

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

Report of the Mid-Term Review

by

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ABOUT THIS REPORT

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

CHAPTER 7. CONCLUSIONS AND RECOMMENDATIONS

A Glass Half-empty or Half-full?

7.1 This first comprehensive review of almost a decade's progress of Pakistan's National Conservation Strategy reveals a "glass half-empty, or half-full", depending on the perspective of the beholder. There is a great deal of frustration, mistrust, cynicism and anger towards government that more has not been accomplished on the ground. Indeed, further decline in environmental and natural resource conditions appears to be occurring, although baseline information and monitoring are too skimpy to make conclusive statements. Furthermore, few people believe that the NCS in its current form is an adequate approach for sustainable development, since it has had such a limited influence both on key social issues such as poverty reduction and on major economic concerns.

7.2 The idealism and enthusiasm that marked the emergence of the NCS makes its subsequent handling by politicians and bureaucrats appear to be a case of lost opportunity. As noted by one member of the ERT:

"The once 'big, beautiful' NCS has decentralized so much that it has 'atomized' and it is difficult to find the constituent pieces or drivers again. There is no central convenor or steering committee anymore (the Cabinet Committee on NCS Implementation initially met twice, but not since); and participation, which had so strongly characterized NCS preparation, is now much less apparent at the 'centre' of the NCS."

Yet it would be wrong to conclude that the NCS has not made a valuable contribution over the past decade, or that it has lost its potential to be influential in the future.

7.3 Those viewing the glass as half-full see a base now established on which substantive future action can be built. The NCS has introduced a set of ideals and programs that could be central to Pakistan's future well-being—for a nation that was well behind many others in the world on dealing with environment and development. This has been done over a period marked by increasingly chaotic governance, financial crisis, and a difficult security situation. The results so far have been: an expanded awareness on the part of governments (federal and provincial/special areas) of the need for action on environment and sustainable development; considerable advances in the development of the institutional infrastructure for environmental management even though it is not working well yet; some very useful pilot projects; a start at building provincial and even district conservation strategies; and a considerable strengthening of civil society institutions. Even the survival of the NCS as a national strategy for almost a decade is viewed by some as a triumph in a country that has tended to alter its plans and strategies frequently.

7.4 Both views about the 'glass of water' are correct. We would prefer to believe that the view of the glass half-full eventually will be what carries the day. The big question is whether, given the difficult circumstances of Pakistan today, progress can be accelerated and the NCS process strengthened sufficiently that real improvements to the country's environment and people's quality of life will be seen in the future. We believe the opportunity to make this happen exists. The NCS of the future should provide overall guidance for sustainable development in Pakistan. It should serve as a

true national strategy, not a bloated collection of projects, or an unmanageable set of objectives with limited accountability for their implementation.

7.5 Therefore it is important to examine the existing problems as openly as possible and consider their implications not only for government, but also the private sector, civil society and the donor community. In this chapter we want to provide a focus that can be kept easily in mind, rather than trying to review all components and channels for action of what is certainly one of the most ambitious and complex environment and development strategies adopted by a government anywhere in the world. Thus we restrict ourselves to five main conclusions (Box 13) and six major recommendations (Box 14). Some of the conclusions are expressed in terms that may appear very blunt and perhaps not giving full credit to accomplishments by people and institutions that have worked very hard on the NCS. The purpose is to focus on problems as clearly as possible so they can be adequately addressed in the hope that the NCS will be able to play a central role in Pakistan's future.

Conclusions – Five Key Lessons Learned and Views about the Future

7.6 The five key conclusions listed in Box 13 all point in one direction—the need for the federal government to take a more vigorous and coordinated approach in order to properly implement action related to the NCS, and to restore its original catalytic power. However, the NCS itself is dated and missing some key elements. Furthermore, it is far too complex to serve as an implementable strategy, especially in the difficult times currently facing Pakistan. Therefore it needs to be transformed into a new phase (NCS-2) in a fashion that maintains a coherent set of principles and provides overall direction for sustainable development.

Box 13. Five Key Conclusions of the NCS Mid-term Review

1. Achievements under the NCS have been primarily awareness raising and institution building rather than actual improvements to environment and natural resources.
2. The NCS is not operating adequately as a national sustainable development strategy.
3. The presence of the NCS has strengthened civil society institutions and their influence.
4. NCS implementation capacity requires much improvement.
5. The catalytic power of the NCS continues but needs reinvigorating and refocusing through development of NCS-2.

7.7 The individual conclusions are described in more detail below.

NCS MTR CONCLUSION 1

Achievements under the NCS have been primarily awareness raising and institution building rather than actual improvements to environment and natural resources.

NCS Success as a Catalyst for Environmental Sustainability Dialogue and Initial Action

7.8 The NCS contributed enormously to the early 1990s climate of support in Pakistan for environmental issues and community management of resources—although so also did big events such as the Earth Summit and subsequent donor intervention and agendas. In some other parts of the world, by the mid-90s the climate of government financial support for environmental action seriously declined, although not necessarily also at a popular level. These trends were evident also in Pakistan, although perhaps somewhat later. Elsewhere now, however, support for both environment and SD is again on the rise, spurred in part by new concerns related to trade, issues such as climate change and desertification, and growing evidence of the costs of inaction.

7.9 In Pakistan there have been notable achievements in institutional development, including the development of the 1997 Act and innovative measures such as the environmental tribunals, and the Sarhad Provincial Conservation Strategy with its associated district conservation strategies and round tables. While the overall system has been slow in coming together, there is certainly enough institutional development to take concrete action towards improved environmental protection and to implement some elements of sustainable resource management. There is, however, concern expressed by some that the gradual weakening of many governmental institutions threaten those that have remained strong, within and outside government—a few “islands of excellence” cannot remain sustainable.

Progress on Improvements to Environment and Resource Management Insufficient

7.10 The NCS and its 1993 Implementation Plan were spuriously comprehensive, suffering both from a lack of prioritization and from not proposing an ongoing mechanism for dialogue to thrash out priorities. The ‘big book of plans’ is still referred to, but not with any firm degree of trust or accountability. Unfortunately very few of the action goals for natural resource or environmental improvement, as set out in the NCS for achievement by 2001, have any hope of being met by then.

