



Netherlands Commission for
Environmental Assessment

Conclusions: Organisational Analysis of RDB's EIA Unit

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Advice of the Secretariat

To RDB

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Subject **Conclusions: Organisational Analysis of RDB's EIA Unit**

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Conclusions: Organisational Analysis of RDB's EIA unit

1. Introduction

The Rwanda Development Board (RDB) and the Netherlands Commission for Environmental Assessment (NCEA) have signed a two-year Memorandum of Cooperation on Environmental Impact Assessment. In the framework of this cooperation, the NCEA provides capacity building and technical advice to the EIA team at RDB. Although the key focus of the co-operation is technical, the EIA team is also interested in the question of how to organise its work as effectively as possible. For this reason, it has asked the NCEA to carry out an organisational assessment and come up with recommendations for how to better prepare the EIA team for the future.

In November 2016 the data for this organisational analysis was collected by the NCEA. It was gathered together through:

- Semi-structured interviews with different target groups: the EIA team itself, its management, other departments within RDB, and two partner organisations with which the EIA team regularly cooperates or deals.
- Questionnaires for the EIA team on organisational and individual capacities required to perform the EIA related tasks and one looking into team functioning.
- Statistics study.

Analysis of the information was based on key themes emerging from the data. Below the main conclusions are presented.

2. Main conclusion & recommendations

Main findings

Although different groups of stakeholders were interviewed, the overall picture that emerges is consistent:

- Rwanda is aiming for economic development, using the principles of green growth. Many businesses in Rwanda rely on natural resources and sustainable use of these resources is therefore not only important for environmental and social welfare, but also from a business perspective. EIA is the main tool available to the Rwandan government to ensure environmental and social considerations are taken into account in decision making. All respondents seem to agree on this role of EIA, and find it important.

- RDB's main objective is to attract and facilitate investments. They are successful in this endeavour, the recently published Doing Business report 2016 demonstrates that the country is up by 6 points compared to 2015, and ranks 2nd in Africa.
- Given the above, due to the growing number of investment projects, the number of EIA is equally growing. Statistics show that when RDB started administering EIA in 2009, 90 EIA certificates were issued, growing from 248 in 2012 to 334 in November 2016. This increase is predicted to continue in the coming years.
- Yet, since the start of the EIA unit in 2009, the capacity of the team has not increased accordingly. The number of staff has remained the same and no structural investment has been made in development of skills and expertise. All respondents express their concern that the team is currently already overloaded, and will not be able to meet future demand.

Across the board, the respondents consider it necessary and worthwhile to invest in EIA and in the quality of the procedure. In table 1, a summary of main findings is presented by means of a SWOT analysis showing strengths and weaknesses (internal to the organisation) and opportunities and threats (external to the organisation).

Table 1: SWOT analysis of the RDB EIA team	
<p><i>Strengths (internal)</i></p> <ul style="list-style-type: none"> • Strong sense of 'team', open atmosphere, helping each other out • Dedicated leadership • Client friendly • Good set-up in terms of organisational structure, information system and resources for tasks • Flexible when required: when complex projects require more study and time, this is taken 	<p><i>Weaknesses (internal)</i></p> <ul style="list-style-type: none"> • Small team with high work load • Not all types of expertise needed are available within team and limited options to engage external expertise • Little investment in development and maintenance of skills and expertise • Little anticipation of new developments requiring new expertise • High work load combined with focus on speed may compromise quality
<p><i>Opportunities (external)</i></p> <ul style="list-style-type: none"> • Government policy of Green Growth gives extra importance to mainstreaming of environmental and social considerations in decision making. EIA is the main instrument to ensure this • Government policy of decentralization provides opportunities to shift part of RDB's workload to Districts • International cooperation, such as with the NCEA, giving access to new ways of working 	<p><i>Threats (external)</i></p> <ul style="list-style-type: none"> • Increasing number of EIAs in relation to team capacity • Division of mandate on EIA between RDB (procedure) and REMA (awareness raising, monitoring) not optimised for EIA effectiveness

Main Recommendations

To anticipate future developments, the RDB will need to invest in its capacity and ways of working in relation to EIA. This can be done in different ways. Below, the NCEA presents a set of recommendations and different options on how to work on them. The NCEA advises the RDB to consider the different options and see which (combinations of) options would fit best. The NCEA remains available for assistance in selecting the most appropriate options and to see how they could be implemented, possibly first through the MoU between the RDB and the NCEA, and ultimately more structurally as part of the EIA work at RDB.

Recommendation: reduce the workload per person

In order to maintain quality, investments need to be made. Workload per person will need to be reduced. This can be achieved in different ways. Options include:

- Increase the number of staff in the EIA team to at least 8–10 people;
- Reduce the number of EIAs to be handled by the EIA team
 - by either revising the number of projects that require full EIA (through an adaptation of the screening list and criteria),
 - or by decentralisation of EIA tasks to districts (possibly in combination with a tiered approach to assessment, where there is differentiation between complex and more straight-forward EIAs).

Recommendation: invest in expertise

Again in order to maintain quality and keep up with developments in society and industry, investments need to be made in expertise. This could be three-fold:

- Invest in the skills and expertise of the EIA team through a consistent and structural capacity development programme/training programme;
- Create access to short-term, ad-hoc external expertise that can be engaged, even for a few hours, for a specific project (formulation of ToR and/or review of EIA report);
- Enhance in-house expertise through the assignment of similar projects to the same staff, so that he/she builds up expertise in a certain field and can monitor consistency in the team's outputs in this field.

Recommendation: streamline work processes

Workload can be handled more efficiently by developing consistent ways of working, as well as formats and checklists. Currently, staff work alone and use their own approaches. Specific options to consider:

- Develop fixed formats for ToR and review reports, that can be adjusted to the project (Note that the fixed formats also carry a risk that people will “go through the motions” rather than approach each case afresh. This needs to be considered before any formats are developed).
- Develop ways of working (procedure) that will take all staff consistently through a set of steps;
- Invest in quality control through peer-review, ultimately also enhancing efficiency;
- Invest in better, more streamlined scoping, resulting in better ToRs for the EIA studies, and leading to better and more consistent review of the EIA reports.

To come to more precise recommendations on what type of checklists and ways of working to adopt, the NCEA suggests to make an analysis of the technical documents made available for this report by the RDB, and to study them in detail, to get a detailed impression of the strengths and weaknesses of these documents. The NCEA could offer to initiate this analysis to facilitate this discussion with RDB.

Recommendation: engage in a dialogue with REMA on awareness raising and monitoring

Without proper awareness raising Rwandan citizens will not know why and how to do EIA. Without proper monitoring and compliance, recommendations coming out of the EIA and conditions to the environmental permit will not be applied in practice. This renders the instrument much less effective. The mandate of these two activities lies with REMA, but due to the work of RDB in which they directly engage with investors, local governments and other relevant stakeholders, it seems only logical and efficient that they would also play an active role in awareness raising and monitoring. The NCEA recommends that the two parties sit together and engage in a dialogue on how best to make use of these practical advantages and how to best organise their complimentary work.