>• Provincial policy change</li> <li>• Support to private sector</li> </ul>	<b>MISSING STILL?</b> <ul style="list-style-type: none"> <li>• Local governance and institutional capacity</li> <li>• Resource mobilization</li> <li>• Means for scale-up to cover many districts</li> </ul>



## Gender Integration

3.71 Gender considerations should be a part of all elements of any strategy for environment and development. That point of view has been made abundantly clear from experience in various parts of the world and at major international gatherings, including the Earth Summit, the Social Summit and the Beijing Women's Conference. We found very limited evidence that gender integration is taking place within the framework of the NCS. The best evidence is within the NGO community, where there are active research programs, sometimes quite good levels of female staffing, and opportunities for women to take on leadership roles. AKRSP provides one of the best models at the community level. And IUCN-Pakistan at the national level. Within government this same level of integration is simply absent. What is striking is that the topic rarely came up for discussion in interviews unless specifically raised by a member of the review team. The NCS itself does not provide penetrating insights into how gender and sustainable development are related.

3.72 The institutional rules and policies for gender integration within government are either absent or not being adhered to in a convincing fashion. This has many ramifications as to how effective programmatic efforts can be for mainstreaming gender integration, for example, in addressing poverty reduction and in encouraging full participation (female and male) by communities in sustainable development planning and implementation. It also suggests that capacity-building efforts may continue to be biased towards male participation unless there are major changes. It is striking how effective the effort can be outside of government, as noted in the previous paragraph. Thus, institutional models certainly exist within Pakistan to provide guidance.

3.73 A gender and environment workshop was held under the auspices of the MELGRD on April 10, 2000. This meeting summarized many of the gaps and constraints that currently exist within the Ministry (and likely, many other units of government). These appear to fall within four general categories: operational conditions that fail to be sensitive to gender matters; a lack of capacity building efforts; very limited analytical capabilities to measure and monitor the role of gender in environment and development; and lack of government ownership, leading to a perception that it is a donor-driven agenda. The consequence of these constraints is that gender concerns are not finding their way into policies and projects routinely. Nor is gender analysis routinely carried out at the important PC 1 or other project proposal stage.

3.74 There are some promising efforts that provide a sense of opportunity and direction for the future. The community level interventions taking place in the AKRSP-influenced areas provide perhaps the most advanced model, with components related to livelihoods, education and health, and more recently the addition of conservation initiatives. Women in some communities participate in decisions about game conservation and the revenues from trophy hunting. The focus on environmental education by WWF and IUCN-Pakistan focuses attention on gender considerations. This work might well profit by being coupled with initiatives of the Family Planning Association. There is some evidence of gender considerations within the fledgling environmental education efforts of government. This work could and should be more prominent within the overall national effort to enhance female literacy and schooling opportunities. Despite the recognition that rural women in particular pay a heavy price in key activities of daily living (seeking water, firewood and fodder, and cooking with solid fuel), action to address their needs is still unfolding at a slow pace. Finally, within large urban communities, initiatives such as the Orangi Welfare

Project provide a sense of what might be accomplished when drawing upon the strengths of all community members. In particular this requires understanding of the value of women's perceptions, problems, ideas and knowledge base. Unfortunately this level of gender integration appears to be the exception rather than the rule.

3.75 Mainstreaming of gender can be looked at through a number of themes. Those identified at the MELGRD meeting (focused on the needs of this Ministry) are: awareness raising within and outside the Ministry; gender integration at project and program levels; affirmative action and an enabling environment to address operation concerns; resourcing for the gender integration process; and capacity building. These themes, while identified specifically in the context of the Ministry's needs, are of general application and should be brought forward for consideration in NCS activities both within and outside government. It is obvious that gender integration should be given a much more prominent role within all NCS activities, with achievable objectives that can be monitored and reported on. There should be a formal mechanism within the environmental assessment process to address gender integration within projects. Gender should be a prominent component within mass awareness and environmental education and environmental health campaigns.

3.76 Gender analysis should be part of action plans—and performance appraised in the reporting of action, for example in the suggested State of the Environment Report required under PEPA.