7.11 The enormous investment target of the NCS has not been met, making many of those involved feel like their efforts have been a failure (even though that may not be correct and, in any case, some targets in today’s context might also require revision). Yet there are very interesting and important pilot projects that provide insight for future efforts. Examples were provided in Chapter 3 of this report, and others could be cited. Thus, it is not that interesting activities cannot be designed and carried out. It is that, overall, the NCS is a top-heavy approach that placed a heavy burden on a weak governmental system that has responded by under-performing throughout.

7.12 Many projects have come—overtly or otherwise—from the NCS (350 government-implemented projects have provisionally been counted at the federal level alone). Few have been adequately assessed in relation to their contribution to outcomes and impact of the 68 NCS program areas. It is fair to say that, while some improvements exist, they remain modest and fragmented.

NCS MTR CONCLUSION 2

The NCS is not operating adequately as a national sustainable development strategy.

The NCS does not Make Sustainable Development an Overarching Objective

7.13 Pakistan needs a national sustainable development strategy since the most significant improvements to the environment over the longer-term are likely to come about through a combination of poverty reduction and economic improvements. Shifting the arguments in the other direction, it is the poor who are most likely to be affected by declines in environmental conditions, natural resource scarcity and hazards. There is evidence that the *Genuine Domestic Savings* of Pakistan is being seriously reduced by a combination of natural resource depletion and pollution. The NCS, while making sustainable development one of three main objectives, has not followed through with a workable plan of action, or performed as a convincing strategy since it does not adequately address the linkages of environment, economy and poverty reduction. Nor does it really tackle the actions needed to *integrate sustainability* into environmental conservation and social and economic development—the main criterion of a strategy for sustainability.²⁸ The opportunity certainly exists to address this problem, and it is particularly timely to do so since countries around the world are reviewing ways to increase their national commitments to sustainable development in preparation for the next round of global discussions—to take place in 2002, a decade after the Rio Earth Summit.

7.14 It is clear that much confusion exists about definitions of sustainable development and how the theme should be represented in the NCS, and more generally, as a guideline for development directions and governance in Pakistan. There are three important points to bear in mind. First is that the internationally accepted SD definition developed by the World Commission on Environment and Development in 1987 is still valid.²⁹ Second is that, as noted in Chapter 3, Box 3 of this report, for Pakistan it is vital to recognize that poverty reduction, economic growth and environmental sustainability

²⁸ This point plus 11 other criteria have been proposed by DFID, IIED and ODI (2000) as the basis of an effective SD strategy: people-centred, addressing structural causes of poverty including environmental causes; high level political commitment and influential local institutions; balance short-term priorities with future needs and long-term sustainability; process and outcome oriented; country led and local ownership; building on existing processes and strategies; comprehensive and integrated; participatory throughout; monitoring, learning and improvement; clear targets and priorities; capacity development throughout.

²⁹ One of the most important observations by the WCED is that “sustainable development is not a fixed state of harmony, but rather a process of change in which the exploitation of resources, the direction of investments, the orientation of technology development, and institutional change are made consistent with future as well as present needs.”

should drive action for sustainable development. Attention to these imperatives will help to widen the 'ownership' of the NCS considerably. The key is to identify the relationships among these major goals while developing 'triple win' activities to relaunch the NCS. And third, that sustainable development action depends upon two vital elements: broad public participation in design and implementation of initiatives, and a high degree of innovation since 'business-as-usual' is not likely to generate successful solutions for improving sustainability.

NCS Influence on Linkages to Economic and Social Issues is Limited

7.15 While the NCS participatory processes influenced (positively) the way in which the Social Action Plan (SAP) was developed, these initiatives have not really come together (to look for poverty-environment win-wins, for example). Family planning program initiatives have not been influenced by the NCS, and there is limited transfer to the NCS of field experience gained over several decades by NGOs and government. Thus key ties that might be forged to poverty reduction strategies have not been made.

7.16 There has been very little 'mainstreaming' of the NCS in terms of changing the ways that key macroeconomic and social decisions are being made. The NCS was not being implemented as envisaged across the bureaucratic structure and processes in place during most of the 1990s. The high-momentum, participatory processes used in NCS preparation crashed headlong into bureaucratic silos driven by imperatives other than sustainability. The NCS correctly implied major changes in governance. The challenge of implementing it continues to be almost overwhelming in a country where the bureaucracy dominates, and yet is subject to many obstacles and weaknesses. The failure of government is widely acknowledged. But the new approach focusing on devolution offers fresh opportunity consistent with approaches such as those of the district level conservation strategies and for initiatives such as the Mountain Area Conservation Project.

Some Key Elements for SD are Missing or are not Expressed as Targets

7.17 The NCS is still the 'touchstone', albeit dated, for environmental projects in development planning, but several important new areas are missing from the 14 program areas. These areas are largely those that have become significant internationally in the past five years. They include: climate change, sustainable livelihoods, environmental security, trade and sustainable development (including certification processes), biotechnology, and the role of banking, insurance and investment. A major concern is how some of these new themes can be incorporated into the NCS without further overburdening it.

Lack of Major Policy Shifts

7.18 The NCS did not result in an overall policy shift towards sustainable development, with the exception of some environmental and resource management policies. Indeed the NCS has become gradually more invisible to many bureaucrats. There is a feeling that redefining the NCS in terms of policy, principles, standards, and performance—then developing a system of participation that invites and requires institutions and departments to develop their own responses, might be more effective than a centralized approach that is very difficult to coordinate. Various models exist in the world of how this may be done. Canada, has a Commissioner on Environment and Sustainable Development within the Office of the Auditor General reporting to Parliament on the performance of all government departments, based on their self-

assessment of performance in implementing the SD policies each department has designed.

NCS MTR CONCLUSION 3

The presence of the NCS has strengthened civil society institutions and their influence.

