

Institutional Development for NCS Implementation

for input into the
Mid Term Review
of the
Pakistan National Conservation Strategy

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Table of Contents

Executive Summary	3
Part I	5
1.1 Introduction	
1.2 Background	
1.3 Methodology	
1.4 Organisation of Report	
1.5 Acknowledgements	
Part II Institutional Development Envisaged in NCS	9
2.1 General	
2.2 Institutional Development	
Part III Ground Realities	12
3.1 General	
3.2 The NCS Unit	
3.3 The EPAs	
3.4 Environment Sections in Planning Departments	
3.5 SDPI	
3.6 IUCN Pakistan	
3.7 The Corporate Sector	
Part IV Conclusions	21
4.1 General	
4.2 Implementation	
Annexes	
A. Relationship Chart	
B. Timeline	
C. Bibliography	
D. List of individuals met	

Executive Summary

The National Conservation Strategy is a comprehensive document that sets out a policy framework for natural resource management and environmental sustainability in Pakistan. Its main objectives are the conservation of natural resources, sustainable development and improved efficiency in the use and management of resources. The document, which was produced by the government in collaboration with IUCN after a broad-based consultative process, envisaged 14 core implementation areas.

Under the proposed mid term review of the NCS, its processes are to be reviewed through six studies. The current report focuses on institutional development and will feed into the final MTR with a view to enabling key stakeholders to take necessary steps for mid course correction. The report analyses institutional strengthening and development under the NCS with the help of the written assessments of these institutions, interviews with key official and non-governmental informants and a critical exposition of the institutional responsibilities and mandates.

Admittedly, NCS implementation requires substantial institutional development and strengthening in the overall context of building sustainable capacity for the environment in Pakistan. Accordingly, the NCS envisages the establishment of an NCS Unit in the Ministry of Environment and an Environment section in the Planning Commission besides an independent policy think tank on sustainable development. However, the document recognizes that NCS implementation through capacity development for better environmental governance requires more than setting up new organizations. Also crucial are mechanisms for enhanced inter agency cooperation, collaboration and coordination. The NCS envisaged two possible ways, to be pursued simultaneously, for enhancing interagency collaboration; first, strengthening the external relationship protocols of each agency and second, strengthening and reorienting the existing coordination forums. For this purpose, the NCS unit was entrusted with the overall responsibility to coordinate and monitor the implementation of NCS activities.

The study finds that the dynamism, commitment and drive that so characterised the formulation process of the NCS document is, except for some notable successes, sadly missing in its implementation to date.

Specifically, whilst an NCS Unit has been set up in the Ministry of Environment, with the aim of coordinating and monitoring the NCS related activities, its location within the hierarchy of the Ministry relative to the other entities both within and outside the Ministry of Environment, its staffing structure, and its formal mandate, are such that it has been unable to perform this task to any significant degree. Coordinating and integrating policies and programmes of line ministries is a

complex task at best, requiring the unit charged with ensuring such coordination to be placed within an organisational structure that is viewed by others as being compatible with its mandate. This observation is perhaps applicable to the Environment Protection Agencies as well, with their integrating, coordinating, monitoring, and regulating roles being not in line with the human and financial resources that they possess.

Lack of ownership of the NCS document is an issue that crops up repeatedly during discussions with key stakeholders. This, coupled with the relatively weak capacity to further the NCS agenda that exists within the NCS Unit, is perhaps one explanation for the lack of success that this particular Unit has had in carrying out its assigned tasks.

Systemic issues of lack of political will, bureaucratic infighting, frequent transfers of key personnel, tension between staff recruited under donor assisted projects and those on the regular government payroll, and shortage of financial and technical resources are present across the board, hampering effective functioning of the entities set up under the NCS, including but not limited to the Environment Sections in the Planning Commission and in the Provincial P& D Departments.

These issues in no way should be seen to belittle the efforts of individuals and organisations that have worked towards implementing the NCS agenda. The process leading upto the promulgation of the NEQS, the adoption of the SMART self monitoring tool by the EPAs, the active private sector involvement in the EPTI programme, all point towards the impact that the NCS document has had on the environmental landscape of Pakistan. IUCN and SDPI have established themselves as a valuable source of technical skill and knowledge. Their role in strengthening capacities within government to deal with issues related to the NCS, whilst enhancing their own capacity to deliver such services at the same time, is an excellent example of a virtuous cycle at work.

The overall picture is one in which individual entities are working reasonably satisfactorily, given the systemic constraints identified above. There is, however, considerable room for improvement for working within the collaborative framework envisaged in the NCS document. Without an institutionalised collaborative mechanism, it is doubtful if the results conceived by the original authors of the NCS will ever be realised. Developing a workable mechanism for institutionalising collaboration and coordination at the highest levels is hence of the utmost importance.