## **Public Consultations**

3.77 Six workshops plus a number of meetings with key individuals within federal and provincial governments were held in various regions in late 1999.<sup>25</sup> These produced many observations about not only past NCS performance and achievements but also helpful information on the way ahead. As might be expected from the diverse opinions put forward, many of the observations and suggestions were contradictory. It was not reasonable to do an overall quantitative tabulation of views. Instead a summary table (Box 9) was produced by the MTR Coordinator to bring out the range of views expressed at the meetings. This is organized around physical outcomes of the NCS, comments on process, limitations/gaps, and suggestions for the future. It should be noted that these observations are those from the meetings, not necessarily shared by others (e.g. not everyone would agree that Tarbela represents a successful effort at reforestation of watersheds) and that some topics were not well covered (e.g. gender integration) in the discussions.

3.78 Several of the outcomes highlighted in consultations might be added to those described in our potential success stories. The observations about processes contributing to environmental protection and sustainable development are similar to those noted by the ERT. The list of limitations and implementation gaps is an excellent summary of the shortcomings of progress to date. The 'way ahead' contains no surprises and is helpful reinforcement of conclusions and recommendations to be discussed in this report. The public consultation views summarized in Box 9 therefore are very consistent with, and reinforce the overall findings of the MTR ERT.

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<sup>25</sup> See NCS MTR. March 2000. *The Report on Public Consultation at Federal and Provincial Levels*. MELGRD NCU.

## **Monitoring, Reporting and Evaluation (MRE)**

3.79 Ambitious in scope as the NCS was, and with the complex agenda of 68 programs and additional support components, during its implementation overall monitoring, reporting and evaluation mechanisms have been neglected, although there has been a good monitoring track record with respect to some specific donor-supported projects. Only two overall arrangements can be traced through the NCS document and the MTR process. The first is this mid-term review of NCS, which was to take place in 1997, five years after Cabinet approval of the NCS. The second is the setting of a Cabinet Committee as a part of NCS approval by the Cabinet.

3.80 The Cabinet Committee apparently met only twice in the early 1990s. The proceedings of these meetings are not available. Normally Cabinet Committee meetings, and the detailed materials provided for such meetings, would provide a good mechanism for assessing progress, and a basis for objective deliberations on how to make periodic corrections in direction and implementation.

3.81 An appropriate and effective system of MRE would have provided instruments both for performance evaluation and advice, and for early warning of problems—the basis for mid-course policy and programs adjustment. It also would have served to gradually build within government circles the visibility and clout for the NCS that would have made it a more central guiding strategy, knitting together many of the individual elements and strategies important for sustainable development. Good MRE likely would have changed the prevailing perception of the NCS being a static reference “document” to appreciation of its potential as a dynamic process to improve future economic, ecological and social well-being. Finally, it would have contributed to a culture of transparency and learning.

3.82 The absence of an appropriate MRE system means that a much-needed data base on performance is not available. The current review suffered considerably from this. For example, it was difficult to obtain reliable information on the impact of considerable financial expenditure spent in support of the NCS objectives set out in the original document. It is a monumental task to trace back almost a decade’s expenditure and then determine results.

3.83 The failure to develop a reliable environmental reporting system is another very important example of what happens when MRE is ignored. This essential data base is simply not in place for any of the key ecosystems or issues important at either a provincial or national level. The PEPA requires an annual ‘State of the Environment’ report, but such a document has not yet been made public—an obligation under the law.

3.84 PEPC has not been able to put a MRE process into place. Reviews pertinent to the NCS have taken place during the implementation of EPRCP and PEP and other major donor supported projects. But these are not a substitute for an overall MRE system with agreed, socially meaningful indicators. At the level of the Cabinet there is not a currently functional mechanism for acting in an integrated fashion on the results of MRE related to the NCS.