Civil Society Institutions are the Strongest and Most Consistent Contributors to the NCS

7.19 The NCS has been a tremendous stimulus for the development of IUCN-Pakistan, SDPI, a host of environmental organizations and associations operating nationally or at more local levels, and for the expansion of some membership-driven organizations such as WWF-Pakistan. Some of the growth would likely have happened in the absence of the NCS, but it is hard to escape the conclusion that civil society has been proactive in seeking opportunities via the NCS. Furthermore, in contrast to government, these organizations have learned, have developed a capacity to be responsiveness to needs, and have increased their management abilities. Indeed several organizations now have a greater capacity to deliver than counterpart government units. Their value to the future of the NCS and to the people of Pakistan is exceedingly high. The challenge is to continue their growth and development while linking their success to capacity-building at all levels for government, and to make them more effective partners in work with communities and the private sector.

7.20 The key NGOs have become influential in maintaining the profile of the NCS, environment, and to some extent, sustainable development. They also have developed strengths in bringing forward these issues for media attention, and, on occasion, for opening important debates affecting policy on selected issues. This influence is, however, still quite limited, especially in relation to the big economic and social concerns affecting Pakistan. The opening of “new space” for discussion is a major step forward, but new skills and allegiances will be required for these civil society voices to have a broader impact in the years ahead.

Private Sector Bodies have Great Potential but are Less Advanced

7.21 The private sector is still lagging behind the leading civil society organizations in terms of its interest and commitment to the NCS and in terms of its own learning capacity. There are some very positive signals, including the useful dynamic established through the FPCCI, various pilot projects and business investments for pollution control. It is certainly possible that over the coming years much more can be expected in terms of progress by the private sector. Much of this is because of business openness (indeed vulnerability) to global pressures for greener production processes and improved corporate social responsibility.

Civil Society Organizations can Expect to be Involved in the NCS for the Long-Haul

7.22 Some NGOs question their role in the NCS, worrying that they may be taking over responsibilities more properly belonging to government. This is particularly the case where they are taking on a more active role in project, or even program implementation. It would be disastrous for the NCS if, for example, IUCN-Pakistan

were to pull away from its central support role. Similarly, the very useful role being played by SDPI in bringing forward policy issues could not be easily replaced. What has developed is a set of interacting institutions that are now highly dependent upon each other, although not taking full advantage of possible synergies. It is important that government should not be perceived to be simply handing over its responsibilities. On the other hand, it is a reality that government alone cannot adequately implement the NCS or most sustainable development initiatives. Hence the need for continuing growth of both civil society and private sector capacity—and using this capacity to help strengthen government's own capabilities. It is entirely reasonable to build this somewhat complex system of partnership, with each element drawing upon its own strengths and comparative advantage.

NCS MTR CONCLUSION 4

NCS implementation capacity requires much improvement.

Accountability is Lacking

7.23 A strategy owned by everyone must incorporate accountability by all the key partners. This has not happened with the NCS so that not only is it difficult to define who is responsible for goals not being achieved, but, in some cases, even to find people in sectors that should have responsibility who are aware that the goals exist.

An Unworkable Design

7.24 The complex design of the NCS, and of the existing provincial strategies, has worked against its implementation, but continues to be replicated at each new round of strategic planning. The design has to be simplified, while retaining the capacity to present an integrated approach focusing on key environment, economy and poverty reduction/quality of life concerns.

Coordination and Institutional Development

7.25 There is no continuing senior forum for the NCS. The donors, having backed a process in NCS preparation, are now distinctly backing projects only (with the exception of Canada through the PEP initiative, UNDP, World Bank and NORAD). There is little NCS process management within government, and the NCS Unit is a marginalized unit. There has been little overall monitoring, even of NCS “project” inputs, let alone outputs or impacts. The planned information system has not been established, and the NCS Unit has no mandate for implementation. All of these problems have to be addressed, and in a fashion that raises the profile of the NCS nationally and with both existing and potential stakeholders.

7.26 When it comes to strictly environmental matters, several ‘central’ institutions were put in place quite rapidly, including the Planning Commission Environment Section, NCS Unit, EPAs federal and provincial, two Environmental Tribunals, and SDPI. Some institutions are far-from-perfect miniatures of what is needed in terms of well-trained personnel and effectiveness. As already noted, the institutional road map has included a significant increase in the number and effectiveness of professional, private sector and civil society organizations, nationally, provincially and locally. These have helped to provide leadership and support to NCS implementation. As

partnerships, however, they need improvement—amongst themselves, and with government.

7.27 Improved environmental legislation, especially the 1997 PEPA, holds considerable promise, but it stresses punitive approaches and is so far only partially implemented. The NCS was heavy on promoting new regulations, but did not cover voluntary approaches, market instruments, and enabling legislation as much—topics that have evolved considerably in the international scene since the NCS was designed. Small numbers of progressive private sector firms are moving forward on environment and SD and expressing the need for action on improved incentives, while the majority still escape action and are still scot-free of the punitive measures introduced within legislation.

Only One Provincial Strategy is Truly Functional at Present

7.28 Institutional development in the form of local strategies has proceeded in some jurisdictions, especially through the Sarhad (1996), Balochistan (2000), and Northern Areas (formulation stage) strategies, and two district strategies in NWFP. This matches the original intention of the NCS, although it is notable how little some of the federal government NCS players have been involved in the provinces. The situation in Sindh, Punjab, and perhaps AJK is much less promising. For the first two in particular, there have been strong institutional barriers to the development of a provincial conservation strategy. Thus the goal of having a second-tier of conservation strategies throughout Pakistan may be very difficult to achieve, and should only be pursued if it can lead to meaningful and implementable strategies.

7.29 These more local strategies are proceeding on a consensus-building and information sharing basis, structured around on-going round tables, cross-sectoral partnerships, SD focal points within government, etc., rather than a static 'document' approach. In the process they have become less connected to the NCS. But there is an important learning opportunity for bringing the existing provincial experience to the national level.

