Integrating the Environment?

Environmental Considerations in Sida's Work

Kerstin Brunnström Hans Hargbäck Per Lagerstedt Jan Olsson



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Foreword

The present report evaluates to what extent Sida's policy on integrating environmental concerns in its work has been been effectively implemented. The report concerns both this specific policy area and contributes to understanding of the processes and mechanisms of policy implementation in general in Swedish development cooperation.

The consultants have considered a wide range of material: interviews with Sida staff and partners, project documentation, field visits to six Swedish embassies or section offices in the field, and a large number of the organisation's policies and strategies. Their main finding is that while there are a number of positive elements, there is also considerable scope for improvement. In spite of the intentions of the policy, many projects, strategies and policies do not include environmental considerations.

Sida does not appear to be supporting projects that have a direct and negative impact on the environment. However, the evaluation points to a failure to consistently attempt to integrate and add environmental concerns and dimensions to Sida's work in general. Too often, environmental issues are treated as separate, or solely being seen as a case of precluding the most evident negative impacts. The evaluation identifies factors that can explain these negative findings and in this regard sheds light on general difficulties linked to a mainstreaming approach to policy implementation.

Sustainable development is an important aspect of Swedish development policy and environmental issues are at its core. Sida has a position as a pioneer for such issues which can give the organisation a central role in this regard. However, in order to maintain that position, Sida needs to continuously develop and improve its work in this area.

Eva Lithman

Director

Department for Evaluation and Internal Audit

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List of Abbreviations

ÅF Process AB (the consultants)

AFRA Department for Africa, Sida

ASIEN Asia Department, Sida

DESO Department for Democracy and Social Development, Sida

EA Environmental Assessment

EDA Environmental Dimension Analysis

EIA Environmental Impact Assessment

EMS Environmental Management System

GD Director General

HR Human Resource

HQ Headquarter (Sida Stockholm)

INEC Department for Infrastructure and Economic Cooperation, Sida

LAMP Land Management Program

MKB See EIA

NATUR Department for Natural Resources and the Environment, Sida

OECD The Organization for Economic Cooperation and Development

NGO Non-Governmental Organization

NPO National Program officer

PO Program officer

POM Department for Policy and Methodology, Sida

PSD Private Sector Development

QA Quality Assurance

RELA Department for Latin America, Sida

RRD Resource Centre for Rural Development (RRD) in Nairobi, Sida

SAREC Department for Research Cooperation, Sida

SEA Strategic Environmental Analyses

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SEKA Department for Cooperation with NGOs,

Humanitarian Assistance and Conflict Management, Sida

SENSA Swedish Environmental Secretariat for Asia

SME Small- and Medium-sized Enterprises

Sida Swedish International Development Cooperation Agency

Swedbio Swedish International Biodiversity Programme

ToR Terms of Reference

UD Foreign Ministry

UN United Nations

UTV The Department for Evaluation and Internal Audit, Sida

VCCI Vietnam Chamber for Commerce and Industry

WHO World Health Organization

WTO World Trade Organization

Executive Summary

The Objective

The main purpose of the evaluation is to assess and to provide information about the extent that Sida integrates environmental considerations into its work.

The evaluation is based on three integrated assessments:

- How Sida integrates environmental issues in its policies, guidelines and other documents.
- How Sida's Program Officers (POs) and managers deal with environmental integration in their daily work.
- How Sida as an organization implements integration of environmental considerations through its Environmental Management System (EMS).

Methodology and Scope

The evaluation team consisted of four team members. A major part of the evaluation is based on the results of visits to six offices and embassies with Sida representation. Three of the embassies: Bolivia, Tanzania and Vietnam are largely independent and are so called delegated embassies (with the right to make their own financing decisions up to 50 MSEK), one embassy (Uganda) has partial delegation, and two are smaller offices with more limited responsibilities: Albania and Kosovo. In total 56 persons/functions in the field were interviewed, representing Embassy and Sida staff, country cooperation units, international donor coordination bodies, Swedish NGOs and contribution owners.

The other major evaluation component consisted of interviews with staff at Sida's headquarters in Stockholm. In total, 45 interviews were made with POs and managers representing all Sida's departments.

The third evaluation component was a document study implemented to verify if Sida's documentation gives a solid base and firm support to the implementation of the environmental policy. The document review covered contribution documentation, country strategies, policy- and sector- documents and position papers. Also, a number of documents from other sources considered relevant for the evaluation were reviewed. The review covered in total; 89 contributions at the field offices, 46 current and 19 past country

strategies, 70 Sida documents, 28 evaluations of Sida contributions/activities and 13 non-Sida documents.

Environmental Integration at Sida

Strong components in Sida's work with environmental integration

In contributions with potentially direct environmental impact, Sida's organization largely complies with the environmental policy regulation. All interviewed POs understood that Sida must not get involved in contributions that may cause serious environmental degradation.

Weak components in Sida's work with environmental integration

In contributions with only indirect environmental impact or no/small environmental impact, which constitute a majority of the contributions, Sida's organization does not manage to comply with the intentions of the environmental policy. Environmental issues are not integrated but rather incorporated as a separate issue in some contributions.

The environmental analysis is focused on verifying that the contribution does not bring about any negative environmental impacts. The practice could be defined as a "No Harm"-approach. The wider context of environmental integration as described in Sida's documents is not understood by members of the organization and not by contribution owners and representatives for the cooperation countries. Possibilities to achieve positive environmental effects of development activities are mostly missed out.

For support that passes through other donors and NGOs, Sida has not managed to ensure compliance with its environmental policy.

For support that goes through programs or budget support, Sida has not managed to ensure compliance with its environmental policy.

Causes

POs are aware of the environmental policy but not familiar with its contents, requirements, or where to find it or how to implement it. There are different opinions among POs about which subjects are considered mainstreaming issues. Not all POs consider environment to be such an issue.

POs have a large number of requirements to fit into the same contribution and at the same time a pressure from the management to minimize the time spent on administration. Prioritizations are being made and integration of mainstreaming issues is not first on the list.

None of the interviewed local project committees has ever sent back a contribution for review due to inadequate integration of environmental issues. The observation does not regard the quality of the integration of environmental issues, only that the local project committee does not seem to prioritize environmental mainstreaming and is not used in a way that would guarantee a good quality of the integration.

Environmental Focal Points do not; promote integration of environmental issues actively, normally assist the PO with the integration during the preparation of a new contribution, or participate in an international network of focal point for exchange of experiences and arrange thematic seminars or workshops.

Explanations

Sida has created an overall environmental policy but has not broken it down into targets possible to apply on the contribution level. Concrete steps towards the stipulated goal are not defined. POs in general do not understand how to apply the environmental policy.

The managers, at the HQ and locally at the delegated embassies, do not prioritize and promote integration of mainstreaming issues.

Sida is not a learning organization when it comes to integration of environmental issues. Experiences gained during one contribution preparation process cannot be used by another PO preparing a similar contribution. There is neither networking, nor mainstreaming seminars, nor are there workshops to share and compile best practices and good examples.

There is no regular follow-up of integration of environmental issues at the delegated embassies, nor of policy implementation, nor of compliance with the EIA-regulation and not of environmental concerns in the contributions. The follow-up of integration of mainstreaming issues at HQ and field offices is irregular and almost non-existent, a fact that naturally severely impacts the quality of the mainstreaming of environmental issues. Finally, there are no indicators that allow for follow-up of effects of the environmental policy in sector- or budget support.

Sida is promoting implementation of EIA heavily and has an ambitious EIA regulation, a combination that in practice counteracts integration of environmental issues as it leads to a focus on negative physical impact and creates the impression that the environmental policy consists only of EIA.

Another major issue is that contribution owners and cooperation country partners do not profoundly understand the idea and benefits of integration of mainstreaming issues. They accept it in project plans when required by Sida, but in their implementation they avoid it.

Conclusions

For successful implementation of the environmental policy, a structured approach is needed. A management system, as Sida's EMS, is a tool for a systematic implementation and improvement of an organization's performance regarding a specific issue. Although Sida has introduced an environmental management system, it is not used fully to support implementation of environmental considerations. Major components of a standard EMS, such as Targets, Outcome, Audit, Follow-up and Continuous Improvement are not included in Sida's version. Targets have not been found in the implementation of environmental mainstreaming, neither at the contribution or program level, nor at an overall level.

General and specific goals within a management system tool do not only point in the desired direction, demonstrate ambitions and define results and deadlines to obtain, but also give a basis for regular monitoring and evaluation for the continuous improvement. Goals are also important for the communication of the expected outcome to everyone involved in the implementation phase. Formulation of environmental targets in specific contributions would provide for a more continuous treatment of environmental aspects, including the positive ones, than what is presently the case when environmental integration is handled mainly in an EIA. The lack of follow-up is a major reason for the weak implementation of the environmental policy.

Mainstreaming factors are usually derived from common Swedish values and norms, while the situation in partner countries varies considerably. There is often a great gap between policy and practice, which has to be overcome. In this study, it was found that contribution owners and representatives from the cooperation countries in general have a limited understanding of environmental mainstreaming. For them, as for many of Sida's POs, the "No Harm" approach dominates. The Swedish policies are widely recognized during evaluation interviews, but during actual implementations they are almost completely disregarded. The awareness has not yet reached the point where it is possible to grasp the positive effects of integrating environmental (and other mainstreaming) issues.

The increasing use of budget, basket and sector funding creates concern about how Swedish priorities and cross-cutting issues could be maintained when "diluted" into a common standpoint from many donors. The new situation will require other skills from the staff, such as more competence in dialogue and networking.

The connections between poverty and environment have been described in general terms in documents developed by Sida. It is clear that poverty constitutes a serious threat to the environment and that environmental degradation could hamper social and economic development. Still, in many practical situations, the positive connection between environment and development is not visualized. Instead, the "No Harm" approach is prevalent. There are few

examples of integration of environmental issues in other sector policies and guidelines.

That the mainstreaming issue is on top of the agenda helps of course to gain understanding and motivation for its implementation. High actuality often implies that there are more resources available for cooperation. The interviews for this evaluation have uncovered a situation where the relative importance of environmental considerations within Sida has decreased.

An environmentally sustainable development is clearly a priority in the Swedish governmental policy for international cooperation and development. Sida's central documents also underline that environmental sustainability is one of the corner stones for poverty reduction. It is when central guidelines are to be implemented in the field, and environmental issues have to share the space with many other issues, that there is a gap between intentions and practice. A majority of the POs mentioned during the interviews that they do not feel that Sida promotes environmental integration especially. There are no signals from central or local management, other than the flow of documents, that integration of environment is a central issue for Sida. On the contrary, there is rather a lack of support, by the management, for the issue. That there is little coordination between central policies and mainstreaming issues is another complication, as all these issues have their specific advocates at the headquarter level. Sida's tradition of consensus building rather than strong central directives and infrequent follow-up of indicators other than economic performance may also be factors explaining the current mainstreaming implementation performance.

The environmental analysis, performed as a part of the preparatory work for the country strategy, has to a varying degree been included in the final version. In many country strategies, there is no reference to the environmental situation whatsoever. This evaluation study of environmental mainstreaming highlights the importance of getting enough information about environmental legislation, institutional capacity and general awareness in the partner country for implementing environmental measures and being able to design and introduce contributions that will increase the national capacity.

Sida has a heavy focus on EIA and negative environmental impact in its policy implementation strategy. There is a focus on negative environmental impacts in the guidelines for assessment of EIAs. The EIA Helpdesk, the major source for expert support with environmental mainstreaming, is focused entirely on EIA and follows the guidelines closely. The available training in environmental mainstreaming of POs are focused on EIA assessment. In the field several examples have been observed of how negative environmental impacts of rather small significance have occupied staff and consultants, while positive effects, national priorities and viewpoints are much less apparent.

Mainstreaming of environmental issues is a complex and difficult task in international aid. Evaluations of other European donors (Danida and EU, for example) indicate similar problems to the ones identified in this evaluation.

Recommendations

The recommendations of the evaluation are:

- Break down the policy into concrete and understandable goals
 The POs must be helped through a policy broken down into pieces easier to digest, the implementation goals must be understandable and concrete.
- Integration

Sida should further assist the POs with how to integrate the various mainstreaming policies in a concrete manner and develop a summarized support for how to achieve a balanced mainstreaming process.

Integrate mainstreaming in sector policies

The environmental theme should form part of all sector policies and not be a separate issue. POs carefully read the sector policies relevant for their work and mainstreaming must naturally form a part of the sector policy just as it should be a natural part of contributions.

Introduce a screening process

A screening process for all projects should be introduced. It should lead to the division of contributions into two categories; projects that need a complete environmental impact assessment, and projects that need, what ÅF here calls, an environmental dimension analysis, where risk for negative impact is less prominent and factors combining development and environmental sustainability are in focus. The process should relate to the country, or cooperation, strategy and prioritize the environmental aspects that are most relevant for the specific situation.

Improve monitoring and follow-up

Sida should introduce a monitoring and follow-up system of mainstreaming and environmental integration. Presently the lack of standardized follow-up of the environmental integration makes it difficult to improve the system as information on its present operation is unavailable. Also, the lack of follow-up has created a feeling among many POs that mainstreaming is less of a priority. The follow-up should be organized through the environmental management system.

Improved support for POs

The implementation tools must be made easier to use and the expert functions strengthened. The focal point and the EIA Helpdesk could give better and wider assistance and usage of experiences from earlier Sida contributions internationally could facilitate the contribution preparation process considerably for the single PO.

Make the responsibility for mainstreaming clear

The responsibility for mainstreaming must form part of the management responsibilities in a direct way. In the present system the POs have the main responsibility while the managers have general overall responsibility for the operation and total quality. This has lead to a lack of prioritization of mainstreaming issues.

1 Introduction

1.1 Background

The purpose of the evaluation is to assess and to provide information about the extent to which Sida integrates environmental concerns into its work.

The task is defined in the Terms of Reference (ToR, enclosed as Appendix 1) and was further detailed through frequent discussions with the steering group at Sida during the course of the project.

As part of the task the evaluation has taken into account possible changes over time and how mainstreaming is handled at Sida in general (through comparison with other mainstreaming factors, specifically gender equality and HIV/AIDS) and ÅF has been considering differences between Sida's various departments in relation to the quality of integration of environmental issues

1.2 Methodology

The evaluation is based on three integrated assessments:

- How Sida integrates environmental issues in its policies, guidelines and other documents.
- How Sida's Program Officers (POs) and managers deal with environmental integration in their daily work.
- How Sida as an organization implements integration of environmental concerns through its Environmental Management System (EMS).

Practically, the evaluation was divided into four main phases:

- 1. Phase one was a study of Sida's policy and other steering documents relevant from an environmental and mainstreaming perspective. The main focus of this phase was on:
 - Country strategies and in some cases preceding country analyses
 - · Policy documents, especially sector policies
 - Steering documents for the environmental management system
- 2. Phase two consisted of interviews of Sida's POs and managers at the Stockholm Head Quarters (HQ).
- 3. Phase three was a study visit to selected field offices where field personnel and representatives from local governments, institutions, Non Gov-

ernmental Organizations (NGOs) and project owners were interviewed and selected project documentation reviewed.

4. Phase four consisted of analysis and reporting.

During phase one, the extent of environmental consideration and integration in the documents was assessed. The evaluation of the country strategies was used for selection of countries to visit for field studies. The documents of the Environmental Management System (EMS) were analysed as was the organizations' work with the implementation.

During the second phase, a number of interviews took place with staff at Sida's headquarters in Stockholm to assess how environmental issues are treated in the daily work. In total 45 interviews were made with officers representing all Sida's departments. A list of all persons interviewed can be found in Appendix 2. The results were summarized and assessed in a progress report, which created the basis for the phase three field studies. The interviews at Sida HQ took place October–December 2005.

During the third phase, field studies were carried out in Vietnam, Tanzania, Uganda, Bolivia, Albania, and Kosovo. The selection was based on the analvsis of the country strategies and on discussions with Sida personnel. The Sida offices in Vietnam, Tanzania, and Bolivia are so called "delegated embassies", signifying that most of the administration is managed locally while the other three country offices are managed from Stockholm HQ. The visits to the delegated embassies involved more extensive interviews and document studies. A list of all persons interviewed is provided in Appendix 3. The other three country visits were shorter and more focused on verification of specific matters. The visits elicited a coherent picture of how the steering documents are understood and used by local staff and partners. Also, the evaluation team specifically studied the country office personnel's application of multilateral activities to assess how Sida's environmental strategy would work with potentially fewer contributions in form of projects and more budget-, basketand program funding. The field visits took place December 2005-March 2006.

In the fourth phase, the results from the preceding three phases were aggregated, interpreted, discussed, and validated through complementary interviews. Observations, conclusions and proposals have been tested on members of the steering group and summarized in the final report.

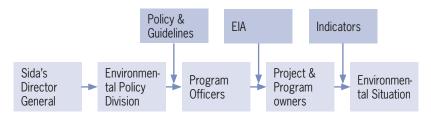
1.3 Assumptions

1.3.1 Sida's environmental integration strategy

Sida's environmental strategy, as it appears in the environmental policy, is to integrate environmental issues in all contributions, often referred to as main-streaming. The ultimate goal would naturally be to achieve improvements in the environmental situation and management of resources in the partner countries. It is also an objective for Sida to avoid contributing to any kind of environmental damage. The strategy assumes that environmental concerns are considered in Sida's contribution decisions, as well as in decisions and implementing measures taken by the partner country.

Sida's environmental integration strategy could be visualized schematically as a chain of effects, as in figure 1–1. Integration means that environment will have to be included as a natural element in all decisions and activities. The implementing instruments are presented at their respective place in the process.

Figure 1-1. Sida's environmental integration strategy



1.3.2 Environmental Mainstreaming

One question that appeared early during the evaluation was whether integration, or mainstreaming, really is an efficient way of increasing environmental considerations in international cooperation. Our view is that there is no other effective way to enforce environmental considerations than to include them in the actual work in all sectors, in spite of the risk that environmental issues will not be visible to the same extent as when they are treated separately.

1.3.3 Validity

Sida is a complex organization with a wide spectrum of contributions in a high number of countries. It is a challenge to make an assessment of the integration of environmental issues which could be considered representative for all activities in all the countries, draw conclusions, and make relevant recommendations. Obviously, it is necessary to base the evaluation on a selection of countries, personnel and contributions. Together with Sida UTV

(Sida's Department for Evaluation and Internal Audit) the consultants have made a selection that we believe gives a representative picture of the present situation. We interviewed approximately 10% of the personnel working actively with programs, projects, strategies and planning in Stockholm and all but two department managers and visited six field offices (out of almost 50) covering all regions and reviewed project documentation from 90 projects (of almost 6,000 annually ongoing). At the visited field offices all personnel dealing with program and project preparations and decisions, available at the time for our visit, were interviewed. Together with the fact that the observations from the different offices showed a great concordance, this has led us to believe that we have a good idea of the present situation and a good understanding of the system.

1.4 Composition of the Report

The material from this study is extensive and contains many observations, explanations, interpretations and recommendations. It has been our aim to summarize this in a report, which is comprehensible to a reader with neither previous knowledge of Sida's administrative systems and functions nor professional knowledge in environmental issues.

To facilitate for the reader the structure of each of the report's five chapters is presented and discussed below:

Chapter 1

Chapter 1 contains a presentation of the task and a discussion on how ÅF defines it. Also, presented in chapter 1 are the selected methodology and the approach used when implementing the evaluation. Finally, there is a discussion of some assumptions and the validity of the results. A presentation of earlier studies on integration of environmental issues is found last in chapter 1.

The objective with chapter 1 is to give the reader an idea of where ÅF started the evaluation and to share our common bases with the reader, to guarantee that we have the same starting position.

Chapter 2

Chapter 2 presents the various instruments and methods, which Sida uses to integrate environmental issues in all their contributions. The Environmental Policy is presented together with the implementing strategy and the tools Sida provides as support for the POs in their work to apply the policy. The policy forms part of the Environmental Management System (EMS), which in its entirety is described in chapter 2.

Chapter 2 is a pure presentation of Sida's own materials and does not contain any kind of discussions or other type of subjective information. The

objective with chapter 2 is to give the reader an understanding of Sida's environmental policy and how it is to be implemented through Sida's EMS.

Chapter 3

Chapter 3 contains a presentation of how integration of environmental issues has been achieved. It consists of observations made by the project team, with focus on the situation in the field. A more exhaustive description of the experiences from the field studies is found in Appendix 10, "The Field Perspective".

Field Quotations

From Chapter 3 and onwards the running text has been adorned with exact quotations from the field, simply titled "Field Quotations" and always given in boxes. These are remarks that ÅF has found illustrative. We believe that the sum of all quotas will give the reader a better understanding of the situation in the field and that they will add to the understanding of suggested explanations and conclusions. However, the quotes must be regarded as adornments and no conclusion can be drawn on the basis of a single detached quote.

A Simple Fact

A few facts that were found to be difficult to include in the running text and less central to the observed causes, explanations and conclusions have are presented in white boxes under the title "A Simple Fact".

Chapter 4

In Chapter 4, the main causes for deficiencies in integration of environmental considerations in Sida's activities are identified. Chapter 4 brings up the direct causes to the identified deficiencies, while explanations are presented in Chapter 5.

Chapter 5

Chapter 5 is reserved for a more profound discussion about the underlying causes for non-compliance with Sida's commitment to environmental main-streaming. The discussion is based on the interviews with Sida staff and stakeholders and the project team's own experiences. The explanations cover important conditions for implementation of the environmental policy, in the form of circumstances in Sida's organization, the functioning of Sida's steering documents, and the implications of the situation outside of Sida's organization.

Chapter 6

Chapter 6 presents a discussion around possible success factors for mainstreaming in general, based on our experiences and analyses during the evaluation. Also included in the chapter is a summary of conclusions about important features and possible success factors of mainstreaming based on this evaluation and the evaluations of two other mainstreaming issues; gender equality and HIV/AIDS.

Chapter 7

In Chapter 7 considerations and recommendations are presented, attending the problems observed and discussed in the earlier chapters. The recommendations are presented in a structure that closely follows the structure of Sida's policy flow, presented in chapter 2 in order to show the position of the proposed measures in the chain of implementation.