1. Introduction

1.1 Background

The Pakistan National Conservation Strategy (NCS) situated Pakistan's socio-economic development within the context of a national environment plan. The NCS began with a two year start up phase, followed by three years of preparation, during which a strategy document was prepared, reviewed, revised and submitted to cabinet for approval. Pakistan's NCS was approved by cabinet in March 1992, and has been regarded as one of the most comprehensive documents of its kind in the world. The authors and stakeholders of the document endeavoured to make this the central document against which sustainable development in Pakistan would be measured.

An NCS Mid Term Review (MTR) is currently underway, which will enable the stakeholders (government, civil society and supporting institutions) to take stock of the current situation and take necessary steps for mid course correction. It is envisaged that the result of the NCS MTR will provide a framework for future interventions in the areas of the environment and sustainable development. Moreover, it will also serve as a reference for prioritisation of projects and programmes in the given sectors.

The MTR exercise has three activity strands running across the process. Firstly, development of a database that contains data on all federal public sector developing plans as well as provincial annual development plans as they relate to projects within the NCS areas. Secondly, consultations on the public, private and NGO sectors on the changing context, progress and priorities in sustainable development, and finally, studies that would review NCS processes such as contribution of NGO's and private sector to NCS implementation, provincial strategies, environmental legislation, mass awareness, institutional development and financial resourcing.

1.2 Scope of Work

This present study is aimed at reviewing progress on institutional development envisaged under the NCS. TORs for the work were :

Review the written assessments of the institutions established under the NCS and the projects managed by these institutions, including :

- The Federal Ministry of Environment and its Units
- The Federal and Provincial Environmental Protection Agencies
- The NCS Unit within the Federal Ministry of Environment
- The Sustainable Development Networking Institute (SDPI)

- The Environment Sections at the Federal Planning Commission and Provincial Planning and Development Departments
- The International Union for Conservation of Nature (IUCN) in Pakistan
- Environmental NGOs
- Others

With key informants from other bodies (“Clients”) that are (or should be) working closely with the above, create a timeline of the institutions’ development and activities. This should specify key dates and changes, including associated legal developments and major projects/tasks.

Map the relations between these institutions themselves, and between them and the various sectoral and planning agencies which they are supposed to influence, especially those connected to the annual and national development plans. How is their influence exerted?

Present an analysis of :

- Responsibilities and mandate
- Rights and powers to carry out the above
- Rewards, resources, revenues, etc.
- Relationships with other bodies
- Opportunities not taken up yet, and constraints

It may be desirable to make a brief assessment of other institutional characteristics (transparency, accountability, etc)

1.3 Methodology

The methodology adopted for the study was as follows :

An extensive desk review was conducted based on already published reports and documents relating to the institutional aspects of the organisations and institutions to be covered under the review.

A series of meetings were held with individuals who had been involved in various capacities with the NCS. Meetings were also held with agencies that were specifically targeted in the NCS to be the subject of institutional capacity building. These included the provincial EPA’s, the NCS Unit in the Federal Ministry of Environment, the Pakistan Environment Protection Council, and others. In the case of provincial EPA’s, meetings were held with only two agencies, in the expectation that the issues identified would be representative, for the purposes of this study, of institutional issues that all agencies are being faced with. A similar strategy was adopted for other entities such as the Environment Sections in the provincial P&D Departments as well as being in the Planning Commission.

To address the issues of how these organisations exert their influence on other line or sectoral agencies, a framework, borrowed from management literature was utilised. A short note on this method, to enable the reader to better understand the type and nature of the influence that is being exercised, follows:

Briefly, the *sources of power* which underlie the *methods of influence* relevant to this report are (a) Resource power, where possession of valued resources is a useful basis for influence (b) Position power, or legal power, that comes as a result of the role or the position in the organisation. This usually manifests itself in rules and regulations being used as the influencing mechanism (c) Expert power is the power that is vested in someone because of their acknowledged expertise. Experts exert their influence by persuasion, by the force of logic.

Two other methods of exerting influence, both applicable in the case of the NCS, though not as overt as the above, are (a) Personal charisma, present in an individual, is a form of influence that must be acknowledged and (b) Modifying the organisational structures, incentive systems, managerial cultures, and other similar variables. This particular means of influencing behaviour is one that often has the most dramatic impact but is one that is very difficult to put into practice, changing as it does existing power relationships.