**Box 9. Key findings of public consultations conducted in the NCS MTR. (Based on summaries of Public Consultation Meetings held in several regions during late 1999)**

Physical Outcomes	Processes	Limitations / Gaps	Future Way Ahead
<p>Several success stories were reported as physical outcomes over the past decade of efforts in the field of environment and development. However, it was difficult to determine the full impact of these projects as well as their direct linkage with NCS. Moreover, physical data, either baseline or recent, is limited. 'Success' examples are:</p> <ul style="list-style-type: none"> <li>▪ HDIP – introduction of compressed natural gas under pollution control program</li> <li>▪ Forest conservation under UNDP's GEF grant</li> <li>▪ On-Farm water management programs</li> <li>▪ Kasur Tanneries Pollution Control Project</li> <li>▪ Watershed management programs, Tarbela and Mangla</li> <li>▪ Quetta Waste Management Project</li> <li>▪ Environmental Rehabilitation in NWFP and Punjab</li> <li>▪ Mountain Areas Conservancy Project</li> <li>▪ Rural water Supply and sanitation programs under SAP and UNICEF</li> <li>▪ Conservation and management of Juniper Trees Balochistan</li> <li>▪ NRM project of the World Bank</li> <li>▪ Sand Dunes stabilization project Balochistan</li> <li>▪ Area Development Programs of UNDP</li> <li>▪ Kalam Integrated Development</li> </ul>	<p>Several processes were identified that directly or indirectly contributed to overall SD scenario in Pakistan. However, it was also stressed that these were supposed to happen with or without NCS:</p> <p><i>Mass awareness:</i> an across the board perception that there has been an increase in general awareness about environment and environmental issues; however, this did not transcend to development prioritization. Information dissemination about NCS has been negligible.</p> <p><i>Legislation:</i> environmental protection act has been in place however, its enforcement is stated to be virtually absent. Absence of sectoral legislative frameworks was identified as an essential but missing process.</p> <p><i>Institutional strengthening:</i> several support institutions were established under project like EPRC, PEP and PEPA. However, the effectiveness of these institutions has been marked with several questions.</p> <p><i>Economic resourcing:</i> this was implied as part of PEPA enforcement; however, it has yet to take place.</p> <p><i>Community participation:</i> this has been a hallmark of the last decade. The innovative models of RSPs, and SAP were reported as successful examples.</p> <p><i>Capacity building:</i> has been part of certain project design but governance issues did not allow sufficient impact.</p>	<ul style="list-style-type: none"> <li>• Lack of ownership of NCS</li> <li>• Weak institutional arrangements</li> <li>• Inflexibility of NCS to adopt to changing context</li> <li>• Lack of a consistent policy</li> <li>• Budgetary constraints</li> <li>• Lack of baseline data</li> <li>• Lack of political will</li> <li>• Lack of implementation capacity</li> <li>• Over ambitious planning</li> <li>• Inadequate dissemination of information</li> <li>• Lack of coordination between stakeholders</li> <li>• Administrative and operational problems</li> <li>• Absence of M&amp;E mechanisms</li> <li>• Slow enforcement of PEPA</li> <li>• Lack of integration in sectoral programs</li> <li>• Inappropriate governance</li> <li>• Pervasive "no-follow up" culture</li> <li>• Influence of political interests</li> <li>• Inappropriate or no allocation of responsibilities for NCS implementation</li> <li>• Centralized implementation mechanisms</li> <li>• Short term planning</li> <li>• Lack of participation of civil society in development programs</li> <li>• Inappropriate distribution of resources</li> <li>• Donor priorities over local realities</li> <li>• Absence of sectoral legislation and policies</li> <li>• Continuity of human resources</li> </ul>	<p>Refocusing of NCS on current issues in order to make it a SD framework was a major recommendation from all public consultations. This strategic framework should include the following:</p> <ul style="list-style-type: none"> <li>• Poverty alleviation</li> <li>• Climate change</li> <li>• Clean drinking water</li> <li>• Economic interventions to the grassroots</li> <li>• Solid waste management</li> <li>• Sustainable industrial development</li> <li>• Rural uplift</li> <li>• Marine environment</li> <li>• Green economics</li> <li>• Enforcement of environmental act</li> </ul> <p>The above should be supported by establishing enabling institutions and mechanisms such as:</p> <ul style="list-style-type: none"> <li>• Appropriate policy frameworks</li> <li>• Decentralization</li> <li>• Advocacy</li> <li>• Community participation</li> <li>• Reformed governance structures</li> <li>• Resourcing mechanisms</li> <li>• Effective institutions at federal and provincial level</li> <li>• Institutionalization of M&amp;E</li> <li>• Capacity building</li> <li>• Appropriate utilization of expertise</li> <li>• Economic incentives for private sector</li> <li>• Strengthening of civil society actors (NGOs and CBOs)</li> </ul>