Appendices

Complete observations and more detailed discussions are presented in 11 appendices. Two of the appendices are detailed separate reports, no 5 (Review of selected Sida documents) and no 10 (Field study report) while the others present complete lists of reviewed documents (no 4, 6 and 9), interviewed persons (no 2) and tables of results (no 3, 7, 8 and 11). The ToR for this evaluation is presented in appendix 1. Below a complete list of the appendices:

Appendix 1 Terms of Reference

Appendix 2 List of interviewed persons

Appendix 3 Environmental Considerations in Sida Evaluations 2005

Appendix 4 List of reviewed Sida documents

Appendix 5 Review of selected Sida documents

Appendix 6 List of other reviewed documents

Appendix 7 Review of Country Strategies

Appendix 8 EIA Definitions

Appendix 9 List of Reviewed Projects

Appendix 10 Field Study Report

Appendix 11 Recent evaluations of environmental mainstreaming in other organizations

Of these, appendices 1, 2 and 10 are printed in this report, while the remainder is included in the attached CD-Rom.

1.5 Earlier Studies

Two former evaluations have been made of Sida's integration of environmental concerns, one in 1996 and one in 2002. However, these studies were less comprehensive then the present one and were limited to evaluation of environmental integration in Sida Evaluation reports.

The 1996 evaluation

"The Environment and Sida's Evaluations" from 1996 was a document study, which examined how environmental performance was addressed in 66 project evaluations. The importance and relevance of environment was scored according to a 4-point scale. The total average scores were 1.6 for the Terms of Reference and 1.8 for the evaluations themselves. The assessed potential impact on the environment was 2.6. This showed a discrepancy between the presumed need and the effectuation of environmental assessment in evaluations. The study also found that only three of the projects included the mandatory Environmental Impact Assessment (EIA) before project initiation. Also, there was little sign of indicators and monitoring systems to follow up the environmental impact. The conclusion was that Sida's evaluations, in general, ignored environmental effects.

The following recommendations were given:

- It should be stressed in all ToRs that an EIA must be performed;
- Sida should be stricter in requirements and control of compliance during all the steps in the contribution cycle, with special focus on the early steps of identification, planning and appraisal.
- Sida should increase the use of baseline studies, evaluations of cost-efficiency and monitoring systems.

The 2002 evaluation

The 2002 evaluation, "Environmental Considerations in Sida's Evaluations Revisited", examined 40 project evaluations from 2000 and 2001. Also, this study reviewed the presence of environmental concerns in the ToRs and evaluations in relation to the relevance of environment in the project. It also included a study of how environmental issues were handled in the daily work at Sida.

It was found that little improvement had occurred since the 1996 evaluation. EIAs were absent in many project evaluations, even for projects that did have an environmental impact. There was still a lack of cost-efficiency data, monitoring, and requirements of environmental competence in the evaluation teams. The knowledge about the requirements among Sida's personnel remained insufficient.

Further, it was found that POs, evaluators, and implementing consultants assessed environmental effects differently. The requirement to assess negative

environmental effects led to the fact that environmental issues were regarded only as problems rather than possibilities. It was stated that the personnel had been trained, but it was questioned whether the training had been adapted and relevant. Finally, some comparisons were made with mainstreaming of gender equality.

The study concluded that the implementation of the policies into practice was problematic and defective. Possible causes mentioned were unclear requirements and responsibilities, lack of environmental knowledge, personnel overloaded with work and lack of incentives. The given recommendations included:

- To introduce more efficient training courses and working methods;
- To develop stricter control and directives from the central level;
- To produce a manual and checklists for evaluations;
- To make use of incentives to improve the compliance; and
- To conduct further studies of how EIAs in earlier contribution preparations have been effectuated.

Correlation of this evaluation with the 1996 and 2002 evaluations

The evaluation presented in this report follows the preceding studies in the assessment of how EIAs are used for integration of environmental issues and how environment appears in project evaluations. One of the tasks is to see if there has been any improvement in how Sida works with environmentally sustainable development during the last 10 years.

However, this time, the evaluation is not limited to assessment of the compliance only, but directed towards a deeper understanding of the reasons why integration fails. The field studies and interviews supplement the document studies, while broadening the perspective and giving more information about the problems experienced, and how they could be addressed.

1.6 Recent Evaluations of Environmental Mainstreaming in other Organizations

At least two studies have recently been published on mainstreaming of environment in aid cooperation. The Danish Institute for International Studies has presented "Integrating Environment as a cross-cutting issue in Danish Development Assistance", 2005, and the European Union has submitted "Special Report No 6/2006 concerning the environmental aspects of the Commission's development cooperation", together with the Commission's reply. Both studies give relevant information on subjects discussed in this report. The findings are discussed in Chapter 6.13 and a summary is presented in Appendix 11.

2 Sida's Work withEnvironmental Integration– in Theory

In this chapter, the various instruments and methods that Sida uses to integrate environmental issues in all contributions are presented to help the reader understand what has been evaluated. It is an simple presentation of facts without interpretations, discussions or conclusions.

The hierarchy of Sida's environmental integration structure includes the following components:

- The Environmental Policy (herein the Policy);
- The Environmental Management System;
- The policy implementation strategy; and
- Support for policy implementation.

An essential remark is that we consider Sida's environmental policy and Sida's strategy for implementation of the policy to be two separate items, strongly interconnected, but not united.

2.1 The Policy Flow

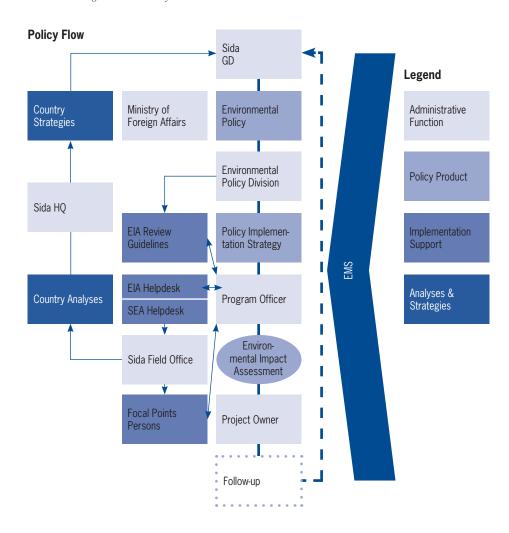
The environmental policy and its implementation can be visualized through a policy flow diagram where the involved parties, produced items, and available support can be presented together and show how they relate to each other. In the following, observations, explanations and recommendations are related to the policy flow to show their connections and implications in a comprehensive way.

The Policy originates from Sida's Director General, founded on national objectives from the parliament. The policy document also formulates the strategy for implementing the policy. The Environmental Policy Division transforms the policy into implementation guidelines to be applied by the POs during the preparation process for a contribution. The PO informs the cooperation partner about the requirements to perform an Environmental Impact Assessment (EIA), verifies that it has been performed, and reviews the quality.

Sida HQ offers all POs assistance for implementation of the environmental policy in form of two external helpdesks, one EIA Helpdesk in Ultuna and one Strategic Environmental Analyses (SEA) Helpdesk in Gothenburg.

It should be noted that there is no system in place for defining indicators for follow-up, no qualitative monitoring of the effects of the policy implementation, and no quantitative measuring of the compliance with the policy implementation regulation. In the figure below, the policy flow is depicted with unbroken lines. Dotted lines signify non-existing flows.

Figure 2-1. The Policy Flow



2.2 The Environmental Management System (EMS)

Sida's environmental management system has been in place since 1996. The system's approach is expressed as: "Sida's environmental management system focuses on *cooperation for sustainable development from the environmental perspective*, but is based on the broad definition of sustainable development, with a close link between ecological/environmental and economic, social, cultural, and political aspects. The large number of complex relationships between poverty and the environment must be given special attention, as well as the linkage between environmental issues and other developing issues such as economic growth, trade, conflicts, democracy, human rights, gender equality, and education."

The system consists of the environmental policy, general objectives and action plans at department levels.

2.2.1 Goals

Sida has not defined specific goals, with reference to the following: "Sida has chosen not to stipulate detailed environmental goals for its programs of support of various operational areas, since the development cooperation is highly diversified with several thousand contributions in a large number of fields". ²

2.2.2 Activities

The environmental management system includes a list of activities formulated by Sida's departments and assigning a number of more specific tasks for each unit in order to support the work with environment. These actions shall be achieved during a certain time period and are followed up on an annual basis.

There are 170 different activities for 36 different departments and divisions within Sida.

2.3 The Environmental Policy

The foundation for Sida's integration of environmental issues is the environmental policy. It expresses the commitment of Sida to follow national objectives and international agreements for an environmentally sustainable development. The policy also lays down the strategy for environmental considerations at Sida; to integrate environment in all Sida's contributions.

Sida's Environmental Management System: Policy and Action Plan for Environmentally Sustainable Development: April 2004, p. 6, emphasis in original.

² Sida's Environmental Management System: Policy and Action Plan for Environmentally Sustainable Development: April 2004, p. 10.

The objective for Sida's handling of environmental issues is sustainable development, expressed in its broad definition with a close link between ecological/environmental and economic, social, cultural and political aspects.

The policy presupposes good management of natural resources and protection of the environment. This objective has a clear connection to the overall objective of Swedish international contribution and cooperation to combat poverty. Natural resources constitute the basis for human living and development and environmental degradation does harm poor people in particular. The policy underlines that the way to achieve the goal goes through strengthening the partner countries' own capacity to improve their environment and to better manage their environmental resources; Sida alone cannot create a better environment.

The policy states the following:

- The environmental perspective must be included in Sida's overall development analysis and in its country, sector, program and project analyses.
- Sida should refrain from contributing to activities, projects, and programs that obstruct sustainable development.
- Environmental awareness and environmental consideration must be treated in the work of Sida's departments, field offices, and embassies in which development cooperation activities are integrated.
- All Sida's contributions shall contain an EIA.

2.3.1 Validity

All Sida's contributions are comprised by Sida's environmental policy. There is no principal difference between projects, program-, sector- and budget support. The policy and its rules for implementation remain the same irrespective of the size and form of the contribution.

2.3.2 Responsibilities

The responsibility for integrating an environmental perspective in the contributions is decentralised at Sida. The policy states that "All heads of department/divisions, POs and others are responsible for the environmental issues within their own particular areas of responsibility and for ensuring that there is requisite expertise in the departments, fields and embassies." ³

The environmental policy division has the responsibility to develop a strategy for the implementation of the environmental policy and to supply necessary supportive tools. The division publishes the implementation strategy and supplies the tools to all Sida personnel. The division also arranges educa-

³ Sida's Environmental Management System: Policy and Action Plan for Environmentally Sustainable Development: April 2004, p. 8.

tional seminars and training sessions in how to comply with the policy implementation strategy and produces different kinds of position papers to support the policy implementation. However, the division does not have any responsibility for the *implementation* of the policy in the organization or in Sida's contributions. Nor does the division have any responsibility to follow up how the policy is implemented or how the organization complies with the policy implementation regulation. The division seldom supports single POs and does not involve in integration of environmental issues in particular contributions, as they work solely on an overall level.

The division publishes an annual report on how the activities have been implemented. Thus, the focus is more on the activities of the organization, like seminars, trainings and conferences and policy development than how the environmental mainstreaming proceeds.

Sida staff is directly responsible for producing an environmental analysis for country and regional analyses. Later the Ministry of Foreign Affairs decides whether to include the analysis in the final country or regional strategy document.

For a single contribution the responsibility for carrying out the EIA lies with the (local) partner. Sida staff later makes an assessment of the delivered EIA and includes a summary of the review in the preparation documentation. Within Sida's organization, the responsibility to ensure that environmental issues are mainstreamed into the project, i.e., that an EIA is completed, lies with the PO responsible for the contribution. The PO must clearly inform the local partner of the EIA requirements.

2.4 Policy Implementation Strategy

The principal policy implementation strategy is to integrate environmental issues in all contributions. An important feature, as stated already in the policy, is to perform an EIA for all contributions supported by Sida. This is more precisely described in the "Guidelines for review of environmental impact assessments", a document with much focus on EIA and apprehended as one of the central documents for definition of the policy implementation strategy. This document contains checklists for review of EIAs with a high level of detail and many specific requirements. It is stated that "in exceptional cases of contributions that are considered to have very little environmental impact, Sida's POs may be responsible for an EIA in the form of a brief appraisal in the assessment memoranda or other documents used in this decision making process".

For projects with a potential significant environmental impact, a two-step analysis should be performed, first a review based on a set of general questions and secondly a specific area review, which is based on the specific type of project in question.

2.5 Policy Implementation Support

Sida make various kinds of support available for the PO in their work to comply with the policy implementing regulation. The implementation support consists of five main items presented in the list below. Other documents exist but they all deal with environmental integration on such a high and general level that they cannot be considered implementation support.

- 1. The "Guidelines for review of environmental impact assessments".
- 2. Specialist support in form of two help-desks, one for EIA and one for SEA (and specialist support from Swedbio, RRD and SENSA).
- 3. Sida's environmental management system.
- Expertise at Sida's department NATUR, department for natural resources and the environment.
- 5. The focal point person at the delegated embassies.

2.5.1 Guidelines for review of environmental impact assessments

The guidelines "Sustainable Development? – Guidelines for review of environmental impact assessments" include a collection of checklists, consisting of a basic general questionnaire valid for all sectors, which is followed by sector specific questionnaires for the following sectors:

Table 2-1. Presentation of checklists included in the "Guidelines for review of EIAs"

Natural resources	Infrastructure and Industry	Service sectors	Institutional development
Agriculture and Forestry	Dams	Trade and Commerce	Education
Water related activities	Energy	Tourism	Institutional development & Capacity building
Coastal zone related activities	Transport and Communications	Health and Medical care	Research
Waste management	Building and Construction works	Humanitarian assistance	
	Quarrying and Underground mining		
	Industry		

All the questionnaires have a high coverage of direct and indirect impacts and bring a high level of detail. The information sought after is considerable and includes local as well as global factors, economical considerations and aspects on how different societal groups can be affected.

2.5.2 Specialist support

Sida provides specialist support for implementation of the environmental policy through three different functions: the SEA and EIA helpdesks, local support at each delegated embassy in the form of the focal point function and a number of personal contacts at NATUR at the HQ. The Environmental Policy Division assists the POs with policy documents such as the "Guidelines for the review of environmental impact assessments" and with supporting position papers.

2.5.3 Helpdesks

There are two Sida helpdesks, one SEA Helpdesk (Strategic Environmental Assessment) helpdesk at the University of Gothenburg and one EIA (Environmental Impact Assessment) helpdesk at the Swedish EIA Center at the Swedish University of Agricultural Sciences in Ultuna. Both helpdesks are external and contracted by Sida to assist on a case by case basis. They assist POs inside and outside Sweden and are also involved in the development of the implementation strategies and support tools.

SEA Helpdesk at Gothenburg University

The SEA Helpdesk's main functions are:

- To provide Sida with Strategic Environmental Assessments in the Country Strategy processes.
- To give general advice on key policy documents being developed by Sida.
- To follow the international development within the field of SEA, sustainability indicators and other areas aiming to incorporate best practice into Sida operations.
- Capacity building in SEA

EIA Helpdesk

The Sida EIA Helpdesk at the Swedish EIA Center at the Swedish University of Agricultural Sciences in Ultuna supports Sida with EIA matters.

The EIA Helpdesk has the following main assignments:

- To be a resource for review of EIA's in contributions.
- To review all contributions submitted to the Project Committee, i.e. contributions with a budget above 50 MSEK.
- To give advice directly through phone or mail.
- To constitute a second opinion in EIA matters

- To develop the know-how in the area.
- To give education in EIA.
- To participate in the development of EIA documentation
- To review partner laws and regulations regarding EIA
- Capacity building in EIA

2.5.4 The focal point function

All delegated embassies have appointed a focal point person for each of the mainstreaming issues, i.e. one for gender equality, and one for environment, for example. As discussed in the following pages, the implementation of the function varies considerably dependent on the embassy. All embassies have different opinions on how to define the role of the focal point person and about what areas to mainstream. However, generally, the focal point person has the responsibility to guarantee that his/her mainstreaming area is considered correctly during the contribution preparation and to assist other POs with integration/mainstreaming of their subject. Further responsibilities are to gather available information and to disseminate important issues regarding mainstreaming from the HQ to the rest of the embassy POs.

2.5.5 Expertise at Sida NATUR

Sida NATUR at the HQ in Stockholm has persons that can assist POs at the various embassies and at the HQ with mainstreaming issues. The specialists are given responsibility for various types of issues (for example forestry or water management) rather than geographical areas.

2.6 Follow-up

Follow-up of Sida's general environmental performance is effectuated within the framework of the environmental policy division's ordinary follow-up of environmental activities within the EMS, presented in the annual "Sida's Environmental Report".

Environmental aspects and protection measures in general in the projects and programs are to be followed-up through UTV (Sida's Department for Evaluation and Internal Audit). Evaluations on selected items are handled through ordinary project evaluations at the department level. The findings are reported in public reports. There is no specific system for regular follow-up of environmental integration or compliance with the policy implementation regulation.

3 Environmental Integration at Sida – in Practice

The major focus of this evaluation is to assess the environmental integration in the field where the resources are being used. A major part of Sida's resources are still being spent on mainly Sida-financed contributions administrated at the field offices. However, following new policies, increasingly larger parts are being directed to contributions managed in cooperation with other donors, to program support, and as budget support. This evaluation has covered all forms of assistance but with a stronger focus on Sida's own contributions.

The findings from the field visits conducted for this evaluation are presented in a summarized form below. More details are given in the Appendix 10 "The Field Perspective".

3.1 Own Contributions

Strong components in Sida's work with environmental integration

In contributions with potentially direct environmental impact Sida's organization largely complies with the environmental policy regulation.

Weak components in Sida's work with environmental integration

- In contributions with only indirect environmental impact or no/small environmental impact, which constitute a majority of the contributions, Sida's organization does not manage to comply with the intentions of the environmental policy.
- In general, environmental issues are not integrated but rather incorporated as a separate issue in some contributions.
- The environmental analysis is focused on verifying that the contribution does not bring about any negative environmental impacts. The practice could be defined as a "No harm"-approach. The wider context of environmental integration as described in Sida's documents is not understood by their own organization and not by contribution owners and representatives for the cooperation countries. Possibilities to achieve positive environmental effects of development activities are mostly missed out.

 There are no indicators that allow for follow-up of effects of the environmental policy in sector- or budget support.

3.1.1 Project Documentation

Field study

In total, the review of project documents at the visited embassies included 89 contributions. For each contribution it was reviewed how the integration of environmental issues was accomplished. A summary of all the reviewed contribution folders shows that:

- In contributions with a high potential of direct environmental impact, environmental analyses are present and well performed. This concerns mainly contributions related to the energy sector.
- In contributions with a high potential of indirect environmental impact there is mostly no correct environmental analysis present. The environmental issues are mostly, in the contributions reviewed, dispatched with a short statement declaring that the contribution does not have any environmental impact. For example, environmental considerations were found to be absent in large contributions in private sector development and industrial and tourism development. In all these cases, a potential for negative indirect impact existed.
- In contributions where environmental considerations constitute a potential for improved performance, for example in the education sector, treatment is inadequate in the contributions reviewed. Environmental issues are dispatched as described above and possibilities such as the introduction of environmental considerations in curricula at different levels have been overlooked.
- In contributions with no direct or indirect environmental impact and no obvious potential to include environmental issues in a natural way, there is sometimes no indication of environmental mainstreaming, or only the ubiquitous statement declaring that the contribution does not have any environmental impact.

Field Quotations:

"In assessment memos it is often stated that there are no motives for making an EIA. That assessment I make myself based on my own experience."

"Environmental issues are more important in some sectors than in others. They have their position in programs for land management and district development, but also for energy, where it has been relatively easy to include them."

Project Committee Projects

The EIA Helpdesk always evaluates the EIA for all contributions sent to the Project Committee, i.e. contributions with a budget of 50 MSEK or more. In 2005, the EIA Helpdesk received about 25 such contribution proposals. It should be noted that about 10 out of the 25 submitted proposals did not include any form of EIA documentation.

3.1.2 "No Harm" approach

All interviewed POs understand that Sida must not get involved in contributions that may cause serious environmental degradation and up to that point the implementation of the policy is successful. However, the approach to focus on verifying that the contribution does not bring about any negative environmental impacts, a practice that could be defined as a "No Harm"-approach, tends to be used also when administrating contributions without a direct impact on the environment. The analyses focus on identification of potential risks for environmental degradation in situations where no considerable degradation potential is to be found and the result will be the all too commonly used statement "The contribution has no environmental impact". This focus on negative physical effects can for many projects lead to misleading priorities. For example, small scale environmental effects like "extra commuter traffic", "garbage thrown away from offices" or similar issues that are normal results of economic development and not specifically attached to the project can be brought up in the EIA. Major possibilities to work with increased environmental awareness or introduction of environmental issues in line with the UN statement that "clean environment is a human right" can on the other hand be omitted.

Field Quotations:

"You ought to ask yourself the question if the analysis you are about to make will influence the final decision. In general you should not overdo things that will not contribute to the result. There is a lot of writing at Sida."

The "No Harm" view, focusing exclusively on physical negative impacts, leads to that environment is handled as a separate subject and not as a main-streaming issue. It limits the understanding of the environmental policy and leads to indirect impacts or possibilities to include activities or aspects that have a positive environmental impact being overlooked.

3.1.3 Environment in contribution evaluations

Sida has previously carried out two evaluations on environmental considerations in Sida evaluations of contributions, e.g. projects, programs etc. Both studies, effectuated in 1996 and 2002 respectively, found that environmental considerations were included in only 20–30% of the evaluations. Only a small improvement had been achieved during the six years that passed between the evaluations. More on these studies can be found in Section 1.5.

In this study, a follow up of evaluations of contributions was made to understand whether the trend had changed or not. Evaluations from 2005 were reviewed in search for how environmental aspects a) were included in the Terms of Reference for the evaluation assignment and b) reported in the evaluations themselves. Altogether 26 out of 34 reports were studied, the remaining 8 reports were written in other languages than Swedish or English. Environmental mainstreaming was found to be a less relevant topic in three of the reports, which were excluded in the summary. The results are summarized in the table below. A detailed list is shown in Appendix 3.

Table 3–1. Summary of environmental considerations in Sida's contribution evaluations. Comparison with gender equality considerations.

Total Environmental number of considerations in evaluation the TOR reports		Environmental considerations in the Evaluation Report		Gender considerations in Evaluation Report		
26	6 (2 N/A)	25%	9	35%	18	69%

The Department for Evaluation and Internal Audit reports annually to Sida's Board of Directors on the progress of its own evaluation activities and the evaluations undertaken by other Sida departments and the Swedish embassies in the field of development co-operation. (Annual Report of Sida Evaluation Activities, 2005.) The report includes presentation of activities carried out and short citations from the evaluations. Deviations from policies, relevant observations and suggested recommendations are not highlighted.