1.4 Organisation of the Report

The report is organised in the following fashion :

- | | |
|-----------------|--|
| Part I | This contains the introduction, background information, the methodology followed, and the TORs for the assignment. |
| Part II | This part sets forth the institutions and the institutional development arrangements that were envisaged in the NCS. |
| Part III | The ground realities. The developments on the ground, eight years after the adoption of the NCS are laid out in this part. |
| Part IV | Conclusions and Recommendations |

1.5 Acknowledgements

The report has been prepared by Aamir Matin and Aqil Shah, Deputy Coordinator and Research Associate respectively of the South Asia Sub Regional Resource Facility (SA-SURF) of UNDP. The assistance of Dr Asif Ali Zaidi of IUCNP, Ms Maheen Zehra, Coordinator of the NCS Mid Term Review process, Mr Jawed Ali Khan, Director, Pakistan Environment Protection Council is gratefully acknowledged. A number of persons were interviewed during the preparation of

this report (list attached as Annex D), whose insight and thoughts have provided much of the substance of this report.

The views expressed in the report are those of the authors and should not be taken to be the official position of the UNDP or of the individuals who were interviewed during the process of its preparation.

Part II

Institutional Development Envisaged in the NCS

2.1 General

The NCS is a comprehensive environmental policy document aimed at attaining sustainable development in Pakistan. Its three main objectives are:

- Conservation of natural resources,
- Sustainable development, and
- Improved efficiency in the use and management of resources.

To achieve these objectives, three key operating principles are identified:

- Achieve greater public partnership in development and management
- Merge environment and economics in decision making and
- Focus on durable improvements in the quality of life.

Developed by the Government of Pakistan in collaboration with IUCN, the NCS lays out a priority policy framework for national resource management and conservation through fourteen programme areas.¹ The implementation of this wide ranging action strategy is envisaged to be a collaborative and consultative undertaking amongst federal and provincial government agencies, non-governmental research and policy organisations, the private sector, financial institutions and donors.

Institutional development and strengthening is crucial for achieving environmentally sustainable development. Consequently, effective and efficient implementation of the NCS requires substantial capacity creation in government and non-governmental organizations. Since, policy decisions have long term and cross-sectoral effects, strategic coordination between government agencies and between these agencies and the private sector is equally crucial.

Recognizing the limitations imposed by budgetary constraints, shortage of professional staff and bureaucratic resistance, the NCS envisages institutional development and strengthening within government at four levels—federal and provincial leadership, increased inter-agency cooperation, enhanced departmental capacities and improved district level coordination. Institutional development must take place within the broader context of reorienting federal, provincial and local government policies to facilitate environmentally sustainable development.

¹ These included, inter alia, increasing irrigation efficiency, conserving biodiversity, increasing energy efficiency, developing renewables, preventing/abating pollution, managing urban wastes. 68 specific programmes were identified in the 14 programme areas.

During the first ten years of the NCS, institutional development and strengthening entails capacity creation and improvement within the federal and provincial Planning and Development agencies for integrating resource management and conservation in economic policy.² Also envisaged is increased inter-agency cooperation, improved departmental goals and mandates to facilitate resource conservation besides creation of capacity in the industry and trade sectors to identify, support/seek policy support for and implement environmentally compatible industrial policies/processes. The government is to provide incentives for resource conservation and use, enact consistent and equitable environmental regulations, and support local communities through community rights legislation.

2.2 Institutional Development

As outlined in the NCS, institutional development entails qualitative improvements to facilitate development and conservation of the environment rather than quantitative increases in departmental capacities to deliver managerial development. Accordingly, the NCS envisaged the establishment of an Environment Section for planning, project appraisal and monitoring in the Planning Division, with linked cells in the provincial planning and development departments to “meet the need for environment-economic policy analysis that can be integrated into plan making.” The key responsibilities of the environment section included the establishment of natural resource and environmental targets, scrutiny of policies and programmes for natural resource sustainability and environmental soundness and participation in the annual and five year planning processes of the government, and promoting environmentally sustainable development in the various sectors of the economy.

Capacity upgrading of the Environment and Urban Affairs Division (EUAD) (now Min of ELGRD) was proposed so that it could act both as a staff agency to the Pakistan Environment Protection Council and a secretariat to the Pakistan Environmental Protection Agency. The EUAD, supported by 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. 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.

² Proposed capacity creation and building covered capacity enhancement for environmental impact monitoring of large development projects during implementation and operations, integrating environment-economic policy analysis in the energy sector, promoting benign industry categories, clean technologies and vehicular efficiency etc.

An NCS unit in the EUAD entrusted with critical regulatory (and evaluation) responsibilities was envisaged. Its key responsibilities included, inter alia, ensuring the inclusion of the regulatory aspect of the NCS in capital and revenue budgets, collaboration with other ministries in the framing of environment related regulations besides screening of development projects for environmental soundness (a function it shared with the Environment Section of the Planning Commission). To create in-house capacity for environmental analysis in each concerned department and division, incremental induction of environmental analysts was also suggested.