NCS MTR CONCLUSION 5

The catalytic power of the NCS continues but needs reinvigorating and refocusing by developing NCS-2.

Public Awareness of the NCS and Environment Issues is Still Limited

7.30 Awareness of environment and development concerns, if measured by media stories, appears to have peaked in 1997 within Pakistan. There is little indication that the NCS reaches audiences at the community level in most parts of the country. Consequently there appears to be limited understanding on the part of people concerning the link between environment and the potential for improving the quality of their life. Thus NCS potential to play a catalytic role needs to be rekindled in some very fundamental ways. This should be possible, and if done well, will build a level of support for further action within government. The current focus on devolution provides the ideal opportunity to spread important messages associated with the NCS throughout Pakistan, and, in turn to learn much more about local needs. As discussed

at length elsewhere in the report and in the recommendations, this can help to transform the NCS into a demand-driven agent for change.

Within Government NCS Influence has been Declining—Nationally, and in Certain Provinces and Sectors

7.31 Major political commitment was built up at the time of agreeing to the NCS goals and plans, and some shadow of this commitment remains. But it is weak on the all-important area of institutional change, needed to implement the strategy. And as the impetus for this change slackens, overall attention to the NCS in budgets and in decision-making has slipped. Yet there is a recognition of the need for an umbrella mechanism. Indeed, if there were not an NCS, there almost certainly would be a need to re-invent it. The various sectoral and other plans and strategies evolved over the last decade are valuable in their own right, but do not add up to a whole. The NCS was to provide that whole.

“Brand Name” Recognition of the NCS is Helpful

7.32 There are various, and in the minds of some, competing approaches to what should become this “whole” in the future. It will be important to clarify linkages among several initiatives. These include the Biodiversity Action Plan, the possibility of an Environmental Strategy, various initiatives that may bear the label of sustainable development—all in addition to the NCS. It would not be wise either to ignore these or, most importantly, to assume that they can in any sense replace the role of the NCS as a nationally significant umbrella strategy for addressing environment and development. We suggest a revised NCS-2 with a clearer focus on sustainable development. The value of staying with the name is that it is a well-established “brand”, even if not universally recognized. Furthermore, it has substantial set of accomplishments around which many more could be added.

Recommendations

7.33 The number of main recommendations (Box 14) has been kept small deliberately, and they are written simply. We want them to be reviewed and debated within many different circles. All six recommendations should be considered together, for they have been crafted with an integrated approach in mind. Detailed suggestions are provided in the context of each main recommendation. These more detailed recommendations are derived from the wealth of information brought together in the course of the MTR and should provide useful directions for the remaining period of the existing NCS as well as guidance for the NCS-2 redesign we propose.

Box 14. Six Main Recommendations of the NCS Mid-term Review.

1. Ensure that the NCS is fully owned by government, the key partners and stakeholders, and by building on the concerns and needs of the people of Pakistan.
2. Switch the NCS from top-down and supply-driven to a bottom-up demand-driven approach.
3. Prepare NCS-2 to serve as Pakistan’s sustainable development strategy for 2002-2012 with a greater emphasis on poverty reduction and economic development in addition to environmental sustainability.

4. Make government institutions work towards an 'enabling framework' for sustainable development.
5. Expand the range and scale of financial mechanisms for meeting NCS objectives.
6. For donors, demonstrate commitment to a renewed NCS through consistent and coordinated support.

7.34 Change is needed immediately in order to get maximum benefit out of existing investment in the NCS, to raise its profile, and to lay the groundwork for NCS-2. We therefore have highlighted several recommendations for immediate action. In addition, there are recommendations that should be acted upon within a year. We have avoided the phrases "short-term" and "long-term". For much of the action that can be taken immediately will have long-term benefits. And we have avoided the temptation to make recommendations that will await implementation for more than a year. It is an important and demanding time to be contributing to Pakistan's restructuring. While the subject matter of sustainable development always looks to the longer-term, it must be able to demonstrate positive benefits almost immediately, if initiatives are to have credibility, given Pakistan's current situation.

7.35 While advice to government, and especially to the federal government, may appear to dominate within the recommendations, it is well to keep in mind the first key recommendation—that the NCS needs to be fully owned by people and organizations spread throughout Pakistan and in civil society and business as well as within bureaucracies. Government's role is emphasized because it has been perceived to be a slow learner and weak performer in many ways, sometimes hindering rather than helping NCS implementation. We assume that NGOs and business will continue to grow in strength, but no national strategy can thrive without the facilitation and leadership of those in power. Thus, the message to civil society partners engaged in the NCS implementation process is that they should not plan for an early exit—their skills and inputs indeed must be enhanced and made more accessible through partnerships. Government agencies on the other hand must become more accustomed to needs and priorities being set in collaboration with stakeholders. Nowhere is this more true than with the NCS.

NCS MTR RECOMMENDATION 1

Ensure that the NCS is fully owned by government, the key partners and stakeholders, and by building on the concerns and needs of them people of Pakistan.

7.36 Since the NCS potentially touches on the lives of all citizens and many areas of governance, it should be influencing government and societal action from bottom to top—community and district to the provinces and federal government, by civil society and by the private sector. It should operate not as a parallel plan, but as a guide for government policies and programs. Government, accordingly, should streamline its policies, plans and financial allocations to align with the NCS—much more effectively than in the past. It will require a robust, central coordinating body capable of guiding

this transition nationally and helping to facilitate stakeholder participation and ownership.

1.1 Revitalize and recommit to the NCS at the highest levels of the federal government with a focused, strategic approach leading to demonstrable institutional strengthening and environmental improvements in the coming year.

IMMEDIATE

- Chief Executive makes public commitment to NCS and its renewal as Pakistan’s sustainable development strategy; Cabinet discussion and commitment to action on a select list of priorities with assigned accountabilities and leadership by specified ministers and government units.
- Suggested priorities for action results over 12 months include:
 - PEPC composition and mandate reviewed, with follow-up action and performance criteria established.
 - Completion of implementing regulations for 1997 Act.
 - Establish procedures for the operation of the Environmental Tribunals.
 - Finalize regulations on industry self-monitoring and their link to the national reference laboratory.
 - Release the first State of Environment Report for Pakistan.
 - Complete several pollution reduction projects now underway, e.g. Kasur Tanneries, as concrete examples of action.
 - Set and meet achievable targets for five or more sectoral initiatives within the context of the current NCS.