The results show that there has been no major improvement on environmental considerations in the reports since the last two evaluations in 1996 and 2002. The lack of improvement indicates that Sida's management have not acted sufficiently on suggestions for improvements and thus it seems that they do not work sufficiently with implementation of the environmental policy.

3.2 Support through other Donors and NGOs

Weak components in Sida's work with environmental integration

For support that passes through other donors and NGOs, Sida has not managed to ensure compliance with its environmental policy.

3.2.1 Swedish NGOs

All the representatives from Swedish NGOs interviewed voiced that they have considerable freedom to set up their own policies without paying too much concern to Sida's policies, although Sida is their main source of funds. Their own policies do differ considerably from Sida's, especially in matters of environmental mainstreaming.

Responsible NGO personnel claimed that policy issues such as mainstreaming rarely is a topic brought up during otherwise frequent discussions with Sida. The awareness of Sida's environmental policy and its implications was found to be low, and they did not normally search for information among Sida's published documents.

The NGOs work near the contributions and have adopted their views and opinions to the reality in which they work. Thus, their opinions on main-streaming lie close to those of the cooperation country, i.e. they do not see the benefits of ever present environmental analyses in contributions and activities without direct environmental impact. They also indicated that it is most difficult to get the contribution owner's positive response to analyses, like mainstreaming, that lie outside the main objectives.

3.2.2. Other donors

In larger contributions supported by a group of international donors, i.e. basket funding, normally one donor has a lead function and sets the priorities of the contribution. Other donors do not, as ÅF discovered, stress environmental integration to the same degree (i.e. as much) as Sida does but limit themselves to a "No Harm"-view of the contributions. Thus, when Sida supports larger contributions as one of a group, it is difficult for Sida to gain a hearing among the other donors for implementation of their more extensive policy, comprising integration of environmental issues.

3.3 Program and Budget Support

For support that goes through programs or budget support, Sida has not managed to ensure compliance with its environmental policy.

Program- and budget support are relatively new ways of managing contributions, and there is uncertainty and reorientation regarding how to introduce and defend Swedish values in the design of such contributions. Different opinions have been expressed during the interviews, some state that it will be difficult to implement Sida's holistic views while others believe that this is a positive development and that it is necessary to involve the partner country at a central political level and through its institutions to gain results.

Field Quotations:

"Budget or basket support leads to a harmonization process between donor countries, you have to agree on which issues that are important. In most cases, environment does not belong to them, except for in forestry, water management and mining."

Currently, it can be noted that there are no indicators that allow for follow-up of effects of the environmental policy in program- or budget support. Sida administrators involved in program- and budget support mention that environmental policy issues rarely are brought up during negotiations and discussions as there are other values and policies that are considered as more essential and the room for bringing up details is limited. It can be concluded that Sida currently does not stress the importance of environmental main-streaming in these forms of contribution.

Field Quotations:

"Before, every donor came to the discussion with his favourite aspects. It could add up to 80 different indicators, which was untenable. Today, the Performance Assessment Framework has been reduced from 30 to 6 pages. It follows the logical structure of the Poverty Reduction Strategy, and follow-up is linked to national processes for evaluation. You rather strengthen the internal processes of the partner country than create parallel systems."

3.4 Environmental Integration in Country Analysis and Country Strategies

Environmental considerations in recent Country Analysis and present and former Country Strategies were evaluated. The results are presented more in detail in Appendix 7. A summary of the results are given below.

3.4.1 Country Analyses

It was found that an environmental analysis had been carried out in 16 of the 17 studied cases of Country Analysis performed during the last years. Thus, the environmental policy requirement that an Environmental Analysis shall be produced as part of the country strategy preparation process is met.

Environmental considerations in the form of descriptions of the physical environmental situation were found in the country analysis reports. However, only six of the seventeen analyses included comments to the partner country's capacity to handle environmental issues, such as environmental legislation, level of legislation implementation and institutional capacity. This could be an important draw-back, since knowledge about this capacity is necessary when assessing the possibilities for developing environmental integration and performing environmental assessments, such as EIAs and SEAs.

3.4.2 Country Strategies

Both present and former country strategies were reviewed and assessed related to their degree of environmental contents and integration.

The review of 46 current country strategies submitted during the period 2000–2005 clearly indicated that:

- A large number do not underline or even mention that environmental issues should be integrated in all projects.
- There is a positive connection between environment being a prioritized area of cooperation and mentioning of environmental mainstreaming in the country strategy. This connection has been verified through interviews with administrators responsible for developing country strategies: They confirm that an environmental analysis always form part of the country analysis, but when environment is not a cooperation area, the presentation of the environmental analysis may be very thin or even left out in the country strategy.
- A regional difference has been observed with regard to the presence of environmental issues. Country strategies from Asian and European countries showed the highest degree of environmental issues present. African country strategies have fewer environmental considerations. Studied country strategies from Latin America showed the lowest degree of environmental concern. The reasons for these regional differences can not be specified other than the one discussed above, that environment is more an area of cooperation in the regions where environment is better integrated.
- In comparison, integration of gender equality is of higher quality, less
 often omitted and indicated less of a range between responses. HIV/
 AIDS show more of the same pattern as environment, even though less
 clear, with better coverage in countries where HIV/AIDS constitutes an
 acutely serious problem.

Environmental considerations and comments on environmental integration were not present in quite a few country strategies. From the interviews with stakeholders, it has been noted that the country strategy, together with the terms of reference, often are the main sources of information when planning for project implementation and reporting. Thus, comments on cross cutting issues in this type of guiding document are of great value for how environmental considerations are met in projects and programs.

For 13 countries, the country strategies from 1995–1999 have been compared with the corresponding reports from 2000–2005. The comparison indicates that integration of environmental issues in country strategies have improved between the two periods. During 1995–1999, 47% of the reports were acceptable according to our definition, a figure that increased to 63% during the period 2000–2005.

The complete result of the review of country strategies is presented in Appendix 7.

3.5 Differences in Environmental Integration within Sida's Organization

One point in the ToR was to assess if there were any differences between Sida's various departments in relation to the quality of integration of environmental issues. After the initial round of interviews of personnel at Sida HQ in Stockholm it was concluded that no systematic variation could be found between the various departments.

The following visits to the various field offices strengthened this conclusion. There is variation between persons, but not between departments or groups. It should be noted that ÅF assessed integration of environmental issues, not expertise in environmental sciences, as some departments at Sida naturally are much more competent in these areas.

3.6 Change of Environmental Integration Over Time

ÅF attempted to evaluate if there have been any changes during the last 10 years in how Sida integrates environmental issues. The problem with looking 10 years back is that only the documents are available, the interpretation of the texts and the reasoning of the personnel are lost. When looking at only the texts, it is difficult to find major changes during the last decade. ÅF reviewed, for example, all old country strategies available and found that the integration of environment had improved, but the change was not large.

Whether the integration at contribution level has changed has not been possible to find out directly through studies of old project documents, as these proved difficult to locate. However, earlier evaluations suggest that no dramatic changes have occurred.

4 Causes

The deficiencies in compliance with the environmental policy and the lack of integration of environmental issues in all contributions are due to several causes. In this chapter the direct causes to the deficiencies are presented. There is no reasoning and no questioning in this presentation, only easily observed direct causes to why there are deficiencies in the compliance with the environmental policy and a lack of integration of environmental issues in all contributions. Explanations to the observed problems are presented in chapter 5.

Some of the major causes observed are listed below:

- POs are aware of the environmental policy but not familiar with its contents, requirements, or where to find it or how to implement it.
- There are different opinions among POs of which subjects that are to be considered mainstreaming issues. Not all POs consider environment a mainstreaming issue.
- POs have a large number of requirements to fit into the same contribution and at the same time a pressure from the management to minimize the time spent on administration. Prioritizations are being made and integration of mainstreaming issues is not first on the list.
- None of the interviewed local project committees has ever sent back a contribution for review due to inadequate integration of environmental issues.
- Environmental Focal Points do not promote integration of environmental issues actively and do not normally assist the PO with the integration during the preparation of a new contribution.

4.1 Environmental Integration in the Organization

4.1.1 Program Officer

Awareness of environmental integration

A sum-up of all interviews with POs shows they are aware of the environmental policy but not very familiar with its contents, requirements, where to find it or how to implement it. A large majority of the POs have difficulties understanding how the policy's general descriptions can be translated into their contribution. It is a common view among field staff that the necessary tool for implementing the environmental policy is lacking.

Most POs are aware that environment is a mainstreaming issue and thus must be considered during the contribution preparation. However, it was found that the general awareness about which subjects that are to be considered mainstreaming issues vary among the POs. All agree that gender equality is a mainstreaming issue but not all include environment on the list. HIV/AIDS is not included at some embassies, while some embassies include corruption, children's rights, indigenous people's rights and human rights issues. Of the POs that were aware that environment is a mainstreaming issue, very few could define what the mainstreaming actually implied and the demand that an EIA must form part of all Sida's contributions and the detailed requirements that are presented in the document "Guidelines for review of environmental impact assessments" is not embraced. ÅF did not find an explicit listing in any Sida document of what mainstreaming issues there are.

A significant number of POs are not aware of the existence of the "Guidelines for review of environmental impact assessments". Among those who did know about and used the document it was considered to be Sida's main document on how to work with environmental integration. Several POs mentioned various other documents as central and their main source of inspiration and instruction, for example sector policies for private sector development, micro finances and the energy sector etc.

Field Quotations:

"For smaller projects, 3–4 MSEK, it is enough with an assessment, a kind of 'no harm' assessment. It must always be there, it is a requirement. For larger projects or programs there must be a proper EIA, and then you need expertise. The help-desk is a good source of knowledge, it should be kept."

It should be noted that the knowledge about the environmental policy and how to implement it was higher among expatriated Swedish personnel than among locally employees. Also, local personnel do not use the helpdesk as much as expatriates and they are not always even aware of its existence.

Approach

From the interviews it was clear that POs working in the field have a different view of the situation than POs working in Stockholm. In the field they have a practical approach to their work and see the production of contributions as their main target. The interests and priorities of the contribution owner and the cooperation country Government are central to them. They have a deeper understanding of the actual situation in the cooperation country and realize better which type of activities, and to what degree, that successfully could be implemented. Here a large gap between the HQ and the field has been noticed.

Use of support functions

The local support function in the form of the focal point is very seldom contacted before the final assessment of the preparation documents in the local project committee. A common reason for this is a wish not to overload or disturb him or her, as a PO is performing the focal point function outside the normal duties.

The two Helpdesks in Sweden play an insignificant role for many of the POs, especially for the locally employed. The majority of the POs have never contacted the helpdesks. They do not see any reasons for involving them and have the understanding that contacting them only would delay the preparation process. Among the POs with experience of working with the helpdesks some are most happy with the support they have received, mainly POs administrating contributions with a large potential environmental impact. Others, mainly POs administrating contributions with small or minimal direct environmental impact, have the opinion that the reply from the Helpdesk, mostly in the form of a list with a number of issues to be considered, only makes the administration more complicated.

Field Quotations:

One locally employed PO said that she did not have much use of support such as helpdesks. "I want more help with mainstreaming so that I know how to do it by myself. The helpdesks makes it more complicated rather than solving problems and brings up issues that do not belong here in this country."

A Simple Fact

The use of the EIA Helpdesk is not extensive. During 2005 POs at Sida HQ and in the field submitted approximately 50 contributions to the EIA-helpdesk for review. (Sida has almost 6,000 assignments ongoing annually.)

Opinions about environmental mainstreaming

A large majority of the POs felt that mainstreaming in general is difficult and believe that the issues could be treated better. Many POs mentioned that it is difficult for them to handle environmental issues due to their lack of relevant education. ÅF noted during the discussions that most POs have difficulties to regard the environmental policy as anything other than a rule to be applied to avoid environmentally harmful contributions. Thus, when a contribution obviously is not harmful, further analyses are put aside.

POs voiced that the required scope of the EIA and the number of indicators required are too extensive. They feel that the EIA regulation needs to be better adapted to what is really of importance for the country or situation in

question. The regulation should consider that practices are different and that reliable data may prove scarce. It is difficult to promote Swedish environmental requirements in cooperation countries if they are not considered locally relevant.

4.1.2 Local Project Committee

According to the interviewed POs, the local project committee has the responsibility for the quality of mainstreaming and most POs seemingly await the presentation of the contribution and the following discussions in the committee before they put an effort into mainstreaming.

However, according to the interviewed committee members, none of the visited local project committees ever sent a contribution back for revision due to inadequate integration of environmental issues. Sometimes it has been remarked during the presentation that further analysis is needed, but it has never been followed up that required improvements have been implemented.

At one of the visited embassies there was no mentioning whatsoever about environmental mainstreaming or considerations in the task description for the local project committee.

These observations do not regard the quality of the integration of environmental issues, only that the local project committee does not seem to be prioritizing environmental mainstreaming and is not used in a way that would guarantee a good quality of the integration.

4.1.3 Focal Point

It was noted that the focal point job descriptions vary considerably. Some focal points view it as their task to push their mainstreaming issue and thus organize seminars and seek to assist and discuss the issues with other POs. Others act as a link to other focal points at other embassies, exchanging experiences and knowledge regionally and internationally. Still others limit their role to passing on documentation from the HQ and posing the obligatory questions regarding their mainstreaming issue during local project committee presentations.

The status of the focal point person was sometimes not obvious. At one of the embassies, the group of POs considered a colleague to be the environmental focal point, but that person was unaware of these duties. The environmental focal points did not necessarily have a background in natural sciences and they had not received any special education related to their position from Sida, facts that made it as difficult for them as for any other PO, to grasp the complexity of environmental integration. Environmental focal points had in common, a view that the role of the focal point was not seen as central by the local management. Environmental focal points did not use the helpdesks and the "Guidelines for review of environmental impact assessments" to a larger extent than any POs.

5 Explanations

Apart from the observation of the present status of environmental mainstreaming, presented in Chapter 3 "Environmental Integration at Sida", and the apparent reasons for the deviation from policy and regulation, presented in chapter 4 "Causes", ÅF has deduced a number of explanations. The explanations cover important conditions for implementation of the environmental policy, in the form of circumstances in Sida's organization, the functioning of Sida's steering documents, and the implications of the situation outside of Sida's organization. The discussion is based on the interviews with Sida staff and stakeholders and the project team's own experiences.

5.1 Major Explanations and Underlying Causes

The principal explanations are summarized in the list below.

- Sida has created an overall environmental policy but has not broken it down into targets possible to apply on the contribution level. The concrete journey towards the stipulated goal is not defined. POs in general do not understand how to apply the environmental policy.
- The managers, at the HQ and locally at the delegated embassies, do not prioritize and promote integration of mainstreaming issues.
- Sida is not a learning organization when it comes to integration of environmental issues. Experiences gained during one contribution preparation process cannot be used by another PO preparing a similar contribution. There is no networking, no mainstreaming seminars, nor are there workshops arranged to share and compile best practices and good examples.
- There is no regular follow-up of integration of environmental issues at the delegated embassies, nor of policy implementation, nor of compliance with the EIA-regulation and not of environmental concerns in the contributions.
- The follow-up of integration of mainstreaming issues, at HQ and field offices, is irregular and almost non-existent, a fact that naturally inflicts severely on the quality of the mainstreaming of environmental issues.
- Sida is promoting implementation of EIA heavily and has an ambitious EIA regulation, a combination that in practice counteracts integration of environmental issues as it leads to focus on negative physical impact and makes many POs understand that the environmental policy consists only of EIA.

5.2 The Implementation Chain

The Environmental Policy is formulated at Sida's HQ, as is its implementation strategy. The implementation of the policy largely takes place in the field. It has become obvious during the evaluation that there is a considerable gap between the ideas and intensions of the policy and its effects in Stockholm, and the capacity to implement it in the field. The field personnel do not understand how to implement the policy, the targets are not possible to grasp and the concrete journey from policy to implementation does not exist. It is difficult for POs in general to see how the policy can be applied in a specific contribution. There is a lack of tools and guidelines that can translate non-specific general and global ideas into definite applications adopted to the local situation and reality. The various assistance mechanisms that do exist; guidelines, helpdesks and other documents, are either not specific enough to be of help (other documents) or not adapted to the local reality and too focused on EIA (guidelines and helpdesks).

The conclusion is that Sida has tried to introduce an extensive and complex system for integration of environmental issues without working sufficiently with the means and methods for its implementation.

5.3 Organization

5.3.1 Prioritization

A majority of the POs mentioned during the interviews that they do not feel that Sida promotes environmental integration especially. There are no signals from central or local management, other than the flow of documents, that integration of environment is a central issue for Sida. The management seems to be more focused on the economical turnaround and there is no stimulation to do careful work on mainstreaming issues. There is no local follow-up or any local discussions, workshops, seminars or trainings on how to approach integration of mainstreaming issues.

Field Quotations:

"Environmental issues have not been brought up at the embassy since I came here. Environment has not been highlighted within other sectors than the environmental sector itself."

At the central level, neither the Environmental Policy Division nor any other Sida department has the responsibility to coordinate the implementation of the policy and integration work through the EMS.

The local managements have the opinion that it is a very demanding task that the HQ prescribes when it comes to mainstreaming. None of the contacted managers have worked especially with promotion of environmental integration. It should be noted that none of the interviewed managers presented the same job description for the focal point, a central function for integration issues.

Most POs find themselves in a situation full of requirements where the time set aside for administration of contributions is limited. In this situation there is a general opinion that the environmental policy is too ambitious and too demanding to comply with. To cope with the many requirements in the form of policies and regulations, the POs need organizational support in the form of clear prioritization rules and definition of realistic targets for the operation. However, according to the interviewed POs, these do not exist. There is no advice on how to prioritize and work simultaneously with several requiring mainstreaming issues and sector requirements.

Field Quotations:

"I would like a comprehensive but more limited checklist for the sector comprising all cross-cutting issues. It could be divided into mandatory demands and recommendations. The guidelines today are so disparate and too numerous, coming from many different directions as there have been more and more cross-cutting issues."

To comply with all of Sida's mainstreaming policies considerable resources must be set aside in the form of PO time. Sida's management at HQ and local levels have to consider the balance between the ambitious level of policies and rules and the costs and time to be spent in the organization for mainstreaming. Encouragement from the central level that efforts are put on integration of mainstreaming issues must be followed at the local level. Presently POs feel that the quantitative target is given a considerably higher prioritization than the qualitative goal in form of compliance with policies.

The low support from management to work with environmental integration naturally impacts severely on the overall quality of the integration. POs make their prioritizations based on the signals from the management. The management must show that it considers integration to be of equal importance as it is given in the documentation if a successful implementation is to come to fruition.

Coordination of mainstreaming issues

An issue closely correlated with the prioritization is the current lack of coordination of integration of mainstreaming issues. The policy implementing strategies for the various mainstreaming issues are developed at different departments at the HQ without, as it seems, horizontal correlation and communication with other departments.

Field Quotations:

"There are many policies at Sida, and when a new one arrives, you joke a little about it. Many persons, who work with a specific issue, seem to want to make what they do into a policy, it gives status."

ÅF found at least 25 policies that need to be considered but the recently published evaluation of mainstreaming of HIV/AIDS issues states the existence of 72 policies, all to be considered. All these requirements seem to arrive in separate channels to the PO's desk and the feeling among POs is that all issues claim to be of maximum importance. Prioritization between them is not allowed, formally none of them can be considered less important and treated less carefully, but the limited time available for administrating a new contribution makes prioritization necessary. As there are no formal rules and regulations for how to handle the prioritization each PO will have to make up a personal set of priorities, leading to a situation where similar issues are considered differently within Sida.

Field Ouotations:

A PO exemplifies the need for better mainstreaming models with some kind of classification in positive-, negative- or no direct/indirect environmental effects. Especially the indirect effects are difficult to grasp. The PO would like to see instruments where you harmonize all the cross-cutting issues together and thinks that the starting point must be more of a general attitude to improve living conditions for the people. "There are too many focuses today, it is difficult to get it together."

5.3.2 Learning Organization

Sida is not a learning organization when it comes to integration of environmental issues. Experiences gained during one contribution preparation process cannot be used by another PO preparing a similar contribution. Each time a PO starts integrating environmental issues in a new contribution he is limited to his personal earlier experiences as support. Rarely experiences

from other POs in the same embassy are used and never, according to our interviews, experiences from other countries. There is no networking, no mainstreaming seminars, nor are there workshops arranged to share and compile best practices and good examples.

5.3.3. Communication

A conclusion from the field visits was that the communication between the HQ and the embassies, especially the delegated ones, must be improved. Presently the main communication strategy, as perceived by the field, consists of documents sent out from the HQ through email. This is a one-way communication and the field does not feel that there is limited possibility to receive explanations, interpretations or implementation advice from the HQ on policies and regulations. In two of the visited embassies, the managers had explicitly asked the HQ to provide assistance in how to work with the environmental policy but the HQ could not meet the petition.

5.3.4 Follow-up

The follow-up of integration of mainstreaming issues is irregular and almost non-existent, a fact that naturally inflicts severely on the quality of the mainstreaming of environmental issues. Currently it is largely up to the individual PO to assess the quality of the work.

Integration of mainstreaming issues must be followed-up quantitatively as well as for quality, and not only within the organization but also later in ongoing contributions. The follow-up constitutes an important part of the learning organization process.

5.3.5 Environmental Management System

The Swedish Environmental Protection Agency (SEPA, i.e. Naturvårdsverket) has presented a Swedish model of an EMS for governmental agencies, including the following main components:

- Policy
- Objective and Targets
- Activities
- Implementation
- Follow up
- Review, Evaluation and Improvements

The system should be working along a never ending circle aiming at continuous improvement. Sida's EMS differs considerably from this model, as illustrated in the figure below. Items marked in bold are included in a complete

EMS but missing in Sida's version. Sida has defined objectives but no targets for the environmental work and no priorities for activities to be taken are defined. This is a major deviation from the EMS practice.

Sida's Environmental Management System



To secure continuous improvement in an EMS, objectives should be defined and further developed into targets and activities in such a way that it will be possible to monitor the outcome of the implementation. The result should be evaluated, corrective measures taken and the management should review the policy.

In contradiction to these standard procedures Sida states in the 2004 Environmental Report that it often is not possible, or even meaningful, to make a reasonable estimation of the degree of fulfilment of the environmental contributions.