In addition, the NCS included a general list of agencies that were to collaborate in the programming, extension, implementation and operation of all the 68 programmes. For institutional strengthening through enhanced inter-agency collaboration, the Cabinet, Establishment and Management Services Division, alongwith provincial (S&GADs) and management consultants were to review the external relationship protocols of the involved agencies to make coordination/collaboration a routine procedure.

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. The document outlined priorities for increasing collaboration such as between provincial irrigation and agricultural departments for increasing irrigation efficiencies, between EPAs and municipal authorities for the urban small industries waste collection and centralized treatment programme. Existing coordination forums like the National Economic Council were to be developed/strengthened to consider sustainability concerns in national development plans/programmes.

Recognizing the need for independent analysis and advice in support of NCS implementation, an independent, non-profit research institute—the Sustainable Development Policy Institute—was to be established in Islamabad.

Part III Ground Realities

3.1 General

A number of institutions form part of the environmental fabric of the country. Some existing institutions, such as the EPAs and the Environment Sections, have been strengthened as a result of the NCS whereas others, such as SDPI, have been set up from scratch. This study concentrates on those institutions that have (or were envisaged to have) the NCS as their primary focus. Others, such as the Ministry of Environment, which handles other related issues as well as the NCS, were thought to be outside the scope of the study, though the impact that they have on the NCS implementation is dealt with.

3.2 The NCS Unit

As laid down in the NCS document, (Section 11.5, Page 323), “A four person NCS Unit in the Ministry of Environment headed by a Joint Secretary should be set up in Year 1 of NCS Implementation. Its functions and critical role make it desirable for it to be the staff agency for the Pakistan Environment Protection Council.”

An NCS Unit was indeed set up immediately following the adoption of the NCS, with the following goals :

- To coordinate and monitor the implementation of the NCS activities.
- To mobilise donors support for NCS programmes and projects
- To sensitise and mobilise the Federal and Provincial governments and local bodies for NCS implementation
- To create awareness of environmental issues amongst the masses
- To provide secretarial services to policy making bodies
- To encourage participation of private sector and NGOs in the NCS implementation
- To manage the affairs of the NCS Unit in an efficient manner

The NCS Unit has not been able to carry out the rather ambitious tasks that had been envisaged for it under the document. This is not surprising, given that its location within the organisational structure of the Environment Division is less than optimal. The head of the Unit, the Joint Secretary (NCS) is at the same time the Joint Secretary (Administration) for the Environment Wing, a situation that has existed since the establishment of the NCS Unit. This implies that, due to demands that are placed upon his time by the day to day administrative issues, the JS is naturally not able to do full justice to the task of coordinating and monitoring the implementation of the NCS activities. In addition, there has been a rapid turnover in the incumbents of this position, with five individuals having held

this position in less than eight years. Over the years, a number of tasks that do not strictly fall within the mandate of the NCS Unit have been assigned to it. For example, the EPRC project was made the responsibility of the Deputy Secretary NCS, with supervision and monitoring of certain other donor funded projects also being handed over to the NCS Unit.

The Pakistan Environment Project had as one of its stated objectives, the strengthening of the capacities of the NCS Unit. This entailed, amongst other actions, recruiting technical experts for specific tasks. Five individuals were recruited under this project, after an apparently contentious selection process. Integration of these PEP funded positions with the regular staff of the Ministry has been a concern. Whilst these positions have now been shifted from the project to regular positions with the government, they have yet to be formally recruited through the Public Service Commission. Currently two out of these five individuals have left, whereas the remaining three intend to compete for the posts once they are advertised through the Commission.

Relationships and Influencing Mechanisms : The NCS Unit is neither able to exercise position power, nor expert power to influence other organisations within the environmental institution framework of the country. Sufficient resources are not available that would enable it to exert influence using this as a power base. Its relationship with the other entities within the Environment Wing of the Ministry is not at all clear, and a distinct impression emerges that this is a Unit that is not integrated into the mainstream work of the Ministry.

3.3 The EPAs

Consequent to the promulgation of the Pakistan Environmental Protection Ordinance, 1983, the Federal Environment Protection Agency was created the following year. This was followed by the creation of the Punjab EPA in 1987, the Sind EPA in 1989, and the Baluchistan and NWFP EPAs in 1990. Some of the tasks of the Federal EPA, as defined in the 1997 Pakistan Environment Protection Act, are :

- Administer and implement the provisions of this Act;
- Prepare national implementation policies for approval by the Council;
- Take all needed measures for the implementation of the national environmental policies approved by the Council;
- Coordinate environmental policies and programmes nationally and internationally;
- Promote public education;

The EPA, under the Act, also has the powers to ensure the enforcement of the NEQS. It functions as the implementing arm of the PEPC, and as such, has both monitoring as well as regulatory authority on matters related to the environment.