Physical Outcomes	Processes	Limitations / Gaps	Future Way Ahead
<p>Project</p> <ul style="list-style-type: none"> <li>▪ Sarhad Provincial Conservation Strategy</li> <li>▪ Siran Kaghan Forestry Projects</li> <li>▪ Malakand and Dir Social Forestry Project</li> <li>▪ Orangi Welfare Project</li> <li>▪ Sindh Rural water supply and sanitation program of IDA and UNICEF</li> <li>▪ Indus Delta Mangrove Rehabilitation project</li> <li>▪ Rangeland management in Sindh</li> </ul>	<p><i>Gender empowerment:</i> this has been addressed through some donor-funded projects; however it remains a weak area in general.</p> <p><i>Monitoring and evaluation:</i> has been part of a few donor-funded projects; however it has largely been a missing aspect of institutional culture.</p> <p><i>Coordination between NCS stakeholders:</i> was extensively debated, yet it was perceived to be virtually absent.</p>	<ul style="list-style-type: none"> <li>• Low literacy level</li> </ul>	<ul style="list-style-type: none"> <li>• Information and communication technologies</li> <li>• Inter-agencies coordination</li> <li>• Institutionalization of EIAs</li> <li>• Redefinition of MoE's structure and role</li> </ul>

3.85 Some units outside of the government have, however, made a considerable effort in MRE. IUCN-Pakistan and SDPI have commissioned and undertaken quality research on a needs basis, and have built in their own evaluation needs. NGOs have formed a Pakistan NGO forum with five coalition forums—one in each province plus one in Islamabad/Rawalpindi. But MRE of the NGO community as a collective effort does not appear to be one of the functions of the forum. A focus on MRE in the private sector is completely absent.

3.86 In summary, an effective overall MRE for the NCS is not in place in the national government, private sector or civil society. A major failing of the NCS is thus the absence of consistent MRE of its performance. Therefore it cannot learn and adjust, a considerable weakness in today's climate of rapid change. An effective framework for Monitoring, Reporting and Evaluation of the NCS should be put in place immediately, using the results of the MTR as a starting point. It should report to the Cabinet Committee, and be supported by a NCS Commission/Steering Committee in the MELGRD, comprising key stakeholders, with PEPA acting as its Secretariat since the NCS Unit has failed to perform this function. PEPA should, as mandated by law, release an annual 'Pakistan State of the Environment Report' starting within the next fiscal year, if not before. MELGRD should also regularly collect and disseminate environmental data to all stakeholders. The role and strengthening of the Federal Bureau of Statistics should be recognized and addressed as part of this process.

### **NCS Today and in the Future.**

3.87 The NCS is at a critical point. There is certainly much evidence of well-intentioned hard work—inside government and especially outside. The enthusiasm of the earlier consultation and planning years and the early period of implementation has turned towards much more hard-edged calculation of what is truly needed for the future, and why the limited gains have been so difficult to achieve. In the process, there has been much experimentation, many exercises to enhance program and project management (of which only a fraction has been discussed here), and a growing sense of frustration that a valuable initiative is being partially wasted and put at peril by a governance system that is simply not performing well. The reality is that Pakistan is certainly not alone among countries having difficulties in the implementation of sustainable development. But the early promise of progress makes these limitations the more difficult to accept.

3.88 The hope for the future is certainly in building on the extensive experience gained in partnering, including the dialogue now existing among government, the private sector and civil society. And, even more so, is the extremely valuable work that has taken place at the provincial, district and local levels, through the individual strategies and through specific projects and approaches, such as participatory field programs and voluntary/market-led private sector initiatives. Furthermore, there is no doubt that much more could be achieved if there is a proper revival of coordination at the national level, if the objectives of the NCS can be made more compatible with needs as articulated by the people (especially the poorer people) of Pakistan, and if initiatives under PEPA and other legislation can actually be followed up with action.