The EMS document, dated April 2004, indicates that the selection of activities is rather ad hoc. It seems that each department has proposed a number of activities without coordination.

When Sida reports the results of the work with the EMS, as expressed in the 2004 Environmental Report, it is in the form of a description of various internal activities that have been carried out. Almost no information is given of the results of the efforts carried out in the partner countries.

A Simple Fact

Of the results from about 6,000 contribution activities only one is mentioned in the 2004 Environmental Report, namely: "Certification of 1,5 million ha forest in Bolivia".

The fact that several major components are missing in Sida's EMS impairs the functionality of the system, Sida does not use its Environmental Management System for implementation of the environmental policy in an efficient way.

5.4 Policies and other Steering Documents

It is vital that policies and other steering documents clearly show the necessity of integrating environmental issues into Sida's activities and that they demonstrate how to effectuate the integration. To evaluate how this correspond with reality a large number of policy documents were reviewed during the course of the project (Appendix 4 and Appendix 5). The focus of the review varied as the documents have different functions and they were divided into five categories:

- 1) Comprehensive policy documents with principal contents, in Sida's vocabulary called "Sida's fundamental principles and values".
- 2) Environmental policy documents, guidelines and other steering documents treating environmental issues, such as water resource management, climate change and green procurement.
- 3) Policies and other steering documents indicating methods for development cooperation, such as guidelines for development of country strategies and *Sida at Work*.
- 4) Sector policies and other steering documents regarding sectors and other elements of development cooperation.
- Policies for gender equality and HIV/AIDS, two other cross-cutting issues, where comparisons, experiences and ideas could be garnered about mainstreaming and evaluation methodology.

The results of the review dealing with method and sector documents are summarized in this chapter. A list of the reviewed documents is presented in Appendix 4 and comments on environmental integration on selected documents are found more in detail in Appendix 5. In Appendix 6 a list of relevant literature reviewed is presented. The policies for gender equality and HIV/AIDS are discussed, together with respective evaluations of these mainstreaming issues, in Chapter 6.12.

It appears that there are two main reasons why Sida's documents do not give the best support for implementation of environmental mainstreaming:

- 1. The documents are not found by POs and partners, who are responsible for initiating and effectuating the integration.
- 2. The contents of documents are not fully understood by, or are of limited use to, POs and partners, who are responsible for initiating and effectuating the integration.

5.4.1 The document system

The project team found that Sida's policy documents and guidelines in general are well written and contain large amounts of essential, relevant and reliable information.

As a starting point, it was assumed that Sida's policies were organized in a hierarchical way and that the relation between the various documents would be clear. But it was found at an early stage that Sida's policy documents were not easily arranged into a logical hierarchical order and it was often difficult to distinguish their role, correlation and interdependence. The picture was somewhat clarified as Sida remodelled its website in late November 2005 and reorganized the documents into five categories: 1) Sweden's policy on global development, 2) Sida's fundamental principles and values, 3) Overarching policies for the development cooperation process, 4) Thematic and specific sector policies, and 5) Position papers.

However, the actuality of a document can still be doubted, as it is often difficult to see whether a more recent document replaces an earlier version or is to be considered a complement. It was noted that a recent policy document was stated to be valid for 5 years, which is unusual for quality documents that should be continuously updated depending on new legislation or changed priorities.

Unlike in many other organizations, Sida's system of documentation consists of reports from different sources rather than a coordinated and classified system of policies, instructions and routines. It makes revision and additions less flexible.

Several policy documents are not typical policies but a mix of problem descriptions. They consist of regulations and general guidelines and may sometimes also include practical examples. The format is extensive and it can be difficult to see the proper policy through the amounts of background texts, which do not really belong to the policy. It is sometimes difficult to understand the status of a steering document, if it is to be considered a policy document or something else, such as a general presentation of a problem. The forewords and introductions sometimes give another impression than the contents. Also, it may be difficult to distinguish between mandatory and recommended actions. The evaluation of Sida's integration of HIV/AIDS made similar observations and found for example that the HIV/AIDS policy is too descriptive and full of narrative and that enclosed strategies and guiding principles are difficult to follow.

Field Quotations:

"I think that policy documents are too extensive. You only have a limited number of hours for each preparation."

5.4.2 Applicability of documents

General policy documents and guidelines

Comprehensive policy documents regarding international cooperation, from the Swedish Government and from Sida, emphasize that the environmental component of sustainable development, including environmental protection and resource management shall be included. All these statements have a rather general character and could be summarized as saying that cross-cutting issues always should be considered.

Some of the documents also demonstrate connections and synergies between environmental considerations and the abatement of poverty. With the new national policy of global development, this becomes increasingly important for the integration as poverty abatement is the overarching goal of all cooperation.

Environmental policy documents, guidelines

A general observation regarding Sida's policies and guidelines for integration of environmental aspects in cooperation work is that they reflect very high political ambitions.

They demonstrate clearly the aim to convince and motivate environmental concerns in all kinds of contributions. This corresponds to Sida's well-known tradition of consensus-building in management.

However, little support is given for prioritizing, both among different environmental aspects and between environment and other considerations. Successful work of environmental management has often proven to be a continuous development, where the most important environmental issues receive priority and focus in implementation. The very high level of ambition requires much more environmental know-how than Sida's officers in general possess.

In a certain contrast to this are the considerably more pragmatic approaches in the "Guidelines for strategic environmental and sustainable analysis in the country strategies".

Field Ouotations:

"I do not look at Sida's environmental policy but use the sector policy about rural development to see which the environmental aspects might be."

The most important document found, treating how to include environmental concerns, is Sida's Environmental Management System with the subtitle "Policy

and action plan for environmentally sustainable development" (2004). It has been briefly described in Chapter 2, and its function is also commented with Sida's EMS in Chapter 5.3.5. One of its main implications, besides the general commitment to integrate environment into all Sida's activities, is the requirement to use environmental assessment as a principal working method.

This is further specified in Sustainable development? – Guidelines for the review of environmental impact assessments" (2002). Its ambition, to provide staff with complete lists of environmental aspects regarding all areas/sectors of contribution, makes it difficult to see what parameters to chose and how to handle them and may lead to very extensive analyses of a number of parameters, information which may be difficult to find in many partner countries. It is not difficult to imagine how the detailed and scientific checklists and high demands could appear confusing and difficult for POs. The application of these guidelines, which are very central for the implementation of environmental integration, is further discussed in section 5.5.1.

Somewhat different is the approach in The Country Strategies - Guidelines for strategic environmental and sustainability analysis (2002), which describes the development process and the elements of the country strategy. The document has a more pronounced development approach and integrates environmental issues by including environmental aspects and indicators to apply in sector specific problems. The questions given as examples should be easily understood and applied in the contribution context and are linked to indicators. Rather similar is the appearance of Sector Programs – Guidelines for the Dialogue on Strategic Environmental Assessment (2002), which is connected to Sida's Policy for Sector Program Support. Both these documents recognize that environmental assessment at this level will need a process with participation of the partner country, with focus on objectives and strategies based on national policies. Assessment as well as development of routines and conditions for environmental monitoring and evaluation will have to be coordinated with other donors. Guidance, including checklists and questions, is given, both at the general level and for some specific sectors. Reference is made occasionally to Sida's guidelines for EIA in projects. However, this approach includes prioritization and gives more emphasis to positive correlations between environment and development than the EIA guidelines.

Integrating the environment (2004) is another presentation and argumentation for the importance of including environmental concerns, which does not give very much resolute advice and guidance on practical environmental integration. It was not mentioned in the interviews, PO's do not appear to be familiar with it.

Policies and other steering documents on methods for development cooperation

Policies and handbooks for general processes of Sida's work with contributions and international development cooperation are important for integration of environment in daily activities. These documents show great variation as to how they support the PO in managing integration of environmental concerns.

The guidelines for SEA in country strategies, "Guidelines for country strategies in development cooperation" (2001), has a development cooperation perspective also in environmental issues. By including environmental questions to ask, aspects to look for and indicators to monitor and follow in sector documents and their context of sector specific problems, environmental issues would be introduced in a more natural way. Also in the document *Poverty Reduction Strategies*, (2005), describing how to use the Poverty Reduction Strategy of partner countries as a starting point for shaping of the cooperation, has a set of questions in an Annex, but here, environment is less of a focus.

Several other guidelines refer to the use of EIA as the method for integration, if environment is mentioned at all. The PO's "Bible", "Sida at Work" (latest revision in 2005), is a manual on contribution management to guide the various stages of development cooperation. It is often mentioned by POs as the main support for the daily work. Apart from two checkpoints, stating that an EIA must be carried out and that any negative effects must be assessed, there are no specific references to environment or sustainable development; they will have to be addressed like all other goals and criteria in the specific project or program. Thus, the environmental perspective focuses entirely on EIA and assessment of negative impacts (p 31).

The same goes for "Sida's policy for sector program support and provisional guidelines", (2000), which presents the new approach of development cooperation, where several donors together support a sector and its institutional base. Regarding environmental considerations, the only guidance refers to general principles of Sida's policy and to Sida at Work. Sida's guidelines for planning, reporting and audit of projects and programs in Swedish development co-operation hands the issue of integration over to the agenda for the Annual Review Meetings, where cross-cutting issues are supposed to be discussed.

In Sida's policy for civil society, (2004), environment is not mentioned specifically, but it can be assumed that participation of civil society could be of great importance in e.g. EIAs and implementation of environmental actions such as sanitary infrastructure, exploitation of natural resources or protection of nature. A general observation is that the recommendations of the policy to assess the structure, capacity and other characters of civil society are very ambitious and may add to the amount of work of Sida's staff.

To summarize, the main instructive documents for international contribution work give little guidance, if any, to how environment should be integrated. Instead, some refer to EIA, which is not such a suitable tool for the new categories of contributions such as program, basket and budget funding. The exception, the guidelines for SEA of country strategies, will soon have to be replaced as the country strategy process is being remodelled.

Field Quotations:

"In program preparations it is a matter of cooperation with other donors and you can raise an issue only if it is relevant. It is difficult to see the value with an environmental screening in such programs. Instead, you lean on that the receiving country requires permits and will use best practice for starting an activity with potential environmental impact."

Sector policies and similar documents

In documents which show personnel at Sida and other organizations how to effectuate preparations and assessments within different sectors or issues, environment should be present to the extent that it is relevant for the sector. Integration would most probably be more efficient if environment was mixed into it and developed with the strategy documents for each sector. It would also profit from being more development-oriented than problem-oriented. In that way, it would be more evident how to include, how to assess and how to make priorities regarding the environment. A more positive approach could also more easily engage actors outside of Sida.

Field Quotations:

"I use Sida's guidelines, above all for energy projects and then for elaboration of Terms of Reference for the consultants which are to effectuate the EIA. For private sector development I use other policy documents, e.g. those for microfinance."

As expected, integration of environment varies considerably between policy documents and guidelines for other sectors, but the tendency is clear that many of these documents do not include enough environmental concerns. Environment and environmentally sustainable development are sometimes not mentioned at all. When present, environmental issues are often mentioned in very general terms and seldom integrated but treated separately.

Some good examples of integration in sector policies are the policy on "Sustainable Energy Services", (2005), which clearly underlines sustainable energy systems, and "Health is Wealth", (2002), which highlights environment and

other cross-cutting issues within the health sector in a clear and pedagogic way. "Strategic guidelines for Sida support to market-based rural poverty reduction" (2004), recognizes environment as a cross-cutting issue and gives proposals on how to include the theme in rural poverty reduction, such as secure tenure of land, increasing productivity, market incentives for more sustainable and environmentally-friendly production, legislation, and mechanisms for coordination and joint decision-making on natural resource management.

Two examples of sectors with less developed environmental integration are education and economic development.

Education and environmental integration

Education is a very central instrument for increasing environmental awareness and to promote a change towards more sustainable habits, consumption patterns, etc. Motives and methods are described in a short but very informative position paper for Environmental Education from 1999, "Education for Sustainability". However, in the policy from 2001, "Education for All, a Human Right and Basic Need", little can be found of these thoughts and ambitions. Environmental threats are pointed out as a challenge for the education sector and some links are mentioned between environment and education, but environment does not appear among the more instructive chapters including principles for education support. Nothing is said here about learning by discovering the environment, teacher training courses or how to influence curriculum development, training materials or centers of excellence, which are some of the methods and priorities lifted up in the position paper.

Environment is also not present in the other education documents. In "Educational Materials" (2002), a brief view on Sida's policy regarding learning materials and textbooks, environment is only mentioned in a presentation about the Swedish system. In "Adult Basic learning and Education", (2003), there are no references to environment or sustainable development. In "Early Childhood Care and Education", (2005), a short reference paper expressing Sida's views on the subject, environment does not appear.

During the field visits in this project, one of the examples of program support studies was a rather extensive program for educational development. Here, the environmental impacts were included in the program development but first after reminders from Sida in Stockholm. The possibilities of supporting a sustainable development by including environment in curriculum development for example, might otherwise not have been observed.

Economic development and environmental integration

The main policy of this "sector", "Private Sector Development", (2004), provides guidelines and key principles of Sida's support to Private Sector Development (PSD) and guidance for the design and implementation of such sup-

port. It lists environmentally sustainable development among the areas related to an effective PSD, with reference to the UN Global Compact Initiative and the OECD guidelines for multilateral corporations. It is noticeable that this central Sida policy does not refer to Sida's own policy for environment. It does not make it easier for the individual PO to know what exactly is required and what could be done to integrate environment into i.e. market development or to reform trade or financial systems. The policy document informs that special action plans will be produced for its implementation.

In Sida's *Policy on Financial Sector Development* from 1997, environment as mainstreaming issue is only mentioned as one of the subsidiary goals for improving the situation for poor people and to which this policy would contribute. However, although two examples of relations between environment and financial management are given in boxes ("Pungwe-Mutare Water Development Project" and "Green capital venture fund for Central America"), there is no more reference to the theme.

Sida's *Policy for Trade-Related Development, (2005)*, makes no reference to any mainstreaming issue. However, in a list of trade categories from the WTO/OECD database at the end of the document, trade and environment is one. A look at OECD's website shows numerous examples of documents discussing the link between trade and environment. Sida's *Guidelines on Microfinance* from 2004 is a complement to Sida's policy on Private Sector Development. Its purpose is to define and communicate Sida's position on microfinance, to in-house and to external stakeholders. Environment is not mentioned, but the other mainstreaming themes of HIV/AIDS and gender are treated in the guidelines.

Economy, trade and financial systems are in Sida's policies handled very much from their technical aspect as support systems for development and growth and their implications for other goals are almost not treated at all. This may be the intention, still, these policy documents, and adherent guidelines or action plans, would have offered an important opportunity to integrate environmental concerns into the daily work of Sida.

For example, Sida's position paper "Improving Income Among Rural Poor" from 2004, frequently refers to market and economic means for development of the living conditions in the countryside and its interrelations with mainstreaming issues. Market incentives can be created for more sustainable and environmentally-friendly production. Gender equality, empowerment of the rural poor, sustainable use of natural resources and human capability are presented as cross-cutting issues that have to be reflected in the analyses leading to interventions for market development and in the interventions themselves.

5.5 Support Functions

To cope with the many requirements in form of policies and regulations the PO needs distinctive tools. The tools in the form of guidelines or instructions should help to bridge the gap between the policy and the reality and facilitate the implementation. In the following pages special attention is given to existing tools and supports in the form of the "Guidelines for review of environmental impact assessments", the Help-desks and Sida NATUR.

5.5.1 Guidelines

The only direct assistance to POs in the field for implementation of the environmental policy that ÅF has identified is the guidelines "Sustainable Development? – Guidelines for review of environmental impact assessments". The assistance is heavily focused on EIA and direct environmental impact. The guidelines do not give much assistance on environmental integration even though there is an attempt to include a broader perspective less focused on direct physical impact.

Although the guidelines clearly pronounce that application of an EIA is flexible and needs not to be more extensive than the situation requires, it simultaneously states that a short EIA performed by the PO can be accepted in exceptional cases only. For the rest of the cases there is a list with one instruction following the other on what to include and what to consider. The level of ambition in the guidelines is far too high and the requirements of detail far too extensive. The guidelines also have the weakness of being most suitable for contributions concerning investment and operation. POs administrating a contribution within other areas have difficulties in finding support in the document. An important aspect is that the guidelines are not adapted to be used in work with basket funding, program-, sector and budget support.

For infrastructural projects and other projects containing major "physical" components in the form of agricultural or industrial processes, the problem with the guidelines is that the approach is too subject specific. The problem to sort out what is relevant and what is not, is most difficult for a PO without environmental education.

The main strategy for assistance in the guidelines is to put forth questions, that the PO is supposed to pass on to the client/partner. However, often these questions create more problems than they solve as the non-specialist PO can have difficulties in understanding and assessing not only the questions but also any answers coming in. Many non-specialist POs find it difficult to explain and justify the requirements to the client.

The document with checklists is not frequently used by POs in the field, and many are not aware of its existence. It is a common view among field POs that the necessary tools for implementing the environmental policy is lacking.

In this context it is important to note that the "Guidelines for review of environmental impact assessments" cannot be found in Sida's web-based document tree.

Field Quotations:

"I remember that I have seen the document of guidelines for EIA – it was a thick document. I only use Sida at Work."

5.5.2 The SEA- and EIA Helpdesks

The SEA-helpdesk is mainly used for work with the Country Analyses and Country Strategies. For instance, it participated in development of approximately fifteen country strategies in 2004. The SEA Helpdesk also contributed to the development of environmental position papers.

The EIA Helpdesk is available to support all Sida personnel with evaluations of EIAs, to receive comments on proposals without an EIA or to get assistance in drafting Assessment Memos. The POs seldom find themselves competent to evaluate an EIA and there is a need for additional specialist services. Many POs that ÅF has met have been satisfied with the support from the helpdesks. However, there are also many that consider that the EIA helpdesk generates more problems than it solves as it follows the "Guidelines for review of EIA" closely and the therein defined strategy of assisting through asking questions. Instead of answers to their thoughts, the PO receives a bunch of new questions that need to be answered and more issues that need to be considered. Another problem concerns the awareness of the available assistance within the organization, some POs are not aware of the existence of the helpdesks.

Field Quotations:

"The analysis by the EIA help-desk became very much a paper product; they lacked knowledge about local conditions."

However, the main problem with the EIA helpdesk is the strong focus on EIA. Sida and field POs need expert assistance in their daily work with implementation of the environmental policy and integration of environmental issues but the only helpdesk for environmental issues is limited to put an EIA focus on their assistance. ÅF has also seen examples of assistance from the EIA-helpdesk that have lead to "overambitious" results, i.e. EIAs more adapted to Swedish conditions than to the reality in the partner country.

An example from the project committee regarding assistance to a large contribution in the health sector shows that the EIA helpdesk has difficulties to take on an integration approach to environmental issues. The comments only consisted of traditional "impact issues" like construction of buildings.

5.5.3 Expertise at Sida NATUR

ÅF has not been able to evaluate the supporting services given directly by Sida NATUR through interviews, partly depending on a substantial change of personnel just before the evaluation started. Several POs stated that they frequently called on expertise at NATUR for comments on specific questions or that an EIA has been sent to NATUR for comments. In general the POs in the field are content with the services provided. These contacts seem to have more character of personal relations than the contacts with the EIA Helpdesk.

5.5.4 Further information and instructions

The position papers which in many cases are very informative and excellent materials for further information, are seldom read by other personnel than environmental specialists. The reason is likely lack of time and that the non-specialist officers find the contents too specialized.

A large deficit is that sector- and budget support, support to NGOs and basket funding are unfairly treated in the position papers. The issues are touched on only in brief discussions that do not bring to the surface all the problems connected to these forms of contribution.

5.6 Outside Sida

5.6.1 Ambience for mainstreaming in partner countries

 Contribution owners and representatives for the cooperation countries have difficulties in grasping the concept of environmental mainstreaming.

The Swedish policies are widely recognized during evaluation interviews but during actual implementations mostly disregarded. The awareness has not yet reached the point where it is possible to grasp the positive effects of integrating environmental (and other mainstreaming) issues.

5.6.2 Adaptation to the reality in the partner countries

Policy and policy implementation strategy

Sida's policy implementation strategy is to a large degree based on Swedish standards and conditions, leading to problems when implemented in the partner countries where environmental awareness and competence often are low and environmental data is scarce.

EIA regulation

Sida's EIA requirement does not harmonize with national priorities, legislation and does not have institutional support. Also, its extension and the number of indicators required to be considered are too extensive and do not consider the reality in the partner countries sufficiently. The requirements are in reality almost impossible to fulfil due to lack of necessary data and competence. Another issue is that the rather extensive EIA studies may consume more of the resources for environmental monitoring and assessment available in those countries than is reasonable from an environmental point of view.

5.6.3 Program and Budget support

The ongoing changes towards development co-operation based on sector wide support and budget support in accordance with the Paris Declaration along with increased local ownership and donor coordination will change the approach in partner countries as well as within the donor community. The shift in focus from project management towards sector co-operation and budget support will require a change in preparation, monitoring and follow-up.

A frequent comment during the interviews was that the change towards more program-and budget support will require more skills from POs when negotiating from Swedish positions with other donors. The importance to develop a broad network among donors and national institutions and organizations in order to spread knowledge and understanding for Swedish standpoints has also been mentioned.

Within the structure of budget support, debt relief support, payment of balance support, and basket funding, it is in some cases hard to address the Swedish environmental policy in the negotiations with the donor community and maintain that standpoint in the common bilateral agreements. If Sweden is the main contributor it is easier to gain a hearing for Swedish policies, but even in these situations it is necessary to prioritize between the various mainstreaming issues. If Sweden is a minor contributor for a contribution, it could be difficult to claim influence from Swedish policies.

Accordingly the main policies of Swedish development co-operation in general, and the environment policy in particular, come across obstacles to influence and affect areas of co-operation. There are several less important areas but also a number of prominent fields of co-operation where it is quite difficult to gain a hearing for Sida's policies. One of them is Public Financial Management development programs. Other examples are projects and programs related to the rule of law and health systems development.

5.6.4 Environmental issues less trendy

From the interviews, both at the HQ and in the field, it can be stated that environmental issues within Sida are not understood to be important today as they were a couple of years ago. Around the millennium shift Sida had many campaigns on environmental considerations and promoted environmental training; currently the focus is on other issues and the interest in environmental training has declined among Sida staff.