The provincial EPAs have been delegated, through their respective provincial governments, the powers to implement this Act within their jurisdiction, thus ensuring that the provisions of the Act are applicable throughout the country.

A number of donor assisted projects have attempted to strengthen the institutional capacity of both the Federal EPA and the provincial EPAs to carry out their assigned tasks. The EPRC project in particular was aimed at strengthening the Federal EPA by providing it with professional and support staff, vehicles, office equipment, technical books, training, technical assistance, and incremental operating costs. Similar arrangements were made to provide support to the Sind and NWFP EPAs.

In common with the experience of other projects when donor funding runs out, the EPAs too are faced with the issues of regularisation of staff, shortage of funds for recurrent activities, and the like. Whilst there are opportunities for generation of funds within the EPAs, such as charging for EIAs and for carrying out training courses, current financial regulations are such that resources generated by the EPAs are not able to be kept by the EPAs themselves. The capacities of the EPAs, in general, are not in line with the responsibilities that they have been delegated from the Federal Government. Each EPA does have achievements that it can point towards with pride, but on the whole there are many organisational issues that need to be resolved. These include staff concerns such as career development, more general concerns such as limited funds for carrying out mass awareness campaigns, lack of clarity in terms of reporting requirements, and low political will to support the activities of the Agency.

A concern of a more serious nature is related to the role of the EPAs as being responsible for coordinating environment policies and programmes. The location of these agencies within the government hierarchy does not appear to be consonant with this mandate. Administratively, the provincial EPAs are attached to their respective provincial departments. This structure is not conducive to their ability to coordinate policies, as the role of coordination is typically within the domain of the P&D Departments. In the case of those provinces that have Environment Sections (ES) within their P&D Departments, the ES may be better positioned to play this role.

The fact that the Environment portfolio, except for one province, is lumped together with a couple of others within one Department, mitigates against the mainstreaming of environmental issues. Anecdotal evidence suggests that the sectoral allocation mechanism followed in government places a bias on the nature of the projects that the Environment Department initiates.

The provincial EPAs, set up as they were before the completion of the NCS, reflect the diversity of the Departments they were initially placed under, and were naturally influenced by the thinking and policies of that Department. For instance,

recruitment rules in the provincial EPAs are different, with each still reflecting the legacy of its original parent department.

Some of the EPAs have ventured into implementing environment related projects themselves. This is perhaps not in accordance with their official mandate, which is primarily one of monitoring and regulating. Project implementation strains the already stressed capacity within the Agency, and long term functions are often sacrificed to the pressures of coping with day to day project related issues.

The influence that EPAs can and do exert over those sectoral and planning agencies connected to the annual and five year plans is limited to their participation in the various sectoral committees set up for these purposes. At the individual level, however, usually relying on their personal networking skills, EPA personnel have been successful in injecting environmental concerns in the overall planning process. These interventions have at times been more productive than the formal mechanisms of coordination and integration across sectoral boundaries.

Relationships and Influencing Mechanisms : The EPAs exert their influence through exercising their position power, in the form of rules and regulations. They are in turn influenced by the expertise found within the policy research institutes or by donor funded consultants. More recently the private sector has begun to influence the EPAs through industry associations and the like, where the power behind this type of influence is both resource as well as expertise. The EPAs relationship with the Council, that of being its implementing arm, ensures that their work, at least at the Federal level, is in tune with the overall direction laid down by the Council.

3.4 Environment Sections in the Planning Commission and the Provincial P&D Depts

National planning in Pakistan is based on a well established, bureaucratic planning and approval mechanism. Departments or Ministries develop their own project proposals, which are submitted to the provincial P&D Department or the Planning Commission in the case of the Federal Government. Sections with the P&D Departments or the Planning Commission, organised along sectoral lines, are responsible for carrying out technical and financial appraisals of these proposed projects. Depending on the cost of the project, it is routed to the appropriate authority for approval. Membership of these Working Parties, as they are called, varies, but it is mandatory for the section which is primarily dealing with the project to be represented in the meetings of the Working Party.

The Environment Section within the Planning Commission was set up in 1993, which is probably why it was not provided donor support through the EPRCP. This project did however aim to establish a new environment section within the

Punjab P&D to review proposed provincial public development expenditures with regard to environmental issues. Similar sections exist in the other provincial P&D departments each being supported to some degree with donor assisted projects.