1.2 Ensure that planning for devolution and for NCS district-level initiatives proceed together, recognizing the need to make sustainable development central to local level governance.

IMMEDIATE

- MELGRD Ministerial Advisory Committees on Environment and on Local Government jointly develop a “white paper” linking the NCS and devolution.

1.3 Key NCS stakeholders should take stock of what they have individually and collectively accomplished under NCS and engage in a joint process to redefine and strengthen strategies.

IMMEDIATE

- PEP partners and individual NCS stakeholder groups consider how the findings of the NCS Mid-term Review apply in relation to their individual efforts to implement NCS components, and how they might overcome barriers to progress.
- The PEP partners establish a national “forum” to examine how the NCS should be “owned, housed and implemented” in the future, and whether the partnership needs to be expanded, for example through the addition of one or more provinces and business organizations. The forum should provide an opportunity for the stakeholder groups to learn from each other’s experiences and aspirations.

1.4 Revitalize and expand strategies for individual and community-level awareness-building about NCS objectives.

WITHIN 18 MONTHS

- Explore greater use of approaches that have proven successful, especially use of techniques such as radio broadcasts for reaching poorer people and communities and new approaches that can reach certain audiences (e.g. Internet for middle class urbanites).
- Commit to environment and sustainable development education on a much greater scale than in the past, drawing upon the pilot experience at both national and provincial/special areas levels, and accessing both the public and private school system.
- Include NCS awareness-raising components in both urban and rural support programs. The “brand name” recognition of the NCS may well be mainly at the level of stakeholders. What is important for ordinary people and communities is awareness of environment and sustainability.
- Thoroughly revise the redundant NCS Communications Strategy. 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. In order to assess behavioral change as a result of mass awareness drives, a market survey of different social groups in each part of the country needs to be carried out. Without this, it will not be able to measure future achievements. Obviously there is a need to be focused on tangible issues where progress can be expected.

1.5 Focus much greater attention on incorporating the views and needs of poor people and communities, and on their direct participation in sustainable development goal setting and implementation.

WITHIN 18 MONTHS

- Place greater emphasis on identifying beneficiaries and ensuring their views, constraints and strengths are actually addressed in actions resulting from the NCS.
- Make consultation an accepted and workable element of every aspect of the NCS, drawing upon strengths such as the Round Tables, focus groups, and mandated activities such as EIA.
- Design a feedback mechanism from district, to provincial, to national strategies. Initially this should communicate the results and concerns of recent consultations and round tables. Thereafter a more structured set of communications among the different ‘tiers’ of participation would be helpful, so that the NCS builds from the bottom up, as well as in response to national and international affairs relevant to the NCS.

1.6 Establish a multi-stakeholder NCS consultative forum, and strengthen other partnerships among government, civil society, and the private sector.

WITHIN 18 MONTHS

- Establish a cross-sector, mixed government/civil society/private sector NCS consultative forum that might meet about twice a year to review issues and progress.
 - Establish more pilot projects based on voluntary and incentive driven approaches, and on municipal level private-public-community partnerships for water and waste management.
 - Place much greater emphasis on the involvement of the private sector, including small and medium-size firms, insurance and banks, and other organizations not yet influenced by the NCS—creating the conditions for responsible business to thrive and ‘closing doors’ to bad environmental/social practice.
 - Encourage international networks and partnerships between leading businesses and civil society groups so that SD methodologies and technologies can be shared. Re-orient research agendas towards priorities that are in-line with NCS and national development needs.
 - Build policy knowledge networks based on working partnerships so that experience is captured and used to inform policy reform.
- If these points can be addressed, the following perspective provided by MELGRD may serve as a vision: “Pakistan on the path of progressive development, characterized by effective legal, administrative, corporate and civil society institutions that promote sustainable economic growth, sound environmental management and social equity.”

NCS MTR RECOMMENDATION 2

Switch the NCS from top-down and supply-driven to a bottom-up demand-driven approach.

7.37 Priorities for the NCS should be driven as much as possible by problems being experienced in the different regions of Pakistan and by the needs of local people, communities and businesses within these areas. The NCS can and should deliver benefits at this level, thus ensuring that interest and commitment to its objectives will become more widespread, creating on-going demand for practical conservation and sustainable development action. This means improving the already promising participatory and analytical elements of district conservation strategies and of other programs (e.g. SAP social forestry projects, AKRSP initiatives) that directly link to communities. In some cases, this could also be in cooperation with other initiatives that have good local penetration. The production of the overly elaborate, theoretically satisfying but almost impossible to implement, complex plans represented by the

existing NCS document and the draft Balochistan Conservation Strategy should be avoided in the future. Indeed this unwieldy comprehensiveness should be taken as a sign of a lack of participatory assessment of *practicable* priorities. A crisp, and short strategy paper may prove more workable, if it can lead to a productive, implementable action plan.

2.1 Review the existing NCS and provincial experience with local level planning and projects for applicability in the government's devolution plans, and for future activities under the NCS and provincial conservation strategies.

IMMEDIATE

- Review the lessons being learned about demand-driven approaches from existing models being applied in the 14 NCS theme areas, e.g. community conservation organizations, rural support programs, pollution control driven by local interests (Kasur tanneries), district conservation strategies, district environment committees (Punjab), and Orangi experience. Ensure this information becomes quickly available to the key architects of devolution and within the NCS "family" including the provincial strategies.
- NCS implementers should actively participate in the public debate on devolution. They should bring together their best experiences to date and apply this knowledge on a priority basis.
- Examine other locally-based initiatives, for example specific sectoral experience, the environmental components of family planning/community health programs and activities under SAP, to determine sources of useful experience for redesigning the NCS and related strategies.
- Building on the above, determine how gender considerations can be worked into local, demand-driven initiatives and community organization of the NCS and related strategies.
- Consider how the Balochistan Conservation Strategy, the Northern Areas proposed strategy, and other efforts currently at a planning stage in the NCS or provincially can be made as compatible as possible with a bottom-up demand-driven approach even if it means significant changes, especially in the case of the Balochistan Strategy.