Field Quotations:

"It is not good what we do today, to dispose of environment with one sentence. Out in the field you have to try and find ways of working that means something in reality."

5.6.5 International definition of EIA

Internationally, an EIA is generally only performed for contributions that have a significant potential direct environmental impact, typically infrastructural components or industrial or agricultural processes. Contributions working with management, education or institutional development do not include performance of an EIA. According to Sida the EIA tool should be used for any kind of direct or indirect effects on all sorts of contributions. Sida's interpretation of the concept of environmental impact assessment differs from the international practice. Also, many donors use a screening process to decide if it is necessary to include a complete EIA.

Internationally the typical focus of an EIA is on negative physical impact on the environment. Positive effects are included, but to a considerably smaller extent. Sida not only stresses that positive effects are as important (as negative) but also claims that integration of environmental issues, reflecting the holistic view of the environmental dimension as stated in the environmental policy, should be performed using the EIA concept.

It must be questioned by Sida if the requirement to perform an EIA for all contributions can be understood and accepted by the local project owner and if it is the most efficient way of using limited resources for environmental assessment.

6 Conclusions

The findings and considerations of this evaluation point to a number of factors, which are of importance for successful integration of a mainstreaming issue such as environment. In the following discussion, factors that may be important for integration in general are presented together with the implications from the findings in this evaluation.

To be able to understand more definitely to what extent these factors could contribute to the level of, and results from, mainstreaming, more experience and analysis would be needed from their application in practical situations.

6.1 A Systematic Process of Mainstreaming Implementation

For successful implementation of mainstreaming, a structured approach using common steering mechanisms to drive a general change in behavior and attitudes is needed. An EMS, as applied at Sida, is one commonly used example of a tool for a systematic implementation and improvement of an organization's performance regarding a specific issue. The EMS has also been seen as on indication of a process characterized by a more clearly pronounced priority of the mainstreaming issue in relation to other demands, more transparent, with more internal communication and feed-back on results.

6.2 Implementation Guidelines should be Tailored to Fit the Situation and have Local Relevance

The knowledge and importance of the cross-cutting issue in the partner country has great influence on the possibilities for mainstreaming. There may be a local lack of understanding of the importance that Swedish donors attribute to actions which promote for example a better environment. Permanent structures normally exist in the form of environmental ministries, agencies and other public administrative entities, but their role and capacity often need to be strengthened.

The environmental priorities in partner countries have to some extent influenced the country dialogues and country strategies. National priorities have been the basis for contributions where environment is the target. However, their influence on the process of mainstreaming environment in programs and projects seems very small.

6.3 Linking of Mainstreaming Issue to Poverty Abatement

That there is a visible and logical connection between poverty abatement as an overarching goal for international development, and the mainstreaming issue is often mentioned as necessary for effective implementation. It provides a strong motive for interventions and allocation of funds.

The connections between poverty and environment have been described in general terms in documents developed by Sida. It is clear that poverty could constitute a serious threat to the environment and that environmental degradation could hamper social and economic development. Still, in many practical situations, the positive connection between environment and development is not visualized.

6.4 High Actuality of Issue Facilitates Mainstreaming, and so does Availability of Financial Resources

That a mainstreaming issue is on top of the agenda helps to gain understanding and motivation for its implementation. That the focus of interest varies over time and that there may be an element of "fashion" in opinions has been mentioned as an explanation for the varying success in implementation of policies. High actuality often implies that there are more resources available for cooperation. The best example is actions to act against HIV/AIDS in many African countries, which are said to have given a "push" for positive results.

6.5 Clear Commitment from Senior Management

A clear signal from top management to include mainstreaming issues is normally seen as having great impact on the behavior of the organization.

Environmentally sustainable development is clearly a priority in the Swedish governmental bill steering international cooperation and development. Sida's central documents also underline that environmental sustainability is one of the cornerstones for poverty reduction. Currently at Sida, when central guidelines are to be implemented in the field, and environmental issues have to share the space with many other issues, there is a gap between intentions and practice. There is rather a lack of support, by the management, for the implementation and prioritization of this theme than a lack of central signals. That there is little coordination between central policies is another complication, as all these issues have their specific advocates at the headquarter level. Sida's tradition of consensusbuilding rather than strong central directives and the infrequent follow-up of indicators other than economical per-

formance may also be factors explaining the current mainstreaming implementation performance.

6.6 Start with an Analysis of the Mainstreaming Issue

An environmental analysis and assessment normally precedes the development of an environmental management system, its goals and action plans. As Sida's environmental impact is mainly indirect through decisions influencing other actors, the analysis will have to be adapted to each decision situation. Thus, the use of EIA for each intervention and SEA for development of a country strategy is a logical choice. However, this evaluation has observed that the focus and form of this analysis is not adapted to the needs and reality in Sida's operations.

The environmental analysis that forms part of the country strategy process has to a varying degree influenced the final strategy. In many country strategies, there is no reference to the environmental situation whatsoever. This evaluation of environmental mainstreaming highlights the importance of getting enough information about instruments, such as legislation, and institutional capacity in the partner country for implementing environmental measures. This is important as a background for designing and introducing interventions, which support the national capability.

The new policy on integration of gender equality has chosen the strategy to have the analysis integrated into the poverty analysis and not as a separate gender analysis. This should be natural also in environmental mainstreaming, which supports the conclusion that environmental assessment has to be made in the larger context of the partner country's development situation and institutional capacity. A nearby approach has to some extent been developed in a form called Environmental Policy Brief, an assessment of how environment is integrated in the poverty reduction plan

6.7 Do not Focus too much on Negative Effects

As stated in this evaluation, negative environmental impacts are dominating in guidelines and other tools for implementation of environmental main-streaming. Several examples have appeared during the evaluation study of how negative environmental impacts of rather small significance have occupied staff and consultants a lot, while positive effects in national priorities and viewpoints are much less apparent.

More focus on positive effects would be more in line with the idea of development and improvement of the situation for the poor and can often be seen as typical for a more proactive than reactive approach.

6.8 Goals in Programs and Projects

Goals and targets within a management system tool do not only point in the desired direction, openly demonstrate ambitions and define results and deadlines to obtain, but also give a basis for regular monitoring and evaluation for the continuous improvement. They are also important for the communication of the expected outcome to everyone involved in implementation.

Goals and targets have not been found in implementation of environmental mainstreaming, neither at project or program level, nor at a more aggregated level. Formulation of environmental targets in specific projects would open up for a more continuous treatment of environmental aspects, including the positive ones, than is the case when environmental integration is handled mainly in a summary EIA before the project is planned. It would allow for the use of indicators during project or program effectuation. In budget or basket funding, goals and targets will have an even more central role, combined with development of national goals for environment in sector development.

6.9 Competence and Training that Include Mainstreaming Skills

A minimum level of competence in the field of the issue in question is necessary for successful mainstreaming. The professional background and personal commitment influence how well the issues are integrated, as much of how to succeed in implementation is left to the PO. For environmental mainstreaming this is more accentuated as few POs have a theoretical education in environmental issues. In general, Sida's staff has pointed at needs for better competence development, not least in practical effectuation of mainstreaming in different sectors and countries. More knowledge is also needed about mainstreaming in itself as a method in development.

6.10 Support from Advocates in Civil Society

Success of mainstreaming is related to activities and attitudes of the population in general. For communication, motivation and action, contacts with and support from advocates in civil society may give a strong support to mainstreaming implementation.

Civil society has been identified as an important partner for integration of gender equality and HIV/AIDS, for example for awareness and education. For environment, the participation of civil society seems less evident, although cooperation with environmental NGOs exists.

6.11 Structured Monitoring of Results

Lack of systematic monitoring and evaluation is a central comment in all three evaluations about mainstreaming at Sida. Experience and conclusions are not used for corrections and development of mainstreaming processes. As pointed out in the evaluation of gender equality, this leads to a loss of institutional memory, especially for an organization with high turn-over of staff such as Sida.

This observation has a strong connection with the earlier point about lack of goals and targets.

6.12 Mainstreaming of Environment Compared to Gender Equality and HIV/AIDS

ÅF experienced that integration of gender equality and HIV/AIDS have succeeded better than the integration of environmental issues, even if they share most of the problems discussed above. During the interviews it was observed that many officers found environment more difficult to integrate in their work than gender and HIV/AIDS. Among the reasons given were:

- Gender equality and HIV/AIDS are higher on the Sida agenda.
- Gender equality is easier to register and quantify.
- Gender and to some extent HIV/AIDS is closer to the professional background of many POs.
- HIV/AIDS is given more financial resources by Sida, especially in countries where it is considered a very central problem.
- Gender equality is more stressed in country strategies than environment.
 For the period 2000–2005, 46 country strategies reviewed, gender equality was stressed in 80% and environment in 41% of the country strategies.
 See Appendix 7 for more details on the review of country strategies.

Field Quotations:

"It is easier to see the connections of our work to other mainstreaming areas. It does not feel as natural to talk about environment as about mainstreaming of gender and HIV/AIDS, which usually feels more relevant "

Problems in common

A comparison of differences and similarities between the various mainstreaming issues, based on a review of two previous Sida evaluations⁴, shows that the three mainstreaming issues have many problems in common:

- Lack of goals and targets. More concrete goals and targets would facilitate both implementation and evaluation of mainstreaming.
- Guidelines and checklists exist but have limited relevance for the practical situation of contribution work.
- The professional background and commitment of the single PO influences greatly how well the issues are integrated.
- The focal points are considered important as a bridge between central policies and contribution implementation. Their role should be strengthened and their responsibilities better defined.
- It has been identified as very important for successful integration to relate cross-cutting issues to the local context in the partner country.
- The awareness and weight in the public debate in the partner country of the cross-cutting issue has great influence on the possibilities for successful integration.
- Lack of systematic monitoring and evaluation is a central comment in all three studies. As pointed out in the evaluation of gender equality, this leads to a loss of institutional memory.
- All three studies are concerned with how Swedish priorities and crosscutting issues can be maintained when "diluted" into a common standpoint from many donors with the increased use of budget, basket and sector funding.

Mitigating measures

Sida has implemented some measures for the integration of gender equality and HIV/AIDS that could vitalise also the integration of environmental issues:

- The new policy on integration of gender equality has chosen the strategy to have the gender analysis integrated into the poverty analysis and not published as a separate document.
- Civil society has been identified as an important partner for awareness raising and education for integration of gender equality and HIV/AIDS.
 For environment, the participation of civil society seems less evident, although cooperation with environmental NGOs exists.

Turning Policy into Practice: Sida's Implementation of the Swedish HIV/AIDS strategy", 2005, and "Promoting Gender Equality in Partner Countries: An Evaluation of Sida's Mainstreaming Strategy", 2002.

 Gender equality has a functioning international network for exchange of experiences, something that environment lacks completely.

6.13 Recent Evaluations of Environmental Mainstreaming in other Organizations

At least two studies have recently been published on mainstreaming of environment in aid cooperation. The Danish Institute for International studies has presented "Integrating Environment as a cross-cutting issue in Danish Development Assistance", 2005, and the European Union has submitted "Special Report No 6/2006 concerning the environmental aspects of the Commission's development cooperation", together with the Commission's reply. Both evaluations present findings in line with ÅF's findings in this evaluation. The complex of problems is most similar and shows the difficulties involved in translation of a policy into a functioning implementation strategy. A summary of the two evaluations is presented in Appendix 11.

The Danish study is limited to a review of sector programs but the EU study includes country strategies, projects, sector- and budget support. Both evaluations present the same overall result, valid for all kinds of contributions: Mainstreaming of environment is not handled in a proper way. The rules and regulations are not followed and there is no, or limited, follow-up. The focus, if any, is on risks and not on possibilities.

The reasons given for the lack of compliance with the environmental policies are similar in the two evaluations and also in line with our findings. Crosscutting issues are given little or no attention compared with poverty reduction, which is the main focus. The connection between poverty reduction and environmental sustainability is not recognised by the beneficiaries and thus disappears during the negotiations of sector and budget support. The group of crosscutting issues are handled generically, with the risk that none of them will receive much attention. A few good examples were found. But, they tend to be the results of a single individual's engagement rather than that of a well working system.

The evaluations indicate that environmental mainstreaming is very weak in sector- and budget support, weaker than in traditional project support. In the EU study, environmental conditions were attached to a budget support only in one out of 20 countries.

7 Considerations and Recommendations

The picture painted above has shown a situation where integration of environmental concerns is not fulfilled, in spite of a widespread awareness among staff that sustainable development is one of the overall objectives and that everyone is required to integrate environmental issues in his or her activities.

There appears to be a gap between the environmental policy, including its strategy for integration and available implementation tools, and the practical situation, both in Sida's organization and in the partner countries. This gap must be reduced.

The analysis of the situation has lead to a number of conclusions and recommendations regarding implementation of environmental integration, as well as mainstreaming in general. They focus on measures that are easily applied and do not presuppose major organizational or policy changes. Hopefully, they will give inspiration for concrete and immediate action with a direct practical value for Sida in its situation today.

Figure 7–1 on next page illustrates how a possible future implementation system for the environmental policy could be designed, leading to the mitigation of the major causes of non-compliance of the integration of environmental issues.

The recommendations are summarized in the following list, their place in the structure presented in figure 7–2 page 71:

- Break down the policy into concrete and understandable goals
 The POs must be helped through a policy broken down into pieces easier to digest, the implementation goals must be understandable and concrete.
- Integration
 Sida should further assist the POs with how to integrate the various mainstreaming policies in a concrete manner and develop a summarized support for how to achieve a balanced mainstreaming process.
- Integrate mainstreaming in sector policies
 The environmental theme should form part of all sector policies and not be a separate issue. POs carefully read the sector policies relevant for their work and mainstreaming must naturally form a part of the sector policy just as it should be a natural part of contributions.

- Introduce a screening process

A screening process for all projects should be introduced. It should lead to the division of contributions into two categories: projects that need a complete environmental impact assessment, and projects that need, what ÅF here calls, an environmental dimension analysis, where risk for negative impact is less prominent and factors combining development and environmental sustainability are in focus. The process should relate to the country, or cooperation, strategy and prioritize the environmental aspects that are most relevant for the specific situation.

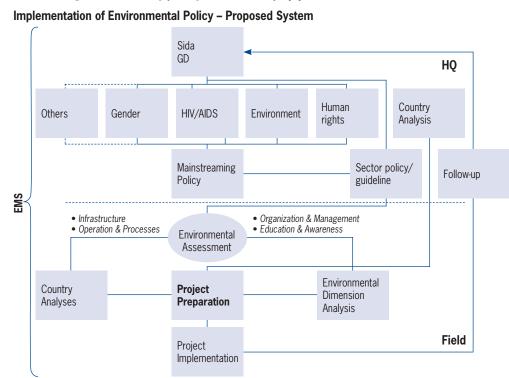
Improve monitoring and follow-up

Sida should introduce a monitoring and follow-up system of mainstreaming and environmental integration. Presently the lack of standardized follow-up of the environmental integration makes it difficult to improve the system as information on its present operation is unavailable. Also, the lack of follow-up has created a feeling among many POs that mainstreaming is less of a priority. The follow-up should be organized through the environmental management system.

Improved support for POs

The implementation tools must be made easier to use and the expert functions strengthened. The focal point and the EIA Helpdesk could

Figure 7–1. Illustration of possible future environmental policy system



give better and wider assistance and usage of experiences from earlier Sida contributions internationally could facilitate the contribution preparation process considerably for the single PO.

Make the responsibility for mainstreaming clear The responsibility for mainstreaming must form part of the management responsibilities in a direct way. In the present system the POs have the main responsibility while the managers have general overall responsibility for the operation and total quality. This has lead to a lack of prioritization of mainstreaming issues.

Figure 7-2. Summary view of the suggested measures and their place in the policy flow

Implementation of Environmental Policy - Proposed Improvements Sida GD H₀ Human Country Others HIV/AIDS Environment Gender Analysis rights Mainstreaming Sector policy/ G Follow-up Policy guideline В · Organization & Management Infrastructure Education & Awareness Operation & Processes Environmental Assessment E-1 E-2 Environmental **Project** Country Dimension **Preparation** Analyses Analysis Field Project Implementation

A Policy Update

New Policy Implementation Strategy

- B Coordinated mainstreaming
- C Mainstreaming integrated in sector policies/guidelines
- D Introduction of Environmental Screening
- E-1 Simplified EIA, more adapted to local conditions

- E-2 EDA, a new tool for contributions with obviously insignificant direct environmental impact
- F Improved Specialist Functions, i.e. focal point and helpdesks

 Define specific goals for integration of environmental issues
- G Complete the EMS
- H Adaptation to local conditions (environmental issues, EIA)

7.1 Environmental Management System

As stated above, Sida's Environmental Management System lacks certain components of standard EMS's. To secure implementation of the environmental policy it is important to use the system to the full extent.

It may be very difficult to express specific goals for improvement of environmental quality, emission reductions or reduced environmental impact in the partner country. This should, however, not be seen as a reason for not developing other kinds of goals and targets, which could strengthen the implementation of environmental mainstreaming.

Beside introduction of specific goals there is a need to introduce a proper follow-up system, a system for corrective measures and a management review that specifically consider the integration of environment in the contribution in order to take proper actions for continuous improvement.

The goal of the activities that concern Sida's direct impact on the environment from office premises, administration and travel, to continuously develop the concept of a "green office", is outside the scope of this project.

Recommendations

ÅF recommends Sida to:

- Develop general and specific goals for the implementation of environmental integration
- Use measurable environmental mainstreaming indicators in contributions
- Monitor and evaluate goals and targets
- Review and make corrective measures for continuous improvement
- Define responsibilities

The implementation should be followed by appropriate indicators.

7.2 Policy Update

Sida's environmental policy document includes background, approach, principles, and methods for implementation. In consequence Sida's environmental commitment is partly concealed behind a lot of text.

Most organizations have chosen to have a short policy which expresses the main visions and commitment. If adjusted to EMS standards and practice, Sida's policy would be easier to communicate to staff as well as stakeholders. The issue of too extensive and complex policies has also been raised by the evaluations of mainstreaming of HIV/AIDS and gender equality.

Moreover, it is easier to constantly develop policy statements, goals and working methods if those form separate and distinctive parts in a documentation system, where the elements can be updated individually when necessary.

Recommendation

ÅF recommends Sida to update the Environmental Policy and present it in a way similar to what is standard for EMS certified organizations.

7.3 Policy Implementation Strategy

Recommendation

ÅF suggest a working method, or strategy, for policy implementation adapted to the following corner stones:

- The Environmental Policy
 - An implementation strategy with less focus on EIA and more directed towards development of knowledge and taking into account better capacity and institutions in the partner countries.
- Understandable and concrete implementation goals
 It must be possible for the field to understand how to implement the policy, the targets must be possible to grasp and the concrete journey from policy to implementation clear. Ant PO must understand how the policy can be applied in a specific contribution. The policy needs to be broken down into understandable and concrete goals.
- Sida's actual contribution portfolio

 The attention portfolio

The strategy needs to reflect the fact that most of Sida's contributions concern management and training and not infrastructure or operation within the agricultural-, silvicultural- or industrial sectors. Also, cooperation with other donors through budget-, program- and sector support will be a more dominating feature in the future and the policy implementation strategy needs to be more adapted to this development.

The reality in the partner countries

The strategy needs to be adapted to the local situation in many of Sida's contribution countries with low availability of information and limited access to professionals skilled in environmental analyses.

Available resources

The strategy needs to consider the reality of administrating contributions at the field offices with limited economical and human resources, available for preparation of contributions. The current implementation strategy is very costly when carried out properly.

International apprehension of EIA

Sida's definition of EIA diverges considerably from other donors, international organizations and most cooperation countries. An adaptation to international standards could make implementation of EIAs in contributions smoother.

Recommendation

ÅF recommends Sida to update the policy implementation strategy in line with the above recommendations.

7.4 Mainstreaming Policy

There is a need to further prioritize and structure the implementation of mainstreaming issues. An attempt to enlighten the organization on how to handle the many mainstreaming issues has been made in the document "Goals, Perspectives and Central Component Elements". However, its contents do not seem to be spread in the organization and do not give a very clear and resolute guidance for the practical situation. It must be the responsibility of Sida's headquarters to better coordinate and develop methods for mainstreaming as a whole. It should also give active support to the field organization in development of local priorities for mainstreaming.

To better adapt mainstreaming to local conditions ÅF suggests it should be addressed in the Country Analyses and in the country dialogues.

Many POs and embassies have different opinions on what issues are considered cross-cutting issues that should be mainstreamed in all contributions. There is a need to make it easier to identify which issues should be mainstreamed. ÅF suggests that a list of the mainstreaming issues be compiled and introduced in for example *Sida at Work*, based on the eight central components already defined in the document.

Recommendations:

ÅF recommends Sida to:

- Coordinate mainstreaming at HQ. The HQ has the responsibility to overview the complete impact of all mainstreaming regulations. Also, there is a need to point out the mainstreaming issues in a central document.
- Define prioritization practices for the POs in the field. Some issues must be allowed to be more important than others, depending on local conditions in the region and the country.
- Integrate the mainstreaming issues in Sector policies and guidelines (see also below). If mainstreaming must be integrated in the contributions it must also be integrated in Sida's own documents.

 Provide POs with guidance on how to integrate mainstreaming issues in the practical day to day situation. The present guidelines are too removed from the reality and the actual practical problems.

7.5 Sector Policies and Guidelines

Interviews conducted indicated that the sector guidelines constitute important working tools for the POs, together with a few other main documents such as *Sida at Work*. Presently, environmental concerns are treated as a separate issue in Sida's policies and guidelines. ÅF suggests integration of environment and of other mainstreaming issues into sector policies and guidelines. This would put it into its context and demonstrate the possibility of synergies between environmental- and sector development and give all POs a clear and consistent picture of the mainstreaming task.

Recommendations

ÅF recommends Sida to develop the sector policies and guidelines to include environmental integration and other crosscutting issues.

7.6 The EA Process

The strategy applied so far, based on obligatory environmental impact assessment for all contributions, has proven inadequate in many situations. Thus, ÅF suggests it to be used only when relevant, i.e. mainly for projects including infrastructure or operations within the agricultural-, silvicultural-or industrial sectors.

ÅF suggests that all contributions should be divided into two categories through a screening type process called "Environmental Assessment" (EA). All contributions that need a complete EIA will be in the first category. The remainder for which an environmental dimension analysis constitutes a more suitable tool will belong to the second category. It is an essential feature of the EA that the contributions will be categorized according to the type of implementation process they practice, not according to their sector (as is common practice now).