Generic responsibilities of these Sections include:

- To formulate and review of policies and plans
- To screen and technically appraise projects
- To coordinate collaboration on environmental planning matters intergovernmentally and between governments and NGOs and private sector bodies
- To enhance environmental understanding and planning skills in federal and provincial agencies
- To service information requirements of the Planning Commission/Department and the international investment community

The experience of the Environment Section in the Planning Commission is perhaps representative of the sections in the provinces, and hence is worth examining in some detail.

A number of Deputy Chiefs have come and gone during the six year existence of the ES in the Planning Commission. With regards to its sustainability, suffice it to say that at the end of this period there is some danger that it might be merged with another section. Recruitment of consultants, funded under a donor project, has been slow in the beginning, but has picked up in later years. Counterpart staff has not been available, thus the expected transfer of skills and knowledge has not taken place as yet. The attitude of the regular staff towards the project funded staff is typically that found in other donor assisted projects, of resentment because of salary differentials on the one hand and of grudging respect because of specialist skills and knowledge on the other.

The Sections have been able to deliver on their promise to a certain extent. The various assessments of their work contain details of the successes of these sections. Suffice it to say here that the nature of the work in the sections is such that it lends itself well to being organised, executed and monitored, and that it is very much in line with the work that the Planning Commission or P&Ds had already been doing, though in other sectors.

Relationships and Influencing Mechanisms : The Environment Sections are able to influence annual and national development plans directly, given that this has been prescribed in the rules and regulations pertaining to their working within the government structures. It would appear that the policy research and advocacy entities are able to influence these sections to a large extent, given the specialist expertise that exists within these entities, and the fact that some of these sections are recipients of donor assistance, channeled through these research organisations.

3.5 Sustainable Development Policy Institute

SDPI was established as an independent NGO in August 1992 to serve as a source of expertise and advisory services on government, private sector and non-governmental initiatives in support of the National Conservation Strategy. SDPI, as one expert has observed, represents a “unique experiment” in Pakistan with the wide ranging scope of its mandate that includes research and analysis, policy advice, public interest advocacy, networking and information management.

Since its inception, SDPI has evolved into an effective platform for public debate and discussion on critical economic, political and environmental issues. It has thus created the much-needed intellectual “space” to the budding/burgeoning civil society in Pakistan. In addition, the institute has facilitated the flow of international institutional knowledge and research on sustainable development into Pakistan besides contributing seminal/original research on key public interest/policy/SD issues. SDPI has also been a productive training ground for Pakistani analysts and experts and has undertaken several projects in the programme areas recommended by the NCS.

As the assessment of SDPI carried out in 1998 through the CIDA funded Pakistan Environment Programme, concluded “Admittedly, the need to critically evaluate SDPI’s role in NCS implementation must be weighed against the entrenched systemic constraints under which it has to perform its functions. Successive governments have had little to show in the way of implementing the NCS—the key objective for which SDPI was established. While unfavorable institutional conditions do not necessarily preclude institutional development, they do put enormous strains on new organizations. It should be noted that Pakistan suffers from a systemic institutional decline at virtually all levels of government, no prototype institution on sustainable development/environmental management exists in the country and the practice of utilizing independent policy advice and analysis is unheard of in official circles. Hence the overall institutional context in Pakistan severely limits the capacity/ability of SDPI to work effectively towards better environmental governance.”

In the context of NCS implementation, SDPI has been criticized for its lack of vision and direction in its role in institutional strengthening under the NCS. Towards that end, it needs to further strengthen its working relationship with these entities and perhaps evolve a formal strategy supporting institutional strengthening in government units implementing the NCS.

Background interviews conducted during the course of this study with various NGOs and individuals concerned with environmental issues confirmed the impression that SDPI could be more effective if it was to concentrate on a few core issues such as water policy and forest management, rather than “spreading itself too thin”.

Relationship and Influencing Mechanisms : While SDPI has developed a broad range of institutional linkages in Pakistan, its ability to influence these institutions has been somewhat uneven. At times, it has directly influenced government policy. Championing certain environmental causes, both by arranging demonstrations and using the media innovatively, are examples of its ability to influence outcomes and also of the relatively high “nuisance” value that it carries. SDPI, by virtue of its expertise being recognised within government as being of high quality, is often able to exert influence directly by being part of the Environment Council, and other government committees, but also indirectly by the very effective seminar and lecture series that it organises on a regular basis. The personality of the first Executive Director of SDPI also seems to have contributed towards the success that SDPI has had in influencing its target organisations. SDPI has been influenced in its turn by the resource power available with the donor community.