2.2 Refocus NCS processes toward a demand-driven approach, with appropriate changes in priorities and how they are set, establishment of client-based relationships, and adaptive management.

WITHIN 18 MONTHS

- Place much more emphasis within the existing NCS on fostering both rural and urban support programs that can deal with demands linked to poverty reduction and local resource conservation and management, while building greater local control over priorities and outcomes.
- Explore the feasibility of taking the district conservation strategy as a model for application throughout the country, or at least on a more extensive pilot basis beyond the NWFP.

- Examine whether it is feasible to create urban conservation strategies for the major cities, and if so, develop a bottom-up, demand-driven approach that can be used to identify a small number of high priority actions that will improve living conditions for the urban poor in particular. Ensure that international lessons of the Local Agenda 21 model are identified and shared at the beginning of this effort.
- Change the existing approach of working from a fixed ten year agenda, with little or no formal opportunity to incorporate learning or altered circumstances during implementation. This change will demand discussion among various NCS partners to draw out relevant experience on adaptive management approaches.

2.3 Recognize the need for financial sustainability, accountability and effective structures at local levels as prerequisites for this bottom-up approach.

WITHIN 18 MONTHS

- Undertake a detailed analysis of the impacts of various budget constraints on the implementation of devolution and local sustainable development, using two or more pilot districts.
- If deemed appropriate, support the merging of departments at the district level, for example Environment and Public Health in order to achieve more effective poverty reduction outcomes or other outcomes related to the NCS.
- Support the development of accountability mechanisms and capacity of local government through technical assistance on the part of government and donors, with NGO assistance to implement and monitor.

NCS MTR RECOMMENDATION 3

Prepare NCS-2 to serve as Pakistan's sustainable development strategy for 2002-2012, with a greater emphasis on poverty reduction and economic development in addition to environmental sustainability.

7.38 The need for a workable sustainable development strategy in Pakistan is stronger than ever. New issues have emerged, for example climate change, environment and security, and trade and sustainable development. Circumstances of governance, the economy and social development have shifted. And there is a continuing decline in both human and ecological conditions. Furthermore, there is greater awareness of the need to handle important crosscutting issues that were not fully anticipated by the NCS, notably globalisation and gender concerns. Finally, the focus of NCS-2 must still cover the essential environmental and natural resource conservation needs of Pakistan. But much more attention needs to be given to sustainability in economic and social systems too, and their links to environmental sustainability. Special attention is needed on the role of poverty reduction in bringing about environmental sustainability, while providing direct benefits to poor people, who

are the most affected by lack of access to critical resources and poor environmental conditions.

7.39 The sustainability of human resources and natural resources in a country are closely linked—well-being of one cannot be assured without the other. NCS-2 will have to consider inputs directly into the mainstream of both primary education and primary health care systems.

7.40 NCS-2 therefore should be Pakistan's macro-strategy for sustainable development, operating synergistically with other important strategies such as the SAP, structural adjustment loans, and the Biodiversity Action Plan. Always, NCS-2 should have the major value added of ensuring sustainability through integration of these "component" strategies. NCS-2 should be developed and approved in 2001, for implementation in 2002. The transition to NCS-2 presents an excellent opportunity for the switch to a demand-driven approach, linked to the national focus on devolution. The suggested characteristics for NCS-2 are discussed at some length in Chapter 6 of this report. Clearly it will need continuity with work already started

3.1 Establish a transition team to design a revised National Conservation Strategy for sustainable development, reporting to the Chief Executive and Cabinet no more than 12 months after its establishment.

IMMEDIATE

- Appoint a NCS-2 transition team drawing on people from government, civil society and the private sector, plus provinces/special areas. The team should include representatives of each PEP partner, be led by a senior federal government representative, have a well established link with PEPC, and proceed in a consultative fashion. The team should be supported by a secretariat with visibility and seniority. It should operate in a consultative fashion, taking into account the need for a bottom-up and demand-driven approach.

WITHIN 18 MONTHS

- Prepare a genuine strategy document—short and focused with clear targets for action—not a document that combines state of environment reporting, investment approaches and other elements that divert attention from an implementable strategy.
- Take into account specific sectoral and cross-sectoral strategies that have emerged since the original NCS was developed, and ensure that they harmonize with NCS-2 objectives.
- Consider how certain themes that have emerged since the original NCS ought to be treated in NCS-2, for example, climate change, trade and sustainable development, market incentive approaches, environment and security, and gender.

3.2 Gender integration should be given a much more prominent role within all NCS activities, with achievable objectives that can be monitored and reported on. While this is a matter that should be acted upon within activities already underway or planned under the NCS and other strategies, it is vitally important that gender integration be featured within NCS-2.

IMMEDIATE

- Decisions should be made on a formal mechanism within the environmental assessment process to address gender integration within projects, and on gender being a prominent component within mass awareness and environmental education and environmental health campaigns.

WITHIN 18 MONTHS

- Incorporate the results of the April 2000 national workshop into the NCS-2 Strategy and ensure that gender considerations are adequately dealt with in consultations for NCS-2 and State of Environment reporting.
- Assess both the institutional (rules and policies, recruitment) and programmatic elements (areas of work, project cycles, specific initiatives) of gender integration within the stakeholder organizations linked to NCS, with the intent of improving their performance over the coming years. This assessment could be carried out by the organizations themselves but with professional input from PEP partners or others. It should focus on capacity building needs and institutional mainstreaming at all levels within organizations, and within all sectors under consideration within the NCS. Capacity building should achieve awareness and sensitisation, but move beyond this to application of gender analysis tools, for example, in program development and implementation, and to the use of gender sensitive indicators within monitoring and evaluation.
- Build a coherent picture within NCS-2 of how women can contribute as effectively as possible to meeting NCS-2 objectives, and how they can share equitably in the benefits of sustainable development.