The first category includes projects with infrastructure or operations within the agricultural-, silvicultural- or industrial sectors, i.e. contributions with a clear and distinct potential for environmental impact. The second category comprises projects working with organizational development, management, education and awareness. In the second category the EIA will be replaced by an Environmental Dimension Analysis.

Many partner countries are working with both Environmental Screening (initial EIA) and EIA.

Recommendations

ÅF recommends Sida to:

- To carry out an Environmental Assessment for all suggested contributions, a screening type process based on the projects' implementing process instead of its sector belonging.
- To do a complete EIA for all contributions dealing with infrastructure or operation within the agricultural-, silvicultural- or industrial sectors.
- To do an Environmental Dimension Analysis for all contributions working with organizational development, management, education and awareness.

7.7 Policy Implementation Support

To interpret and transform Sida's various policies into actions and activities, POs and other decision-makers within Sida must have support from the organization in the form of implementation tools.

These tools should be applicable, user-friendly, accessible and adapted to the actual conditions under which Sida is working.

7.7.1The EIA Guidelines

As discussed earlier in this chapter, EIA should be used primarily for contributions working with infrastructure or operation within the agricultural-, silvicultural- or industrial sectors.

The primary aims are to:

- Identify contributions unsuitable for support due to unacceptable environmental impact.
- Minimize direct environmental impact from contributions working with infrastructure or operation within the agricultural-, silvicultural- or industrial sectors.

The tool would follow the structure of the present EIA guidelines, with sectoral checklists, although less technical and less extensive to facilitate understanding and use. They should also be adapted to developing countries' situations, acknowledging the relevance of various environmental aspects and the availability of background information. The tools should also include methods and support for how to make necessary priorities and balance the benefits and the risks of a contribution.

Recommendation

ÅF recommends Sida to update the EIA tool and make it less extensive, less demanding and more adapted to the reality in the cooperation countries and to the actual working situation at the field offices.

7.7.2 The EDA Tool

The EDA tool should be developed for contributions working with organizational development, management, education and awareness.

The primary aims are to:

- Reduce any negative indirect environmental impact from a contribution.
- Initiate, support and favour development of an improved environmental situation and improved resource management.
- Assist the PO to perform an environmental analysis coupled with Sida's other objectives, mainly the poverty reduction analysis but with other mainstreaming issues, such as gender equality, and HIV/AIDS.

Table 8-1. Overview of the usage of EIA and the proposed EDA tool.

Type of contribution area	Process	Examples from field studies	Poverty perspective	Proposed tool
Infra-structure	Construction of installations that may impact negatively on the environment	Dams and hydro- power stations (Tanzania) Electrification (Uganda) Bus station in Bagamoyo (Tanzania)	Trade-off between the poor population's needs of energy, transports, goods etc and environmen- tal impact	EIA S
Operation and processes	Sustainable and environmentally acceptable use of natural resources	Forestry program (Bolivia) LAMP Project (Tanzania) EPOPA (Uganda)	Development of production, cultivation and markets methods, use of water, choice of materials, in cooperation with poor people in urban and rural areas.	EIA

Type of contribution area	Process	Examples from field studies	Poverty perspective	Proposed tool
Organization and management	Development of regulation, organ- izations and institutions that supervise and support environ- mental interests	Statistics project (Bolivia) "Ombudsman" (Bolivia) Informal sector (Bolivia) SME Program (Vietnam) Chamber of Commerce (Tanzania)	Defense of poor peoples' right to a good environment and health	EDA
Education and awareness	Increase knowledge about environ- mental issues	Education sector support (Bolivia)	Increase commitment and participation in environmental issues among all, no least poor people with less knowledge about the relation activity-impactmeasures	

Recommendation

ÅF recommends that Sida create a user-friendly practical new management tool; Environmental Dimension Analysis, that integrates the environmental dimension in contributions working with organizational development, management, education and awareness.

7.7.3 Specialist Support

The EIA Helpdesk

The EIA Helpdesk is very professional and has a very high ambition level. However, the way the help-desk works may lead away from, rather than enhance, integration and understanding of environmental concerns in the practical work. There is also an apparent risk that competence is not developed inside Sida's own organization.

The EIA Helpdesk should adapt its advice more to the situation in the cooperation country and become less bound to the complete checklists of the EIA Guidelines. More tailor-made advice enhances flexibility and the possibility to adjust to the actual situation. The EIA Helpdesk should also modify its work; the current strategy to answer questions in the form of questionnaires and demands for more information can counteract the aim to assist, as it cre-

ates more work for the program administrator. Also, as discussed above, it is often difficult to find all required information locally.

Recommendation

ÅF recommends Sida to work with the EIA Helpdesk along the following lines:

- The EIA Helpdesk should adopt a more flexible and pragmatic way of giving assistance by adjusting to the actual situation in the cooperation country. It is necessary to sort out the essential environmental aspects in a contribution and coordinate the analyses considering the limited access to information and human resources.
- The EIA Helpdesk should focus less on search for negative impacts according to the "no harm" thinking, and more on identification of potential for sustainable development and better resources management. The helpdesk should also look more at the environmental issues from an integrated perspective, in their context along with poverty abatement and the other mainstreaming disciplines like gender equality and HIV/AIDS. It needs to become an Environmental Integration Helpdesk.
- The EIA Helpdesk should assist the POs in a more practical and resolute way, offering more complete solutions, especially regarding proposals for environmental objectives and indicators to follow in the project or program. The helpdesk should find out the needs of the PO in order to solve the situation. It may be to receive a ready review of an EIA from the helpdesk or active help to further discuss the formulation of an EDA (Environmental Dimension Analysis) in cooperation with a helpdesk expert.
 - It could be an alternative that the EIA Helpdesk takes over the role of reviewing complicated full blown EIAs for contributions working with infrastructure or operation within the agricultural-, silvicultural- or industrial sectors from the local PO. To evaluate these types of EIAs is a complicated and demanding task that, according to our experience, requires specialist knowledge and experience in environmental matters.
- The EIA Helpdesk needs to market their services better in the organization.

The Focal Point Function

The person with the "Focal Point" function has special responsibility for environmental mainstreaming. This function is very well motivated as there apparently is a strong need among the POs at the field offices of support from environmental mainstreaming specialists. To facilitate for him or her to play a more important role in the integration of environmental issues there are a few measures that need to be taken:

- A detailed job description for the focal point function should be defined at central level and validated globally.
- The focal point person should receive extra training in his/her specialty and in how to work practically with integration in a contribution. There should be seminars at international level, or at least at regional level, where environmental focal point persons could meet and network as they are being capacitated. Policy or methodology changes should always lead to training for the focal point persons
- ÅF recommends that there should be a network for the focal point persons to facilitate exchange of experiences and assessments. All environmental assessments should be available through a database, where it is possible to search for assessments for former contributions. One person at the HQ should manage the network and act as a contact person into the HQ if a focal point has a need to discuss a special issue.
- Locally, at the embassies, the use of the focal point person should increase. It should be clear that he or she constitutes a valuable resource for other POs. The focal point persons should also take initiatives to promote their services and capacitate the others in their discipline.

Recommendation

ÅF recommends Sida to:

- Define a job description for the focal point function.
- Capacitate the focal point persons in their discipline as well as in how to perform the mainstreaming practically.
- Create a worldwide network for all focal point persons. Make previous environmental assessments available and searchable in a central database.
- Strengthen the role of the focal point person at the local level through e.g. internal marketing.

7.8 Program Officer

Key factors related to the PO's capacity of environmental mainstreaming are competence and work situation.

Most of Sida's staff has a background in economics, political science, international relations or law. Only few have deeper knowledge about science, technology and environment. To perform, or initiate and assess, qualified environmental analyses requires specialist knowledge. It is not possible to capacitate all Sida's personnel to a level when they themselves can conduct complex environmental analysis. They must however be aware of when it is time to call in an expert and when it is not necessary.

Environmental training has been offered and should continue. However, as long as the EIA regulation is so demanding and the environmental policy not broken down in locally adapted targets, it will be too difficult for a PO without an academic title in natural sciences or engineering, to comply. Thus, giving more short trainings to POs in general will not be the solution. The POs must be helped through a policy broken down into pieces easier to digest and through better support in their work.

The focus of the training for the POs should be on mainstreaming in practice, that is practical integration of environmental issues in the contributions. It is important to offer training opportunities apart from the short part of Sida's introduction course for new employees, not least for local staff who have fewer chances to get this. Also, it is important to discuss during the training how to handle the total situation with several mainstreaming issues, which is reality for the POs in the planning process. Improved tools, as discussed above, will contribute to better understanding and implementation.

Recommendations

ÅF recommends Sida to:

- Provide training in environmental aspects related to the contribution areas and focus on practical integration of environmental issues.
- Integrate environmental mainstreaming in sector specific training.
- Give advice on how to assess when environmental expertise is needed and where to find it.
- Pay special attention to NPOs (locally employed) as they do not have the same long tradition of Swedish views on environment and mainstreaming in general.
- Promote awareness and skills in mainstreaming in general and how to integrate several cross-cutting issues simultaneously.

7.9 Project Owner

To produce a sustainable effect on the local environment, cooperation should be built on acceptance and endorsement from authorities, project owners and organizations in the partner country.

Efforts to increase awareness of mainstreaming issues have mostly been directed by Sida to staff in its own organization. By extending the process to include project owners, NGOs and other local stakeholders, the understanding for the necessity of integration of environmental issues could be enhanced. This is even more necessary with the current trend towards more sector and budget support. A parallel can be seen in the new policy for main-

streaming of gender equality, which lifts up the importance of dialogue with local organizations more than has been done in the field of environment.

The current order prescribes that it is the responsibility of the project owner to perform the EIA and Sida's responsibility to review and approve it and to give advice on its contents, e.g. though elaboration of Terms of Reference. In the light of increased donor cooperation and budget support it is important to increase the capacity of the partner country to effectuate EIAs and to adapt its contents to an internationally satisfactory level. An interesting development would be to invest more support from Sida in the EIA process, for example by using a third part for the EIA and include this as a component in the contribution.

Recommendations

ÅF recommends Sida to:

- Promote environmental mainstreaming more actively through Sida's contributions in the cooperation countries, e.g. institutional development and implementation support.
- Work more actively with policy issues with NGOs, Swedish as well as local, and provide support to strategically important, non-governmental activities in the environmental field.
- Increase the ability for the partner country to take responsibility for the EIA process by including EIA performance and education in contributions.

7.10 Follow-up

Projects

Presently there is no regular follow-up of the results of the environmental integration. To make a good follow-up possible (through the EMS) targets must be set and indicators identified for each contribution. The project owner and the PO should in cooperation set targets for environmental integration in the contribution and identify proper indicators. The targets should be based on environmental priorities for the partner country and the sector guidelines should give support as well as examples of good practice from similar projects already carried out (in any cooperation country).

The performance of the contribution should be followed-up by indicators continuously during the implementation. The final outcome of the project should be reviewed and evaluated. The result should be reported according to Sida's regular follow-up routines.

The follow-up of mainstreaming in general could be improved in regular contribution evaluations and the results should be highlighted in the annual report to the Board (Annual Report of Sida Evaluation Activities).

Recommendations

ÅF recommends Sida to:

- Set targets for environmental performance in all contributions (when relevant)
- Define proper and measurable indicators to follow up the targets
- Highlight mainstreaming in the Annual Report of Sida Evaluation Activities

Sector and budget support

It is important for Sweden to disseminate knowledge and good practices in many areas, not only for environment but also for other mainstreaming issues such as gender equality, HIV/AIDS and human rights. Also in the dialogue between the donor community and the partner country is it important to "stand up" for the positive reputation Sweden has as a watchdog for environment and for its environmental knowledge and integration skills. In the basic discussions and negotiations within the donor community, it is necessary for Sida's personnel to be able to see to that Swedish priorities will penetrate the result of the discussions. The POs must be skilled in negotiating with the other donors. And they must be able to put forward the most important aspects and how they should be monitored with indicators reflecting the political and administrative system in the partner country.

For the dialogue with the partner country, a higher degree of competence in analytic skills and dialogue perspective will be required. Political prioritizing will generate more impact. Ability will be needed to assess the country's own possibilities to integrate environmental considerations and how these best could be developed. It is important at this stage to support the partner countries in developing reliable and timely tools linked to national development goals, poverty reduction strategies, cross-cutting mainstreaming and visions based on a regional and national perspective. How environmental progress will be monitored and with what indicators are also important aspects.

Recommendations

ÅF recommends that relevant Sida staff improve their understanding and insight, and that Sida aims for related capacity development and training of at least the following:

Increase of the competence in dialogue use and analytical skills.

- Knowledge of how to assess the environmental mainstreaming implementation capacity of a partner country in an overall perspective.
- The issues of fair resource allocation mechanisms during the national budget process and the capacity of the current public financial management systems.

7.11 Country Analyses

Sida collects and compiles large amounts of information on the environmental situation at the country level. Sida has also a well-developed system for analysing the environmental situation in the partner country in form of field staff and the SEA helpdesk. These assets could be used more efficiently.

Not only should the environmental conditions and information on environmental performance in the country be analysed, but also the existing legislation, legal procedures, compliance with the legislation, institutional capacity and environmental priorities should be present in the country analysis. It is an advantage if at least part of this information also appears in the country strategy, as this document constitutes a key document for many stakeholders. One possibility would be to define environmental priorities in each country analysis. They could give guidance in the development of contributions as the POs could focus on problems that have local relevance.

Priorities will also make it easier to find the best set of indicators for programs as well as for projects. The situation today, where indicators are seldom developed and used, is not satisfactory.

When setting targets and making priorities there is always a risk to oversee something and not come up with the best solutions. However, by not setting targets and making priorities there is a risk that the policy will not result in actions that are linked all the way to the receiver of the aid. The risk to make the wrong priorities in some cases is the price to pay to succeed with the implementation. A system with proper follow-up and correction should minimize that risk. It should also be pointed out that today's situation where priorities in practice depend on individual knowledge and motivation with the PO, is less satisfactory than one with general priorities, based on knowledge about the actual situation and its possibilities.

Recommendations:

ÅF recommends Sida to:

- Include information on environmental legislation, level of compliance with the legislation, institutional capacity and environmental priorities in all Country Analyses.
- Expose positive environmental aspects in the analysis.

- Define environmental priorities in Country Analysis
- Make better use of the environmental information from the Country Analyses for the continuous work with contribution development at the embassies.

7.12 Concluding Remark

Mainstreaming of environmental issues is a complex and difficult task in international development cooperation. ÅF has found that Sida has not yet succeeded in fulfilling the ambitions in the environmental policy. We hope that this evaluation can assist Sida in understanding the problem and believe that the recommendations given can improve the integration of environmental issues and make it more in line with the ideas of the environmental policy.

8 List of Appendices

Appendix 1	Terms of Reference
Appendix 2	List of interviewed persons
Appendix 3	Environmental Considerations in Sida Evaluations 2005 (on CD-ROM)
Appendix 4	List of reviewed Sida documents (on CD-ROM)
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Appendix 1 Terms of Reference

Introduction

In accordance with the evaluation plan approved by Sida's Board, UTV will evaluate the extent to which environmental concerns have been integrated into Sida's work. For empirical material, the evaluation will focus on the treatment of environmental issues in a number of Sida documents. Rather than to make a direct cross-sectional comparison between different units, the study aims to identify changes in the treatment of environmental aspects over time. Moreover, the study will include field studies in what may be labelled "critical cases" in order to determine the degree of implementation in the field, and the extent to which policy statements correspond to actual practices in the development co-operation.

This evaluation will also form the basis for an attempt to explain what makes a mainstreaming strategy such as the one put in place for environmental sustainability succeed. Accordingly, the evaluation will provide evidence on both the actual implementation of Sida's policy for environmentally sustainable development, and on Sida's general capacity to put integrative strategies into practice.

Intervention Background

Environmentally sustainable development¹ is a central component in Swedish development cooperation. As the Policy for Global Development notes, sustainable development is closely linked to poverty reduction, and Sweden shall bring "environmental sustainability consistently into account in growth and development strategies, both at the national and international levels" (Government of Sweden 2003).

To that effect, Sida in 1996 created an environmental management system (slightly revised in 2004), which included a yearly report on the issues related to the theme, a plan of action, and a policy for sustainable development. A core feature of the policy for sustainable development is the principle that environmental considerations shall be integrated in all aspects of Sida's work, and that analysis of environmental aspects shall be performed for every proj-

Environmental sustainability is here taken as relating to the sustainable use of natural resources, and the absence of contamination of one's external environment.

ect and country strategy. Responsibility for implementing this goal is decentralised, i.e., all staff members have responsibility to consider environmental aspects within their area.

Swedish international co-operation is generally recognised as relatively advanced in environmental thinking and strategy (cf. OECD 1996; OECD 2004). Even so, previous evaluations have indicated that the extent to which environmental considerations are integrated into individual projects varies between departments. For instance, a superficial review by Sida's network of comptrollers found that implementation of the mandatory environmental impact assessments in a sample of projects oscillated widely between departments, ranging from zero (SAREC, DESO) to 91 per cent (RELA, ASIEN, AFRA).

This raises the question of what furthers or obstructs the implementation of a policy of this kind. In this regard, different answers have been advanced, for instance:

- In their response to the study by the network of comptrollers, Sida's environment policy division suggests that there may be "differences in culture regarding respect for rules" which account for the variation. Alternatively, it notes that the environmental assessments may often be implicit, and that education in this regard needs to be intensified, implying that there might be a knowledge deficit in this area.
- The helpdesk at the Swedish University of Agricultural Sciences, in their response to the same study, argues that one reason may be insufficient treatment of the issue in manuals such as Sida at Work.
- A study of how environmental considerations are included in Sida's evaluations (SSE 03/02) listed four factors to be further examined: Lack of clarity in Sida's policy; lack of knowledge regarding environmental issues at Sida; lack of time among staff for making such assessments; and lack of incentives to perform this kind of analysis.

In sum, possible factors affecting the implementation of the environmental policy can be divided into some general headings:

- Factors relating to the general situation of desk officers (e.g. work-load, number of goals to consider simultaneously, extent of knowledge).
- Factors relating to particular departments or units (e.g. culture, encouragement from managers, the salience of environmental issues in their area of activity, nature of cooperation partners).
- Factors relating to Sida's co-operation partners (e.g. different priorities, degree of attention to environmental issues).
- Factors that are specific to the relationship between environmental issues and Sida's work in general (e.g. the relative complexity of the environmental issues, the multidimensionality of development cooperation, and treatment in Sida's manuals).

Factors inherent in the particular mode of implementation chosen (e.g.
the dispositions of the policy itself, the structure of control functions, the
incentives offered, and support from help-desks).

It is the goal of the present evaluation to distinguish and weight the influence from these, and other, factors on the integration of environmental concerns into Sida's work. Such an assessment is crucial for further efforts to enhance the implementation of Sida's policy for sustainable development, and may also contribute to knowledge necessary for policy implementation in general.

Evaluation Purpose and Focus

The rationale for the present evaluation is to contribute to Sida's ongoing work with regard to environmentally sustainable development. The ten years that have passed since the environmental management system was first adopted allows for a thorough assessment of the evolution of environmental considerations within the organisation, as well as a consideration of possible alternatives that may enhance the treatment of these themes.

Additionally, the present evaluation will add to our knowledge of Sida's capacity for implementing policies of an integrative or "mainstreaming" kind. Two previous evaluations have assessed Sida's performance with regard to gender and HIV/AIDS, and the present evaluation will allow for a comparison between the implementation of these three themes, and hence for more general conclusions in this area.

Accordingly, the concrete purpose of this evaluation is to assess the extent to which Sida as an organisation adheres to the principles and obligations set out in its policy of sustainable development, and to present explanations for the degree of implementation of this policy. More concretely, the study will consider three different sets of questions:

A first part of the evaluation will study the extent to which environmental considerations are integrated into Sida's key policy documents (overarching and sector policies, country strategies). A set of interviews with Sida staff shall be undertaken in order to substantiate findings.

A second part will rely on field studies to assess the extent to which environmental considerations are present in the projects and the dialogue that Sida maintains with partner countries. Furthermore, this part of the evaluation will assess the extent of co-operation between Sida and other donors (including multilaterals) with regard to sustainable development.

A third part will, on the basis of data from the previous components along with additional interviews, address the factors affecting such implementation in order for it to be improved, and to provide lessons that could ideally be transferred to other policy areas. This part of the study shall also address the overall success of capacity building within Sida with regard to environmental considerations.

Stakeholder Involvement

In order to perform the present evaluation various groups of stakeholders need to be included in the process. For that purpose, an advisory committee will be established for the evaluation, and other key persons will be approached on a direct basis.

The advisory committee (the formation and administration of which shall be the responsibility of UTV) for the preparation and execution of the evaluation should ideally be composed by representatives from UTV along with staff from the environment policy division and from the policy and methods department, i.e., the two Sida units most intimately related to the focus of the evaluation.

It is important that the evaluation be assumed by the organisation as a whole, rather than being seen as a preserve of the staff directly involved with environmental policy. Thus, it is essential that preliminary results and recommendations from the evaluation be communicated on a direct basis to key persons in the organisation, in order for them to provide feedback to the evaluation and to disseminate its final results. Examples of such persons are the heads of Sida units, key persons in Sida networks, etc.

It is the task of the consultants to perform an analysis of the possible stakeholders for their evaluation, and to take into account the interests of such groups during the assignment. For that reason, it is vital that the consultants from the beginning of the assignment try to maintain contacts that allow groups with an interest in the evaluation to comment on decisions and drafts made during the process of evaluation.

The embassies and Sida offices visited shall also be given the opportunity to present their views, ideally at a concluding seminar at which the consultants present their impressions from the field study in question.

Evaluation Questions

The questions for the evaluation concern the extent to which Sida's policy for environmental sustainability has been implemented in the organisation, and the reasons for the degree of implementation. The relevant policy document states that environmental considerations shall be "included in the analysis of countries, sectors, programmes, and projects". Hence, relevant questions for the three parts of the evaluation include the following:

Study of Key Documents and Interviews:

- Has the extent and nature of integration of environmental aspects in Sida's policies and country strategies changed over time?
- Are there significant differences between different areas/units with regard to trends in the integration of environmental aspects?

Can any general increase in Sida's competence in the area of environmentally sustainable development be detected?