3.6 IUCN-Pakistan

IUCN-Pakistan was established in 1985 to assist the Government of Pakistan in the development of a National Conservation Strategy (NCS). During its inception years, IUCN-P mainly liaised with government institutions and IUCN headquarters to support the strategy formation phase of the NCS. In the next four years, IUCN played a pivotal coordinating role in the formulation of the NCS and reoriented its project approach to a programme one. The fourteen core programme areas identified in the NCS were adopted by IUCNP as the basis for its programmatic themes. Having recognized the importance of actively promoting programmes outlined in the NCS for its own organizational development, IUCNP initiated a management review to put efficient management structures in place and decentralize management responsibilities.

In the post NCS phase, IUCNP has seen momentous growth in staff, funding, projects and programmes. These programmes have considerably enlarged IUCNP’s implementation portfolio in addition to widening its geographical coverage. IUCNP has actively assisted the development of provincial conservation strategies in the NWFP, Balochistan and the Northern Areas. By 1994, IUCN became actively involved in the institutional development component for the NCS through the Pakistan Environment Programme which also enabled it to secure funding for its thematic programmes. Subsequently, a second management review was undertaken to create a new more efficient management structure to suit the organization’s expanding size. This phase in organizational development was also marked by IUCNP’s entry into large-scale field level community development projects.

Under PEP, six IUCNP units have received support for institutional strengthening. These include the Programme Directorate, the Strategies and Support Unit, the NGO/Community Support Unit, the Business and Law Unit, the

Education Unit and the Communications Unit. As the PEP executing agency, IUCNP has to ensure, inter alia, that the overall focus on institutional strengthening is maintained and that allocated resources are mobilized, all project components and activities are properly planned, managed, implemented and monitored.

The IUCN is in the happy position of being both an executing agency for a donor supported project that aims to strengthen government institutional capacity, as well as itself being the target of a capacity building exercise. This has enabled it to “learn by doing” and it has utilised this opportunity to enhance its standing as an advocacy and research organisation.

Relationships and Influencing Mechanisms : IUCN is able to influence the environment debate in Pakistan by virtue of it being perceived by the other actors as possessing much needed expertise and specialist skills. In addition, its position as the executing agency of PEP places it in the unique situation of carrying both “resource” as well as “expert” power. Annual and national development plans are influenced both directly, by providing experts, and indirectly, by influencing the Environment Section in the Planning Commission. Having ventured into executing donor assisted projects, its standing as a source of impartial advice appears to have been diminished slightly.

3.7 The Corporate Sector

The NCS document addresses the issue of private sector involvement directly, and contains the following as one of its institutional development objectives:

“Creation of the capability in the leadership and consultative forums of organised industry and trade to identify, seek policy support for, and implement environmentally benign industrial processes, and to promote environmentally compatible products” (Page 316)

The Environment Technology Programme for Industry ETPI is probably the project that best reflects the type of corporate institutional strengthening envisaged in the NCS. Conceived purely within the private sector, the project succeeded in attracting donor support, and was launched in 1996 with the objective to “to promote the use of environmentally safe technologies for the production of environmentally safe products by Pakistan’s manufacturing/industrial sector. This will be achieved by adopting measures for pollution abatement, waste management and re-cycling, 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. The Programme will be implemented with the cooperation and involvement of all the chambers of commerce and industry and industrial associations in the country.”

The project has five components, but the one of particular interest to this study is the way it has gone about strengthening institutions and building public – private partnerships. It is the only project in the environment sector, or perhaps the entire development arena in Pakistan, that has given considerable thought to institutional bottlenecks and how these impact upon results that can be achieved. “Institutional networking” has been defined as “networking between private industry representative institutions, government environmental monitoring institutions, research institutions, local and international financial institutions, and market institutions. Institutional Network structures comprise of: (a) practice of inter-institutions negotiations, (b) common forums for discussions, (c) inter-institutions understanding for the specific roles, and (d) open working relationships among institutions.”

The relatively positive reception that ETPI has received can be attributed in part to (a) the pressure from consumers – resource based influence (b) persuasion by experts from within the industry and (c) the demonstration effect. The project has not been influenced by the coercive power of the EPAs to any significant extent.

In the words of one of the authors of the NCS, “awareness, empowerment, and linkages” were what had been envisaged as the cornerstone of successful NCS implementation. The ETPI has demonstrated that this approach, combined in part with the coercive functions of the EPAs, can indeed bear fruit.

Relationships and Influencing Mechanisms : The relationship of the corporate sector to the other actors in the sector is complex. It sees itself as being subject to regulatory controls imposed upon it unilaterally by government on the one hand. On the other, given its awareness of consumer concerns outside Pakistan, which have hurt business interests, the private sector realises that it has to work together with government to resolve these issues. A mutually supporting relationship, between industry, government and research institutes, appears to be developing, at least in the case of ETPI.