NCS MTR RECOMMENDATION 4

Make government institutions work towards an “enabling framework” for sustainable development.

7.41 Governance reform should take into account institutional change and capacity building needs for sustainable development. The original concept of building responsibility for sustainable development throughout government remains valid, but it has not happened so far. Thus reform is needed in the way leadership and coordination are expressed through the cabinet and policy structures such as PEPC. A much more robust and widely respected unit is needed to coordinate and facilitate the implementation of the NCS within the federal government. And more attention needs to be paid to fostering and improving the relationships with provincial and local government. Indeed, with a demand-driven model based on devolution, drastic changes are needed in how the national government responds to local need.

7.42 Government will have to depend to a much greater extent on effective, efficient partnerships with NGOs and the private sector to implement sustainable development. Experience to date suggests that changes are needed to avoid an excessively rigid and slow-moving set of relationships. Government agencies

rarely have played a facilitative role. They appear to hinder rather than help progress with the NCS at times. This must change—drastically and as quickly as possible. The overall need is to have all actors working as part of the enabling framework.

4.1 Revamp the “macrostructure” for NCS administration and management to improve policy, coordination, planning and implementation capacity, to increase effectiveness in working with the provinces and special areas, and to facilitate activities not directly under the control of government.

IMMEDIATE

- A champion for the improvement of NCS administration and management is needed. Logically this responsibility at the senior level will be the Minister responsible for MELGRD and PEPC. The Minister should issue a directive delineating a plan for improvements.
- PEPC should have its composition, mandate and functioning updated. It should include representatives from the Finance Ministry and the private sector financial community, and additional representatives to cover areas of growing significance such as trade and foreign affairs. Unless decisions are made to restrict the focus of PEPC to environmental issues only (which is not recommended), PEPC should be transformed into a national commission dealing broadly with sustainable development, as defined in the context of NCS-2. This choice must be carefully considered, for there needs to be an effective policy forum and senior body in place to provide direction in the coming year and beyond. PEPC will have to meet more regularly and be more accountable for its advice. This structure needs to accommodate a demand-led approach.
- The NCS Unit in MELGRD has been unable to perform its task effectively for a number of reasons, including its low standing, poor continuity in leadership, and inadequate access to sufficient professional staff. It should be disbanded. 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. More radical possibilities exist and might be considered, for example, setting up an independent environmental monitoring organization, or by amalgamating environmental and economic interests into a single national council.
- 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.” The “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.
- The federal government needs to build a sense of ownership towards the NCS at the provincial and special areas level. At present there is a sense of

alienation since the provinces feel poorly served. There are three key points that could help reverse this situation:

- Speed up the flow of information, benefits and approval processes, thus reducing the sense that federal action hinders rather than facilitates action. Blocking grants for minor technical reasons is a particular irritant.
- Facilitate sharing of experience among provinces and special areas.
- Continue to build sustainable development initiatives with provinces where no PCS exists, but move towards development of provincial strategies only when there is a clear request to do so.

4.2 Ensure that reforms planned for the civil service are well-instituted within the NCS management system, with particular attention to capacity development.

IMMEDIATE TO 18 MONTHS

- There are several key reforms that can improve NCS implementation:
 - Reduce the frequency of transfers so that government staff remain in a specific job long enough to understand the position and achieve objectives.
 - Build professional staff into key positions rather than rely upon generalists. The need is very widespread: within EPAs (federal and provincial), Environmental Section of Planning and Development, NCS focal points within government sectoral departments, policy units, regulation, enforcement, monitoring and evaluation units.
 - Focus on capacity building through action initiatives—‘accomplish while learning.’ Capacity development is about managing the process and outcomes as well as technical skills development.
 - Recognize that all sectors need capacity development simultaneously if they are to function as parts of an overall effort to implement the NCS.
 - Recognize and use the support function of IUCN-Pakistan and others, for example from the private sector, more effectively as a source for capacity-building efforts within government.

4.3 An effective framework for monitoring, reporting and evaluation (MRE) of the NCS should be put in place.

IMMEDIATE

- Set up the MRE system in a fashion that fosters adaptive management, through effective learning and periodic revamping of objectives and action based on evaluation results. This should use the results of the MTR as a starting point. It should report to a Cabinet Committee, and be supported by an NCS steering committee in the MELGRD, comprised of key stakeholders, with PEPA acting as its secretariat.

WITHIN 18 MONTHS

- 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 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.
- Disclosure and dissemination to communities of information gathered through public agencies should be strengthened and institutionalized. Decisions at all levels suffer because this is not done at present.

4.4 Clarify rights, responsibilities, relationships and accountability for results on the part of each agency charged with implementing components of the NCS.

WITHIN 18 MONTHS

- The lack of accountability measures for NCS objectives perpetuates a system of promising more than can ever be delivered, and reduces public and private sector confidence in government. The transition team charged with preparations for NCS-2 should recommend a system of accountability, and clarify responsibilities for the implementation of each recommended area of engagement.

NCS MTR RECOMMENDATION 5

Expand the range and scale of financial mechanisms for meeting NCS objectives.

7.43 Sustainable development is about investment—for addressing problems arising from the past; for safeguarding resources, health and livelihoods today; and for improving prospects for economic, social and environment conditions in the future. The investments in the NCS appear to have been skewed towards a few traditional natural resource problem areas and were much less than originally anticipated. There are questions about how effective many of these investments have been. Given the financial crisis within government, it is clear that competition for funding of programs and even routine activities will continue to be very difficult. Thus new and innovative approaches to funding sustainable development initiatives is required—especially those that can channel private sector investment positively towards sustainability and away from damaging practices.