Field Studies:

- To what extent do environmental concerns appear to guide the selection, design and management of individual projects?
- To what extent does staff appear to possess sufficient consciousness/competence in the field of environmental sustainability?
- To what extent are environmental concerns present in the dialogue with the partner country?
- What is the treatment given to environmental issues in development cooperation in general?
- To what extent does Sida interact and co-operate with other bilateral donors and with multilateral institutions with regard to sustainable development?
- What are the reasons for the degree to which environmental issues are considered in the country strategy?

Explanatory Study:

- What may account for variations in the extent to which environmental aspects are included in the work of Sida's departments?
- What lessons can be drawn from those departments that have been more/less successful in integrating these aspects?
- Are the instruments available (documents, helpdesks, etc.) perceived as equally useful for all areas of development cooperation?
- How do relations and dialogues with partner countries impact on the integration of environmental concerns?
- What can be done to further enhance the integration of issues of sustainable development into Sida's work in terms of incitements, support functions, etc.?

Recommendations and Lessons

This evaluation is in the first place exploratory, i.e., it aims to provide a general overview of the extent to which environmental considerations are included and integrated into the work of Sida. Furthermore, the evaluation shall address the question of how such integration can be enhanced in order to fulfil the requirements of the policy for sustainable development. Ideally, the conclusions and recommendations should be directed both at the differ-

ent departments at Sida, and at the units set up for that particular task (e.g. the division for environmental policy).

In more general terms, this evaluation is focussed on the implementation of a "mainstreaming" policy. Accordingly, recommendations should also consider how such initiatives can be enhanced, and what may be the most suitable way to mainstream policies across the organisation. In this regard, the consultants should juxtapose their findings with those of similar evaluations (i.e., of Sida's implementation of its gender and HIV/AIDS policies).

Methodology

The evaluation shall be performed in steps: A first, descriptive step shall consist in an assessment of the extent to which environmental aspects are considered in Sida's policies (overarching and sector) and country strategies. The information gathered through a document review shall be complemented with interviews to substantiate and expand the findings.

Second, on the basis of the review of the country strategies, four cases shall be selected for field studies, corresponding to the countries where environmental concerns are prominently present in the strategy and ones where such considerations are more or less absent. Field studies in these "critical cases" can subsequently generate information of the extent to which country strategies are actually implemented, reasons for the presence/absence of environmental concerns, problems encountered in the implementation, and so on.

A third and final phase will consist in further interviews in Stockholm, with a particular focus on the departments and units that stand out from the average in terms of treatment of environmental aspects.

First step: Document study and overview

In the first phase, the aim is to ascertain the extent to which environmental issues are treated in different areas and sectors. However, focus shall primarily be on changes over time, rather than variations encountered between different areas. Hence (at least) two points in time (i.e. one previous and one current document) are needed in order to make an assessment of the direction and extent of any changes detected.

The assessment will deal with country strategies and key policy documents. Furthermore, previous reports and interviews should be used to add to the picture.

Below, each of these data sources is outlined in more detail:

 Country strategies. The examination of these documents shall be used both to give an indication of variations over time and between departments with regard to the treatment of environmental aspects. To that

- effect, all current country strategies shall be included, along with previous ones for the same countries dating back to 1996.
- Sector policies. A revision of the entirety of Sida's sector policies and general policy documents (e.g. Sida at Work) shall be performed in order to assess the extent to which considerations of environmental sustainability are included. In practice, this amounts to some 40 documents. Furthermore, whenever possible this assessment shall be juxtaposed with previous policies in order to estimate variations over time.

While the previous two sources of data comprise the main focus of the descriptive part of the evaluation, two additional sources shall provide for background and a general overview:

- Interviews. During the first phase of the study, a sample of Sida's desk officers from different units (some 20–30) shall be interviewed along with the environmental policy unit and staff at the help-desks in order to gain a general overview of how these issues are handled, and what differences over time and between departments are perceived. In that sense, the interviews should also be used to test the validity of the findings that have emerged from the document study.
- Previous reports. In order to get a general overview of the subject, the
 consultants shall also consider the reports provided by the help-desks at
 SLU and Gothenburg University, and the annual environmental management system reports drawn up by the environmental policy unit.

In order to enable the handling and presentation of a large amount of data in a systematic and comparative manner, a framework of analysis and measurement shall be designed that allows for a comparative assessment of the extent to which environmental aspects are considered in these documents, and how such considerations are included.

Examples of key aspects to include in such a framework of analysis are the extent and type of treatment (e.g. perfunctory, integrated, separate), how the relationship between environmental issues and poverty is depicted, and the place that environmental considerations occupy in the overall analysis (what themes is it related to, whether it is present among the stated goals, what environmental problems are stressed, etc.). In this regard, the framework of analysis previously used to assess the integration of environmental concerns into country strategies could serve as one example of how such a scheme of analysis could be developed (Miljöenheten 2004). Comparison can also be made with the "mainstreaming scale" employed for the evaluation of Sida's gender policy and the "mainstreaming score" employed in assessing the treatment of HIV/AIDS in country strategies, but the consultants are urged to adapt and develop such measures further.

Second step: Field studies

Based on the results of the review of country strategies a selection should be made of what may be dubbed "critical cases", i.e. four countries that stand out from the mean either because of the prominence of environmental concerns in the country strategy, or because of the relative lack of such attention.

These cases should subsequently be used to test the validity of the findings in the previous step, to gain an increased understanding of the challenges and opportunities available in a field situation, and to provide a concrete assessment of Sida's actual performance with regard to environmental issues. During the field studies, the primary task is thus to test the extent to which country strategies correspond to Sida's actual performance in the country, and what concrete challenges there are to the effective implementation of the mainstreaming of environmental concerns.

During field studies, the consultants shall interview the staff of the Swedish embassies and offices included, along with a selection of representatives from the partner country and other donors.

Final phase: Synthesis and explanation

On the basis of the findings of first and second phase, and particularly any variations encountered, the final phase of the study will make a synthesis of the findings and complement the previous material with additional interviews in order to account for the extent and evolution of environmental considerations within different departments. Two sets of data will be of importance here:

- Interviews with desk officers at Sida's headquarters. The interviewees shall be selected on the basis of the results from the survey of the previous phases. In particular, focus shall be on units that stand out from the mean in terms of integrating environmental concerns.
- Content analysis of the instruments. In view of the results from the first
 phase, the package of support functions offered in relation to the policy
 (i.e., documents, education, helpdesks, etc.) shall be considered with regard to consistency, availability, and perceived utility. A similar assessment from an environmental perspective shall be performed for Sida
 documents of a more general character (e.g. Sida at Work).

Work Plan and Schedule

The following estimates should be seen as guidelines (times to be shared between consultants):

• *First step* (fourteen weeks total):

Development of framework for analysis (one week).

Policy and country strategy study (five weeks).

Overview of previous evaluations and studies concerning the theme (three weeks).

Interviews and reporting (five weeks).

• *Second step* (eighteen weeks total):

Ten-day visits for two persons to four embassies (sixteen weeks)

Reporting and travel (two weeks)

• Synthesis and additional interviews (eight weeks total).

Additional interviews at Sida (three weeks).

Content analysis and reporting (three weeks).

Editing final report (two weeks).

The selection of cases and interviewees for the second and third step will be based on the results of the first phase. Thus, the consultants shall undertake to discuss the results of the first phase with UTV and with the advisory committee prior to embarking on the subsequent phases.

Reporting

The following reports shall be presented from the evaluation:

- After the assessment of a smaller part of the material to be considered (some ten percent of the policy documents involved), an inception note shall be prepared which shall discuss the applicability of the method of measurement used.
- The consultants should undertake to present a first report on the results
 of the descriptive study performed during the first phase. This report can
 be rather short, and should ideally limit itself to a description of the
 methodology employed, overall findings, and recommendations as to
 what particular aspects should be dealt with in the subsequent phases of
 the study. Moreover, it shall also suggest cases for the field studies.
- Each field study shall be separately reported in a brief field report (ideally, some five to ten pages) that shall summarise the main findings from each visit. The relevant embassies shall be given the opportunity to react and respond to these reports.

On the basis of the previous reports, and on the additional findings from
the final set of interviews, the consultants shall present a final report that
shall, in addition to what has been discussed in the previous reports, relate the findings to a broader discourse on implementation, mainstreaming and similar issues. Explicit reference shall also be made to how the
findings relate to similar evaluations previously commissioned by Sida
and by other donors, when available.

The final evaluation report should not exceed 60 pages, excluding annexes. Format and outline of the report shall follow the guidelines in Sida Evaluation Report – a Standardized Format. Relevant photographs are welcomed. A draft of the report shall be submitted to Sida electronically and in three hardcopies (air-/surface mailed or delivered) no later than February 20, 2006. A final version shall be submitted to Sida no later than March 15, again electronically and in three hardcopies. The evaluation report must be presented in a way that enables publication without further editing.

The assignment also includes the production of a Newsletter summary that should follow the proposed outline for the Sida Evaluation Newsletter, as well as the completion of an Evaluation Abstract in line with Sida's instructions. These products shall be submitted along with the final report.

All reports shall be written in English. In case the consultants are not English native speakers, the reports may be subject to language editing.

In addition, the team leader shall report to UTV on the team's progress on a regular basis, including any problems that may jeopardize the assignment.

Evaluation Team

The evaluation team should ideally possess documented knowledge of both organisational factors related to steering and policy implementation, and of environmental issues. In addition, it is crucial that the team possess knowledge of Swedish, of Sida's organisation, and of Swedish development cooperation. Ideally, the team shall separate tasks among their members according to their competence.

Tendering

In their tender, the consultants are asked to sketch an outline of the proposed scheme of analysis that they will employ, along with a description of their competence to make an analysis along the lines proposed. Furthermore, the consultants are asked to elaborate on what they see as key aspects to be covered in both the descriptive and the explanatory phase.

For estimating the reimbursable costs for the evaluation, the consultants can use the following four countries for field studies: Philippines, Tanzania, Ethi-

opia, Indonesia. These are randomly selected cases and it is likely that none of them will appear in the final sample (which will be decided on the basis of the first part of the assessment). Basing calculations on these four allow for easy comparison between different tenders.

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Appendix 2 List of Interviewed Persons

Sida HQ

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Namn	Avd	
Maria Brdarski	NATUR	
Johan Sundberg	NATUR	
Ola Carlsson	Europa	
Peeter Kaaman	Europa	
Annika Otterstedt	NATUR	
Henrik Norberg	Europa	
Petter Meirik	Europa	
Ola Möller	NATUR	
Tomas Kjellqvist	Europa	
Ingvar Andersson	NATUR	
Marie Jusnes	Europa	
Britta Nordström	DESO	
Ola Hällgren	SEKA	
Doris Attve	SEKA	
Katrine Larsen	AFRA	
Barbro Wiberg	SEKA	
Peter Eriks	DESO	
Susanne Spets	AFRA	
Sara Martinez Bergström	RELA	
Helena Lindquist	RELA	
Johan Brisman	Asien	
Per-Einar Tröften	INEC	
Ulf Ekdahl	INEC	
Carin Zetterlund-Brune	SEKA	
Tomas Bergenholts	Asien	
Carl Fredrik Birkoff	AFRA	
Christian Lien	DESO	

Pontus Modeer SEKA
Camilla Lindström Asien
Paulus Berglöf DESO
Torgny Svenungsson RELA
Karin Sverkén AFRA
Marie Bergström INEC
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Appendix 10 The Field Perspective

1. Scope

1.1 Introduction

As part of the evaluation of Sida's work with environmentally sustainable development, the evaluation team visited six embassies and offices with Sida representation. As the evaluation to a major part has focused on the situation in the field the findings presented in this report constitute fundamentals for the overall outcome of the evaluation.

Three of the embassies; Bolivia, Tanzania and Vietnam, are largely independent, so called delegated embassies (with the right to make their own financing decisions up to 50 MSEK) and three of them are smaller offices with more limited local authority; Albania, Kosovo, and Uganda. The current report focuses entirely on experiences and findings achieved during these field visits and is presented from the view of the field.

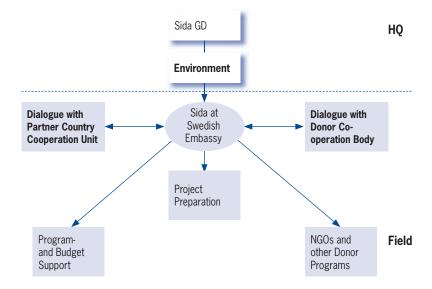
The site visits took place in December 2005 and January to March 2006. The delegated embassies were visited by two consultants during two weeks and the smaller ones for a few days each.

1.2 Scope

The scope of the field visits is represented in the figure on next page. The filled fields all belong to parts included in the field visit, the white ones belong to parts of the evaluation that were covered prior to the field studies, at the HQ in Stockholm and through interviews with Sida's helpdesks in Uppsala and Gothenburg.

1.2.1 Interviewees

At each embassy all the available personnel (program officers and managers), were interviewed individually. In addition, representatives from major contributions and Swedish NGOs were interviewed about their view on how Sida is working with environmentally sustainable development. In Vietnam, Tanzania, Bolivia and Albania we met with representatives from the host country's donor cooperation unit to discuss how environmental sustainability



is discussed in the country dialogue. How Sida's policies are regarded in joint contributions and programs were discussed with representatives from the donor coordination body.

Interviews with program officers

A large number of interviews were with program officers (POs) sent out from Sweden or national program officers. The main issues discussed with the POs were how they integrate environmental issues in contributions. The interviews followed a basic and open questionnaire covering background education, specific training in mainstreaming issues received from Sida, how long they had been with Sida and in what positions.

Based on rather open questions we discussed their perceptions of Sida's environmental commitment, policies and how these influence their work. The focus of the interviews was on what each employee believed characterized Sida's environmental policy, its main features, and how it is thought to be implemented in the daily work. The discussions also covered how they cooperate internally and with the HQ in Stockholm, with Sida's Department for National resources and Environment (NATUR) and with the Environmental Policy division. Other central issues discussed were which documents that are most used and useful in the work with environmental integration, Sida's organizational policy implementation support and how mainstreaming issues in general are treated in the field.

Apart from their personal opinions and experiences of policies and policy implementation we heard of their experiences of how the cooperation country's cooperation unit, local project owners and stakeholders managed to understand and include Sida's environmental policy.

Interviews with managers

The interviews with the managers covered the same issues as for the POs but also covered their work with promotion of integration of mainstreaming issues in their organization and the quality system used for follow-up of especially mainstreaming. The competence of the staff was also on the agenda. A special issue brought up with the managers was how they define the role of the focal point person. At some embassies, the issue of basket and budget funding was also treated.

Interviews with local project committee members

In all visited embassies all available members of the local project committee were interviewed about how mainstreaming in general and especially mainstreaming of environmental issues were brought up in the committee. The principles and methods of the committees' work were discussed as well as deficiencies and strengths in the handling of mainstreaming issues.

Interviews with focal points

The focal points at each delegated embassy were interviewed in detail about how they considered the role and the responsibilities of the focal point. All the focal points were interviewed, but naturally the interviews with the environmental focal point were more detailed. Further we discussed how they felt about their capability and preparation for fulfilling the task and how they worked in their job as focal point person. Other major issues were how the organization and the HQ managed to support their work and how they experienced their local management's as well as the HQ's strategy for implementation of the mainstreaming policies.

Interviews with country cooperation unit

In Vietnam, Tanzania, Bolivia, Uganda and Albania, representatives from the country cooperation offices were interviewed about how mainstreaming issues are considered in the cooperation agreements, how they experience the mainstreaming policy and its implementation and how the country itself works with mainstreaming or corresponding strategies.

Interviews with donor coordination body

Representatives from a number of the donor coordination units were interviewed about their views on how Sida's mainstreaming policies and prioritizations can be considered in the group of international donors and on how mainstreaming can be considered in program- and budget support.

Interviews with Swedish NGOs

Representatives from Swedish NGOs working in the visited countries were interviewed on how they work to integrate Sida's mainstreaming policies and environmental prioritizations into their own contributions. Their own mainstreaming policies, with special focus on environmental issues, were discussed. They also gave their view on how they considered the local climate for implementation of mainstreaming strategies and discussed differences between the various mainstreaming issues.

Interviews with contribution owners

A limited number of contribution owners were interviewed about how they had handled environmental aspects in their contributions and about how Sida initiates contact and goes through the complete project implementation informed about mainstreaming requirements. It was also discussed how they thought it would be possible to integrate environmental issues in their activities.

1.2.2 Review of strategic country documents

For all the visited countries the following strategic documents were reviewed and analysed:

- Country Strategy

The country strategy is the document guiding the cooperation with the country, published by the Swedish Ministry of Foreign Affairs. The country strategies were studied as part of this evaluation, the results are discussed in the main report.

Country Analysis

The Country Analysis has been reviewed for all visited countries and the analyses compared with the final prioritizations given in the country strategy. An analysis of the environmental situation is, as we have found, always present in the Country Analyses even if it later is absent in the Country Strategy.

Country Plan

The Country Plan is Sida's interpretation of Swedish Ministry of Foreign Affairs' Country strategy. Thus, it should be noted that the Country Plan present a somehow adjusted idea of the priorities in relation to the Country Strategy. We have noted for some of the visited countries that environmental integration is more highlighted in the Country Strategy than in the Country Plan.

Country Report

We have noted that the presentation of environmental issues is addressed through reporting the progress of the environmental projects, i.e. projects with an environmental focus. Environment as an integrated issue is not analysed.

Overview of project documentation

At each embassy, available documentation from ongoing or recently finalized major contributions was reviewed and the degree of environmental integration was estimated. The available documentation varied considerably between contributions, but normally consisted of some preparation documents, an assessment memo, the decision and some kind of report. A Logical Framework Analysis, a ToR or an evaluation report were more rarely present.

In total, the review of documents at the visited embassies included 89 contributions. For each contribution, we reviewed how the integration of environmental issues was accomplished. We searched for any available statements in any documentation in the contribution folder. When environmental mainstreaming was mentioned we assessed the quality of the statement or analysis and classified it as a standard sentence without depth, a shallow analysis based on a short process of reasoning or a correct environmental analysis.

Finally, ÅF also did a rough estimation on whether the treatment of environmental issues was sufficient or not based on the principal area of the contribution, its activities and how the parts on environmental integration were written.

1.2.3 Environmental situation in cooperation country

In all visited countries ÅF tried to understand the general environmental situation to assess whether there was any correlation between actual environmental problems and integration of environmental issues. The analyses included the following components:

- General problem description
 - Issues to be included in an analysis: How is the pressure on the environment? Present environmental status and relevant problems like soil degradation, deforestation, emissions to air and water and destruction of biotopes. State of the legislation and degree of implementation. Public/political weight of environmental issues and sustainable development.
- Awareness and prioritizations
 - Factors that influence the possibilities to successfully implement integration of environmental issues include public awareness, view and opinions among public institutions and national-, regional- and local authorities. How is the industrial sector working with environmental measures? Do firms comply with the legislation? How does the monitoring and control system function? All factors that do not directly inflict the environmental integration but that greatly influence the result as they define the general ambience.

2. Observations of Mainstreaming in the Field

2.1 The Embassy

2.1.1 Program Officers

Most Program Officers find themselves in a situation full of requirements where the time set aside for administration of contributions is limited. Given this, there is a general opinion among those persons interviewed, that the environmental policy is too ambitious and too demanding to comply with.

To cope with the many requirements posed by policies and regulations the POs need distinctive tools and organizational support. The tools from guidelines or instructions should help to bridge the gap between the policy and the reality and facilitate the implementation. The organization should give support to the work in terms of clear prioritization of rules and definition of realistic targets for the operation. Our evaluation exposed inadequacies within both these areas.

Policy apprehension and implementation tools

To summarize the interviews with POs: They are aware of the environmental policy but not familiar with its contents, requirements, where to find it, or how to implement it. A large majority of the POs have difficulties to see how the policy's general descriptions can be translated into their contribution. It is a common view among field staff that the necessary tools for implementing the environmental policy are lacking.

In general program officers are unaware that an EIA must form part of all Sida's contributions and the detailed requirements that are presented in the document "Guidelines for review of environmental impact assessments". However, even if unaware of the EIA requirement almost all are aware that environment is a mainstreaming issue and thus must be considered during the contribution preparation.

All interviewed POs understand that Sida must not get involved in contributions that may cause environmental degradation. However, this approach tends to be used also when administrating contributions without a direct impact on the environment. The analyses focus on identification of potential risks for environmental degradation when no considerable degradation potential is to be found and the result will be the ubiquitous statement "The contribution has no environmental impact".

A significant number of POs are not aware of the existence of the "Guidelines for review of environmental impact assessments". Among those who did know about and used the document, it was considered to be Sida's main document on how to work with environmental integration. Several POs mentioned various other documents as central and their main sources of inspiration and instruction, for example sector policies for private sector development, micro finance and the energy sector.

From the interviews it was clear that POs working in the field have a different view of the field working situation than POs working in Stockholm. In the field they have a practical approach to their work and see the production of contributions as their main target. The interests and priorities of the contribution owner and the cooperation country Government are central to them. They have a deeper understanding of the actual situation in the cooperation country and realize better which type of activities, and to what degree, that successfully could be implemented. Here a large gap between the HQ and the field has been noticed.

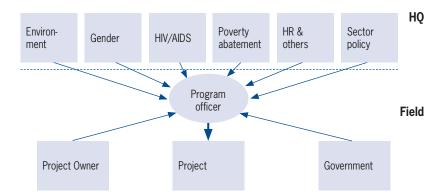
The question about which issues are to be considered mainstreaming issues vary among the POs. All agree that gender equality is a mainstreaming issue but not all include environment on the list. HIV/AIDS are not at all included at some embassies. Other issues that some embassies include on their list of mainstreaming issues include corruption, children's right, indigenous people's rights and human rights. Of the POs that were aware of the environment's status as a mainstreaming issue, very few could define what the mainstreaming implied.

It should be noted that the knowledge about the environmental policy and how to implement it was higher among expatriated Swedish personnel than among local employees. Also, local personnel do not use the helpdesk as much as expatriates and they are not always even aware of its existence. These observations indicate the necessity to direct more training towards the field offices.

Organization

The program officers see their position as one at the end of many pipes where policies and regulations from Sida HQ end up. They also have to consider opinions from the contribution owner and adjust to the priorities of the country Government. To summarize, they have a large number of requirements to fit into the same contribution and at the same time a pressure from the management to minimize the time spent administration. The situation is illustrated in the figure next page.