Part IV

Conclusions

4.1 General

The various entities envisaged in the NCS document that were either to be strengthened or newly established are in place and are operating with varying degrees of efficiency and efficacy. The impact that these entities have had in raising awareness, ensuring that environmental concerns take center stage, and some hopeful signs of real gains on the ground cannot be denied. This in itself should be a source of satisfaction for those who were involved in drafting the NCS. Further strengthening the capacities of these organisations to carry out their assigned tasks will no doubt lead to enhanced outcomes, but within the overall context of NCS Implementation, the real benefits will only accrue if the issue of NCS ownership is resolved satisfactorily.

4.2 Implementation

It comes as a surprise to note that the NCS document, prepared as it was after an intense, participatory, four year process that brought together top-notch experts from various fields related to the environment, does not deal with implementation issues with quite the same rigour as these deserve. In particular the lack of clarity on which entity or group of entities were to be responsible for the implementation of the strategy appears to have been instrumental in the relative lack of coordinated progress that has been made towards achieving the goals of the NCS. An “NCS Implementation Monitoring Committee” headed by the Deputy Chairman, Planning Commission was proposed in the NCS, but has not been set up to date.

The NCS Unit within the MELG&RD, established as per the recommendations of the NCS, was envisaged in the NCS “as the staff agency for the Pakistan Environment Protection Council”. The Council, as per the 1997 Ordinance, is empowered to “approve comprehensive national environment policies and ensure their implementation within the framework of the national conservation strategy”. The implementing arm of the Council is the Pakistan EPA. This implies that the Pak EPA should have the prime responsibility of furthering the agenda of the NCS. No doubt, the overall work of the Pak EPA is governed by the dictates of the fourteen priority areas of the NCS, but it appears that the Council, and by implication, the Pak EPA, has handed over responsibility of the NCS to the NCS Unit. This is borne out by the proposed agenda of the upcoming Council meeting, where the NCS is but one item of an otherwise crowded agenda.

To quote from the Staff Appraisal Report of the EPRC Project, written in 1992, “there is minimal coordination between federal and provincial ministries and line agencies. Past efforts to coordinate activities have been viewed by line agencies as being a threat to their own power structure”. Coupled with the recognition in the NCS, that “collaboration among agencies is required for programming, extension, implementation and operation of programmes in the core NCS areas”, this implies that the Council itself, and by implication the Pak EPA, must take on the responsibility for translating the planned goals of the NCS into reality. This will amount to mainstreaming the NCS into the national environment landscape. Delegating this task to a subsidiary unit within the Environment Wing of MELG&RD, as is presently the case, does not appear to have had the desired results.

Borrowing once more from the literature on the management of change, the results achieved so far are indicative of the fact that the institutional structure that promotes collaboration and cooperation has not as yet been put into place. While organisational capacities of individual agencies have been enhanced, the way they interact with each other, in the words of the NCS, their “external protocols” have not changed. There appears to be no evidence that any attempt has been made to address this issue whatsoever in any meaningful fashion. Bringing about change in the behaviour of the organisations that together form the institutional framework for the environment in the country requires a strategy that explicitly recognises and addresses the major issues it will have to face, the most important of which is the redrawing of the power relationships within government as well as with civil society and the private sector.

Annex C

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Annex D

List of Individuals Interviewed

1. Mr Faridullah Khan, ex DG EPA, Govt of NWFP, and currently with the National Highway Authority, Islamabad.
2. Ms Aban Marker Kabraji, IUCN Representative for Asia, Karachi
3. Brig (Retd) Akhtar Zamin, DG EPA, Govt of Sindh, Karachi
4. Mr Shahid Ali Lutfi, Dy Dir, EPA, Govt of Sindh
5. Mr Azharuddin Khan, EPTI, Karachi
6. Mr Ali Habib, Director General, World Wildlife Fund (WWF), Lahore
7. Mr Jawed Ali Khan, Director, Pakistan Environment Protection Council, Min of Env, Islamabad
8. Ms Maheen Zehra, NCS MTR Coordinator, Min of Env, Islamabad
9. Dr Asif Hussain, Director, EPA, Azad Govt of Jammu and Kashmir, Muzaffarabad
10. Dr Asif Zaidi, Head, IUCNP, Islamabad Office, Islamabad
11. Mr Asad Sibtain, Deputy Secretary, NCS Unit, Min of Environment, Islamabad
12. Dr Ayub Qutub, Director, PIEDAR, Islamabad
13. Mr Mazhar Tawawala, External Monitor for ETPI, Royal Netherlands Embassy, Islamabad
14. Mr Abdul Qayyum, Deputy Chief, Environment Section, Planning Commission, Islamabad
15. Ms Razina Bilgrami, Chief, Environment Unit, UNDP Islamabad