7.44 Elsewhere in the world there is a move towards such innovative approaches, even in countries not facing the same financial dilemmas as Pakistan. Part of the solution lies in addressing perverse macroeconomic policies. More of the financial burden needs to be shared by those creating environmental problems, especially for industrial pollution control. The need to value resources in a fashion that allows an equitable distribution of revenue and other benefits to local communities, and covers their management costs, is a challenge for which there are existing, promising pilot activities. And even very poor communities can benefit from micro credit approaches that simultaneously help to create wealth while improving environmental conditions. Finally, Pakistan can try to capture a greater share of the international financial transfers now being dedicated to addressing global environmental sustainability concerns.

5.1 Expand internal resource mobilization in support of the NCS and provincial conservation strategy initiatives.

IMMEDIATE

- Implement the pollution tax system, even if on a pilot basis.
- Ensure the concept of a sustainable development fund becomes functional.
- As part of Pakistan's structural adjustment plans, examine the potential of cost-savings that might be made through implementing elements of the NCS, especially those areas dealing with perverse subsidies, taxes and self-financing mechanisms, and possible means for support through structural adjustment lending and debt for nature swaps.

WITHIN 18 MONTHS

- Look internally at pricing (energy, water), the process of importing pollution control equipment (where extra charges offset the import duty relief already granted), efficiency gains (water use, privatising some municipal services, eco-efficiency in industry, switch to natural gas), credit access and self-financing, as means to reduce costs of implementing environmental and natural resource management and monitoring.
- Expand cost recovery initiatives through user fees (for higher quality services, solid waste removal, and dedicated taxes linked to actual environmental improvements, where people are willing to pay).
- Expand the number of rural support programs with a conservation component, based on a combination of micro credit and community savings initiatives. There is also potential for this to happen in selected urban settings.
- Reallocate funding within government budgets to address current imbalances that exist among key priorities of the NCS; and ensure this matter is addressed in relation to NCS-2.

5.2 Develop innovative sources for funding and investment in environment and sustainable development. These would have the added benefit of acting as economic incentives for sustainable development.

WITHIN 18 MONTHS

- Green business opportunities should be fostered in Pakistan. Examples include environmental control engineering manufacturing and installations, general opportunities related to expanded trade in environmentally-certified products and businesses, energy conservation companies that make their money from the savings to businesses resulting from energy retrofits, and ecotourism. Because Pakistan is at a very early stage and with numerous barriers to smooth implementation, it will take time for the full potential to be realized. There should be a green business and sustainable markets components to NCS-2 and an examination within both government and the Pakistan Chamber of Commerce of how to create an enabling environment

for private sector entrepreneurs, and in some cases, local communities to develop opportunities, for example an SD innovation fund.

- Pakistan should seek a greater share of global funds and markets (e.g. via GEF, carbon funds, various foundations and other sources for biodiversity protection) that reward global benefits produced by individual countries for the international community. To do so will require competitive proposals, improved performance on existing transfers (e.g. under the Montreal Protocol), and demonstration of a capacity to monitor results.

NCS MTR RECOMMENDATION 6

For donors, demonstrate commitment to a renewed NCS through consistent and coordinated support.

7.45 Relationships between Pakistan and donors have slipped to the point where several donors are no longer actively pursuing new initiatives or have pulled out. In addition to the factors such as nuclear testing and change in government that have led to this situation, there is a strong sense of frustration on the part of some donors about the general level of achievement and even government's capacity to develop suitable plans for implementation. On the part of the government and some NGOs, there is frustration about the consistency and capacity of donors to make commitments towards priorities that are in Pakistan's best interests. Indeed, there is a level of wariness about extending the already heavy burden of debt with more foreign loans, even where these appear to be worthwhile. Improved collaboration between donors, government and civil society organizations is highly necessary, although not an easy task at present. Donors need to recognize the value of staying with the demanding task of supporting Pakistan's sustainable development needs. If they do not, problems are likely to become worse within Pakistan, with longer-term repercussions not only for the country but for the world.

7.46 A great value of the NCS is the innovative partnership arrangements that have been initiated between government, NGOs and, to some extent, with the private sector. These have both depended upon, and opened up important opportunities for development assistance cooperation that can be built upon and expanded in the future. There should be a more coordinated approach to donor assistance in order to make best use of limited funding, especially in relation to these partnership opportunities.

6.1 The Government of Pakistan should take the lead in establishing a donor coordination forum for the NCS, covering the existing and proposed range of initiatives in environment, natural resource management, and sustainable development, and, as appropriate, linkages of these areas to other key donor themes, especially those for health and social action, economic growth and poverty reduction.

IMMEDIATE

- Convene a meeting of donors to discuss the conclusions of the MTR, set out the pathway for NCS-2, and develop a plan for improved collaboration among donors and between government and donors.
- Individual donors should take stock of what they believe to be the value of their contributions to the NCS and, in general, of the scale of their investment in support of environment and sustainable development—and how they might address these themes in the future individually and on a collective basis. It would be helpful to have this baseline information accessible in the early stages of planning for NCS-2. For example, the UNDP commitment to a National Sustainable Development Programme (NSDP) will have considerable synergy with many of the recommendations noted here.

6.2 Donors should seek ways of assisting both government and non-government implementers of the NCS as they develop a demand-driven approach for NCS-2.

WITHIN 18 MONTHS

- Donors should pay greater attention to environment and sustainable development as they put together support for devolution.
- Planning for support of NCS-2 ought to begin as soon as possible to ensure that there will not be a hiatus in donor funding as occurred in the early years of the NCS.
- There is a need to evolve policies and funding for the particular circumstances that currently exist in Pakistan. It is especially important to recognize the special role that civil society organizations and hybrid organizations such as IUCN-Pakistan (which includes both governmental and non-governmental bodies as members) have in management and capacity-building for sustainable development. They require continuity in funding if they are going to be strong partners. Their needs should continue to be addressed by donors, no matter how difficult donor relationships with government may be at times.
- Some of the areas suggested to the ERT for future consideration by donors are: energy production systems, hazard preparedness and management, environmental security and conflict resolution, climate change and sea level rise, and monitoring using sustainable development indicators.