In this situation the PO needs distinctive direction on how to prioritize to manage tasks and internal support. However, according to the interviewed POs, there is a lack in both. There is no advice on how to prioritize and work with several mainstreaming issues and requirements connected to the sector or topic of the contribution. The local support function in the form of the focal point is very seldom contacted before the final assessment of the preparation documents in the local project committee.



The majority of the POs have never contacted the helpdesks. They do not see any reasons for involving them and have the understanding that contacting them only would delay the preparation process. Among the POs with experience of working with the helpdesks, some are happy with the support they have received, mainly POs administrating contributions with a large potential environmental impact. Others, mainly POs administrating contributions with small or minimal direct environmental impact, have the opinion that the reply from the helpdesk, mostly in form of a list with number of issues to be considered, only makes the administration more complicated.

A large majority of the POs think mainstreaming in general is difficult and believe the issues could be handled better. Many POs have mentioned that it is difficult for them to handle environmental issues due to their lack of education in the topic. We have noted during the discussions that most POs have difficulties to see the environmental policy as anything else than a rule to be applied to avoid environmentally harmful contributions. Thus, when a contribution obviously is not harmful, further analyzes are avoided.

POs think that the required extension of the EIA and the number of indicators required to be considered are too extensive. They feel that the EIA regulation needs to be better adapted to what is really of importance for the country or situation in question. The regulation must consider that practices are different and that reliable data may prove scarce. In such an environment it is not possible to handle a set of regulations that have its base in an ideal world where environment is the only prioritized subject. It is difficult to promote Swedish environmental requirements in cooperation countries if they are not considered relevant locally.

A majority of the POs have during the discussions mentioned that they do not see that Sida promotes environmental integration especially. There are no signals from central or local management, other than the flow of documents, that integration of environment is a central issue to Sida. The management seems to be more focused on the economical turnaround and there

is no impetus to carry out careful work on mainstreaming issues. There is no local follow-up or any local discussions, workshops, seminars or trainings on how to approach integration of mainstreaming issues.

2.1.2 The Managers

The local managers have the opinion that it is a very demanding task that the HQ prescribes when it comes to mainstreaming. They wish to have closer contacts with the HQ on the issue of how to implement the environmental policy and discuss its field applications.

None of the contacted managers have worked especially with promotion of environmental integration.

When it comes to organization, it should be noted that none of the interviewed managers had the same job description for the focal point.

2.1.3 Local Project Committee

According to the interviewed POs, the local project committee has the responsibility for the quality of mainstreaming issues and most POs seem to wait to put an effort into the mainstreaming until after the presentation of the contribution and following discussions in the committee.

However, according to the committee members that we interviewed, none of the visited local project committees has ever sent a contribution back for revision due to inadequate integration of environmental issues. Sometimes remarks have been given but there is never any follow-up that required improvements have been implemented.

In one of the visited countries there was no mention whatsoever about environmental mainstreaming or considerations in the task description for the local project committee.

That said, we do not discuss here at all the quality of the integration of environmental issues, only that there is a lack of a good quality system and that environmental mainstreaming is not a prioritized issue in the local project committee work.

2.1.4 Focal Point

It is important to note that the job descriptions of the focal point persons vary considerably. Some see it as their job to be a driving force for their mainstreaming issue and thus they organize seminars and education and seek to assist and discuss the issues with other POs. Some act as a link with focal points at other embassies, exchanging experiences and knowledge regionally and internationally. Others plainly see their role as limited to pass on documentation coming from the HQ and put the obligatory questions regarding their issue during local project committee presentations.

It was notable that the environmental focal points enjoyed less support from the HQ than for example the focal points working with gender equality. Generally, the environmental focal points did not have a background in natural sciences and they had not received any special education related to their position from Sida, facts that made it as difficult for them as for any other PO to grasp the complexity of environmental integration. Environmental focal points had a common view that the role of the focal point was not seen as central by the local management. Environmental focal points do not use the helpdesks and the "Guidelines for review of environmental impact assessments" to any larger extent than other POs.

2.1.5 Project Documentation

A summary of all the reviewed contribution folders shows that:

- In contributions with a high potential of direct environmental impact environmental analyses are present and well performed. This concerns mainly contributions related to the energy sector.
- In contributions with a high potential of indirect environmental impact there is mostly no correct environmental analysis present. The environmental issues are mostly, in the contributions reviewed, dispatched with a short statement declaring that the contribution does not have any environmental impact. For example, environmental considerations were found to be absent in large contributions in private sector development and industrial and tourism development. In all these cases, a potential for negative indirect impact existed.
- In contributions where there is a large potential to include environmental issues, for example capacity building or awareness raising, these are, in the contributions reviewed, not taken care of. Environmental issues are dispatched as described above. Examples of this include the education sector where we have noted that possibilities to introduce environmental considerations in curricula at different levels have been overlooked.
- In contributions with no direct or indirect environmental impact and no obvious potential to include environmental issues in a natural way, there is often no mention of environmental mainstreaming or only the ubiquitous statement declaring that the contribution does not have any environmental impact.

To present exactly what type of environmental analyses that have been presented in each reviewed document would be too tedious, but a focus on compliance with the EIA requirement gives an interesting result. The table next page clearly presents that the compliance is very low, especially for contributions in "soft" sectors like HR/Demo, health and social sectors.

Area/ Document	Proposal, EIA compliance				Assessment Memo, EIA compliance			
	Number of projects studied	No state- ment at all	Com- plete EIA	Short State- ment	Number of projects studied	No state- ment at all	Com- plete EIA	Short State- ment
Natural Resources	14	1	4	9	22	7	2	13
HR/Demo	15	12	0	3	18	13	1	4
Social	16	14	0	2	15	12	1	2
Infra/Priv Sect Dev	13	10	1	2	12	8	2	2
Health	1	1	0	0	8	0	0	8
Total	59	38	5	16	75	40	6	29

When an EIA is present it has relatively often not been performed as part of the preparation phase, but rather during the inception phase. This is understandable from a practical point of view but reprehensible according to the regulation as the EIA should be used as a basis for the decision to give support or not to a specific contribution and influence the contribution design to be more sustainable.

2.2 Country Cooperation Unit

It is not possible to cover fully the opinions of the Country Cooperation Unit as the organizations are extensive and complex. We met with administrators responsible for Sweden and present their opinions here. However, we cannot guarantee that their views represent the complete view of their organizations.

In general the organization representatives were not aware of Sida's environmental policy and its main features. They were aware of that Sweden is concerned about not causing negative environmental impact, but the knowledge was limited to a "no harm"-thinking.

For the cooperation units, mainstreaming in general is difficult to grasp. The idea of applying environmental analyses on contributions with no obvious environmental impact was not well understood. However, they accept all requirements from the international donors.

A fact that clearly reflects in the opinions of the country cooperation units is that environment in general is not in the same focus as earlier. In Bolivia, for example, it has almost disappeared from the daily political arena.

2.3 International Donor Coordination Body

In larger contributions supported by a group of international donors normally one donor has a lead function and sets the priorities of the contribution. The other donors do not, as we have discovered, stress environmental integration to the same degree (i.e. as much) as Sida does but limit themselves to a "no harm"-view of the contributions. Thus, when Sida supports larger contributions as one of a group of donors, the environmental priorities are generally lost.

2.4 Swedish NGOs

The interviewed Swedish NGOs all consider that they have considerable freedom to set up their own policies without paying too much concern to Sida's policies even though Sida is their main source of finance. Their own policies do differ considerably from Sida's, especially when it comes to environmental mainstreaming.

Responsible NGO personnel claim that policy issues, such as mainstreaming, rarely is a topic brought up during otherwise frequent discussions with Sida. The awareness of Sida's environmental policy and its implications was found to be low and they normally did not search for information among Sida's published documents.

The NGOs work near the contributions and have adopted their views and opinions to the reality in which they work. Thus, their opinions on mainstreaming lie close to these of the cooperation country, i.e. they do not see the benefits of ever present environmental analyzes in contributions and activities without direct environmental impact. They also mention that it is most difficult to get the contribution owner's positive response to analyzes, like mainstreaming, that lie outside the main objectives.

2.5 Contribution Owners

The contribution owners interviewed were often not aware about Sida's environmental policy and integration approach and the matter had not been brought up during the discussion with POs. It should be noted that we deliberately selected to interview contribution owners for contributions that did not have any direct environmental impact but with obvious possibilities to integrate environmental issues into the objectives and tasks. As mentioned already, the concept of mainstreaming is relatively new in Sida's cooperation countries and it is obviously difficult to understand and apply.

3. Summaries, Explanations and Conclusions

3.1 The Implementation Chain

The environmental policy is formulated in Stockholm, as is the policy's implementation strategy. The implementation of the policy largely takes place in the field. It has become obvious during the evaluation that there is a considerable gap between the ideas and intensions of the policy and its effects in Stockholm and the capacity to do the implementation in the field. The field does not understand how to implement the policy, the targets are not possible to grasp and the concrete journey from policy to implementation does not exist. It is difficult for POs in general to see how the policy can be applied in a specific contribution. There is a lack of tools and guidelines that can translate non-specific general and global ideas into definite applications adopted to the local situation and reality. The various tools that do exist, guidelines, helpdesks and other documents, are either not specific enough to be of help (other documents) or not adapted to the local reality and too focused on EIA (guidelines and helpdesks).

The conclusion is that Sida has tried to introduce an extensive and complex system for integration of environmental issues without working sufficiently with the means and methods for its implementation.

3.2 Policy Awareness

The relatively low awareness of the environmental policy, its implementation regulation and mainstreaming in general influences most negatively the outcome of the integration of environmental issues.

The shallow policy awareness contradicts the efforts to work with environment in an integrated manner. The "no harm" approach, focusing on physical negative impacts, leads to the fact that environment is handled as a separate subject and not as a mainstreaming issue. The focus on physical effects can for many projects lead to misleading priorities, for example "extra commuter traffic", "garbage thrown away from offices" or other small scale environmental effects that are results of economic development rather than specifically attached to the project and thus not a relevant part of an EIA. Major possibilities to work with increased environmental awareness or introduction of environmental issues in line with the United Nations statement that "clean environment is a human right" are, on the other hand, omitted.

The main reason behind the low awareness is not lack of informative documents, but rather the abundance of documents and the fact that the documents are not structured in a way that makes it easy for the PO to identify the correct document. The documents are also too extensive and bring up many issues which make it difficult to grasp the essentials. The POs have responsibility for implementation of a large number of policies and regulations and need the rest of the organization to make the task as easy as possible.

The conclusion is that POs in general need more support in breaking down the policy into targets and activities that can be understood and applied at contribution implementation level without specialist competence in environmental sciences.

3.3 EIA Regulation

For an outsider, and for Sida's own personnel in general, it appears that Sida's main strategy for implementation of the environmental policy is the EIA regulation, i.e. the rule that all Sida contributions must contain an EIA. The rule says that in exceptional cases the EIA can be limited to a short statement, but the normal case requires a substantially larger input. The formulations and assistance given in the "Guidelines for review of environmental impact assessments" are heavily focused on direct environmental impact. Integration of environmental issues in other types of contributions is shallow, does not give the user much support, and disappears among the direct impact related advice.

When reading the standard environmental assessments in contribution documentation in the field it is obvious that most of them have been made using common sense rather than checklists and helpdesks, a conclusion that is supported by the interviews. The POs are not using available help and tools as these are considered too cumbersome and extensive. However, it should be noted that many program officers recognize that there could have been more to say about environmental integration than what was actually done when confronted with possibilities during a discussion.

Thus it must be concluded that the high level of ambition in the EIA regulation backfires and leads to a situation where POs evade the regulation and perform their own integration procedure, naturally differing in quality and extension with every PO.

When interviewing POs about the situation in the cooperation country and discussing competence of local environmental governmental environmental and statistical agencies and institutions it stands out that it is impossible to implement the EIA regulation as defined as all the necessary background information about the present situation does not exist. The conclusion is that the EIA regulation must be better adapted to the actual situation in developing economies.

We did find some cases where the EIA regulation was carefully implemented. However, these cases only created a picture of misdirected efforts. When the EIA regulation was implemented almost to perfection for a bus terminal in Africa and construction of village latrines in Bolivia, the final products have an air of absurdity. In Africa, the EIA with all its descriptions of requirements creates the feeling of an aquarium, a product that has to live separated from the world in which it exists. It is clear that it will never be possible to implement the construction of the bus terminal maintaining all these requirements.

In Bolivia, there was an extensive document dealing with the environmental impact of constructing new latrines in a number of villages, simple and small constructions of concrete and wood. The EIA went into an almost absurd level of detail on the environmental consequences of these constructions.

It is obvious that these EIAs themselves must have cost a considerable effort to produce and it should be questioned if these resources have benefited the environmental integration in the best way.

Our conclusion from the field visits is that the ambition in the EIA regulation must be more adapted to the reality in developing economies and consider the effort compliance with the regulation will require.

3.4 Organization

From the field perspective there are several measures related to the organization that would facilitate and improve the environmental integration.

Communication

A main conclusion from the interviews with field POs was that communication between the HQ and the embassies, especially the delegated ones, must be improved. Presently the communication channel, as perceived by the field POs, is documents sent out through the email. This is a one-way communication and the field does not feel that there is any possibility to get explanations, interpretations or implementation advice from the HQ on policies and regulations. In two of the visited embassies the managers had explicitly asked the HQ to provide assistance in how to work with the environmental policy but the HQ could not meet the petitions.

Organization of mainstreaming

To be able to produce high-quality work in an efficient manner the responsibilities and mainstreaming specific job descriptions must be clear between the HQ and the field and within the field group. This is presently not the case according to our experiences from the field visits.

In the field the following levels and functions are involved and have responsibilities connected to mainstreaming:

The PO

Responsible for integration of mainstreaming issues in contributions.
 All interviewed POs agree on this.

The Focal Point

- Responsible for a specific mainstreaming issue to be brought up during local project committee presentations. All focal points agree on this.
- Responsible for giving support in a specific mainstreaming issue to other POs during preparation of a new contribution. Few focal points agree on this.

 Develop and promote integration of a specific mainstreaming issue locally. Some focal points agree on this.

The Local Project Committee (LPC)

 Review and approve that all mainstreaming issues are integrated appropriately in new contributions. One LPC did not mention mainstreaming of environmental issues in its task description, but the interviews testified that all LPCs operated accordingly.

The Manager

- Organize and instigate how integration of mainstreaming issues is performed. All managers agree to this responsibility, but none is paying much attention to it.
- Follow up on the quality of mainstreaming work. All managers agree, but none is doing it.

The conclusion from the field visits is that there is a need to define better and more clearly the responsibilities and job descriptions for all involved in the integration of mainstreaming issues. The present situation definitely contributes to the low level of integration of environmental issues.

Learning Organization

The best way to improve the quality of a process is to constantly learn from earlier similar experiences. Sida annually processes a large number of contributions internationally but each time a PO begins to integrate environmental issues in a new contribution he/she is limited to use his/her own experiences as support. Rarely experiences from other POs in the same embassy are used and never, according to our interviews, experiences from other countries.

There is no exchange of experiences within the embassies, no seminars and no work-shops discussing mainstreaming. Neither on a regional nor international level is there any exchange on how to integrate environmental issues in new contributions, in the different sectors, in different types of support, or ideas on how to implement the environmental policy in general.

Our conclusion is that the quality of the integration of environmental issues has a lot to gain from improving the way Sida's experiences from earlier contributions are taken care of.

A global network for exchange of experiences of policy implementation should increase the efficiency and quality of Sida's integration of environmental issues considerably. The easiest manner to get the network operating is to have it organized and managed by the focal points.

Prioritization of integration

To comply with all of Sida's mainstreaming policies, considerable resources must be set aside in the form of PO time. Sida's management at HQ must consider the cost in the form of administration time when setting up the rules, and the local management must set aside time for mainstreaming. A

problem today is that the management is not encouraging time being spent on integration of mainstreaming issues. POs feel that the quantitative target is given considerably higher prioritization then the qualitative goal in form of compliance with policies.

The low support from management to work with environmental integration naturally inflicts severely on the overall quality of the integration. POs make their prioritizations based on the signals from the management. The management must show that it considers integration to be of importance, as large as is given in the documentation.

Follow-up

The follow-up of integration of mainstreaming issues is irregular and almost non-existent, a fact that naturally inflicts severely on the quality of the mainstreaming of environmental issues. Currently it is largely up to the individual PO to decide the quality of the work, and issues that are not followed up naturally achieve a low status by POs and are considered as less important.

Integration of mainstreaming issues must be followed-up on quantity as well as on quality, and not only within the organization but also later in ongoing contributions. The follow-up constitutes an important part of the learning organization process.

Sida's environmental management system should be extended to include follow-up of integration of environmental and other mainstreaming issues.

3.5 Capacity Building

The capacity building in integration of environmental issues is a central issue in identifying reasons for the current weak performance of environmental integration. POs complain that they have insufficient understanding of environmental subjects to be able to perform the integration well. Most POs, but not all, have received some kind of capacity training in environmental integration. However, it seems that earlier generations of POs received a two-day course while most of the newer ones and locally employed have received only a half day. Also, the focus of the training is on EIA, not on integration of environmental issues in a broader perspective. As the EIA-regulation only represents a part of the environmental mainstreaming strategy, this is a large deficiency.

In the light of the insufficient understanding it might seem natural to draw the conclusion that more capacity building is in order. However, as long as the EIA regulation is so demanding and the environmental policy not broken down in locally adapted targets, it will be too difficult for a PO without an academic title in natural sciences or engineering to comply whith it. Thus, giving more short trainings to POs in general will not be the solution. The POs must be helped through a policy broken down into pieces easier to digest and through better support in their work.

More capacity building is needed, but not in the form of general training of POs. A group that would be beneficial to train is the focal points. As the size of the group is limited the training can be more extensive and the achievements more substantial. The focal point, being involved in all contribution preparations will be able to make use of the training rapidly and can better assimilate the training than what an average PO can, preparing only a few contributions per year.

Training the managers would also positively affect the integration of environmental issues. Managers need to be more aware of the benefits of main-streaming to promote it better in their own organizations. They also need capacity building in understanding how the integration is to be implemented practically.

Contribution owners do not, as mentioned, understand the concept of mainstreaming and do not see its benefits. A higher degree of awareness and understanding among this group is of major importance.

Another group that affects largely on some contributions are implementation facilitators like international consultants and experts. These are normally not aware of Sida's mainstreaming and integration requirements and do not understand them. A capacity building package could be developed especially for this group.

3.6 Ambience for Environmental Mainstreaming

The Swedish policies are widely recognized during discussions but during actual implementations mostly disregarded. The awareness has not yet reached the point where it is possible to grasp the positive effects of integrating environmental (and other mainstreaming) issues. It is natural to perform an EIAs for any project with an obvious environmental impact, but mainstreaming of environmental issues in all contributions must yet be regarded as something unfamiliar.

Our conclusion is that it is difficult for Sida to achieve integration of environmental issues if these values are not shared by the cooperation partner. The mainstreaming could gain in quality through communication with concerned authorities in the cooperation countries and convince them about the benefits.

4. Summary of the Field Perspective

The number of findings, explanations and conclusions in the evaluation is large. To give a listing of what is working well and what is not in the field we present the following sections: "Well working components in Sida's work with environmental integration" and "Weak components in Sida's work with environmental integration". To somehow weight the findings we have put together the "Listing of major causes and conclusions". All these sections are

extremely compact and only intended as a summary for readers familiar with the contents of the complete report.

Strong components in Sida's work with environmental integration

- Sida has implemented a strong feeling in the organization that contributions causing environmental degradation must be avoided.
- In contributions with potential direct environmental impact, Sida's organization largely complies with the environmental policy regulation.
- Sida has published a number of well written documents stating the importance of environmental integration and the relation between environmental degradation and poverty, health, conflict and economic development.
- Sida has put up a functioning organization for assisting POs with EIA and SEA, working close to the instructions given in Sida's respective guidelines.

Weak components in Sida's work with environmental integration

- In contributions with only indirect environmental impact or no environmental impact that is, the large majority of the contributions, Sida's organization does not manage to comply with the intentions of the environmental policy. Environmental issues are not integrated but rather incorporated as a separate issue.
- The environmental analysis is focused on verifying that the contribution does not bring about any negative environmental impacts. The practice could be defined as a "no harm"-approach. The wider context of environmental integration as described in Sida's documents is not understood by their own organization and not by contribution owners and representatives for the cooperation countries. Possibilities to achieve positive environmental effects of development activities are mostly missed out.
- For support that goes through other donors, NGOs, programs or budget support Sida has not managed to ensure compliance with its environmental policy.
- Sida's organization, documentation and policy implementation support functions focus too much on EIA, which is only part of the environmental policy implementation strategy.

Listing of major causes and conclusions

There are many reasons, explanations and causes to the present situation, in the list below the principal ones, from the perspective of the field, are summarized.

 Sida has created an overall policy but not broken it down into objectives possible to apply on a contribution level. The concrete journey towards

- the stipulated goal is not defined. POs in general do not understand how to apply the environmental policy.
- The managers, locally at the delegated embassies, do not prioritize and promote integration of mainstreaming issues.
- Sida is not a learning organization when it comes to integration of environmental issues. Experiences gained during one contribution preparation process cannot be used by another PO preparing a similar contribution, there is no networking and no mainstreaming seminars or workshops are arranged.
- There is no regular follow-up of integration of environmental issues at the delegated embassies, not of policy implementation, not of compliance with the EIA-regulation and not of environmental concerns in the contributions.
- Sida's heavy focus on promoting EIA and its ambitious EIA regulation in practice counteracts integration of environmental issues as the environmental policy is understood by many POs as consisting only of EIA.
- Contribution owners and cooperation country partners do not always understand the idea and benefits of integration of mainstreaming issues.
 They accept it in all their documents when required by Sida, but in their implementation they avoid it.

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Integrating the Environment?

Environmental Considerations in Sida's Work

Sida's Environmental Management System establishes that environmental aspects shall be considered in all of the organisation's lines of work, and that this is the responsibility of the entire agency.

This study evaluates the extent to which Sida has managed to turn this policy into actual practice. It does so by drawing on an extensive material from interviews with Sida staff and partners, documents from the organisation, project documentation, and visits to six of its field offices.

The evaluation notes several positive traits, but also a number of obstacles to integrating environmental concerns in Sida's work.

The latter include the amount of different policies and goals present at Sida, lack of mechanisms for follow-up and monitoring of progress, and unclear responsibilities for environmental integration.

The evaluators conclude by suggesting a number of measures that can enhance the integration of environmental concerns in Sida's work.



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