

Final Advisory Review of the Strategic
Environmental Assessment for the Ghana
Poverty Reduction Strategy – phase II

Ghana

8 October 2004

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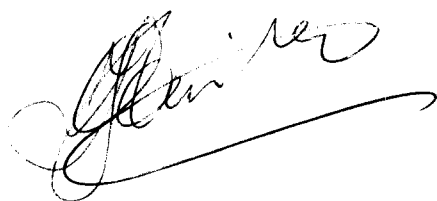
Final Advisory Review of the Strategic
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Poverty Reduction Strategy – phase II

Ghana

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Utrecht, 8 October 2004

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APPENDICES

1. Terms of Reference Final Review SEA of GPRS – phase II (Final version dated 31 August 2004)
2. List of documents and materials
3. Working programme of NCEIA (site visit by the working group) 15-18 August 2004

1. BACKGROUND

In April 2002 the Royal Netherlands Embassy (RNE) in Accra, Ghana invited the Netherlands Commission for EIA (NCEIA) to assist the Environmental Protection Agency (EPA) in developing the framework and guidelines for a Strategic Environmental Assessment (SEA) for the Ghana Poverty Reduction Strategy (GPRS). Advisory guidelines were published in July 2002 for the SEA study, the SEA process and for institutional arrangements and implementation modalities.

Early 2003 the RNE invited the NCEIA to assist EPA in starting up the SEA. This resulted in undertaking a pilot SEA on the 2003 revision of the GPRS. The full SEA (SEA phase II) subsequently started in May 2003. The proposal for phase II adopted both a top-down and bottom-up approach, with equal emphasis being given to the refinement of policies and budgets at national level, and the practice of implementing the GPRS through District Development Plans. The SEA had the ambitious target of interacting with every Ministry, Department and Agency (MDA) and every district in Ghana within a one-year programme, and building capacity accordingly at all levels.

On the initiative of the NCEIA, as part of its monitoring function in the SEA process, early July 2003, a meeting was held in London between NCEIA and the international SEA consultants to discuss approach, progress and next stages in the work.

In October 2003, a mid-term review mission took place in Ghana by the NCEIA as foreseen in the Activity Appraisal Document of the RNE. The mid-term review mission formulated advice towards implementing agencies with a special focus on quality and progress of the SEA process with attention given to (1) transparency, (2) stakeholder involvement, and (3) time schedule in relation to the GPRS review/amendment calendar. Contents and institutional arrangements were also reviewed, including specific recommendations for improvement. Additional chapters were included on management issues, on effectiveness/impacts and suggestions were given for short term and long term follow-up.

Subsequently, the NCEIA has provided advice on several drafts of the SEA report, informally in January 2004 and formally in March 2004.

In July 2004, it was agreed by the RNE and EPA to invite the NCEIA to perform a final review of SEA phase II, which is ending on 31 August 2004. Therefore a mission was scheduled for a visit to Ghana between 15-18 August 2004.

Terms of Reference for this Final review are provided in Appendix 1 and can be summarised as follows:

- Assessment of quality and process and results of SEA phases I and II.
- Identification of the most important measures to be taken in order to complete project design, enhance implementation procedures, strategy and methodology of SEA phase III.

- Brief view on perception of the mission on feasibility of SEA phase III, including a listing of the main risks threatening an effective and sustainable outcome of phase III.

The findings presented below are based on:

- A review of the final SEA report (executive summary, process report and content report) and additional documentation provided by e-mail on 11 August 2004. Appendix 2 lists the documents and materials reviewed.
- Interviews held with RNE, EPA and NDPC, with 6 donor organisations, and with 8 MDA's and 2 NGO's. Ultimately, a meeting was held with the SEA team and their consultant. Appendix 3 gives more details on the working programme of the NCEIA. Unfortunately, time did not allow for meeting with (a selection of) the districts.

2. REVIEW FINDINGS IN TERMS OF PROCESS

2.1 Overview of the SEA process

Following the scoping mission by NCEIA in June 2002, the SEA process started by a pilot phase which ran from January - March 2003. This pilot phase I culminated in the Ho workshop in February 2003. During this workshop, it was decided to proceed with the SEA project and to cover every District of Ghana (for SEA of District plans) and every MDA (for involvement in SEA of the GPRS).

From then on, during the full SEA (phase II), two different SEA process trajectories can be distinguished, with some linkages established between the two at the end of phase II.

<i>1. SEA of GPRS involving MDA's</i>	<i>2. SEA at District level involving local authorities</i>
<ul style="list-style-type: none"> • April 2003: review of GPRS document • Jan-May 2003: screening / scoping of GPRS • October 2003: review of MDA policy statements within GPRS • onwards: SEA consultations with MDAs • February 2004: workshop with national NGOs • May 2004: Ministerial SEA conference 	<ul style="list-style-type: none"> • June 2003: training workshop • July 2003: regional briefing workshops • onwards: District level SEA • September 2003: follow-up visits • November 2003: regional response meetings • onwards: review of completed District appraisal reports

SEA phase II would end by 30 April 2004 but was extended to 31 August 2004 as not all planned activities had been completed by then. A full draft report of SEA phase II was available by June 2004.

2.2 Participation, transparency and communication

Review questions posed by the NCEIA can be summarised as: 'How did you perceive your participation in the SEA process?', 'Were you informed in time?', 'Was your participation adequate?', 'Was the process transparent in terms of the objectives, access to reports and information supply?' and finally: 'What did you think of the communication between your organisation and the SEA team?'

Findings can be summarised as follows:

- The general opinion is that the process has been participatory and transparent.
 - Participation by 27 (all) MDAs, 108 (out of 110) Districts and 6 (out of about 25 invited) NGOs.
 - Most MDAs responded from the beginning, some MDAs have responded and joined late but are now 'on board' also.
 - Some NGOs were invited in the October 2003 meetings, but many more were invited for a meeting in February 2004.
 - Several private sector organisations were invited (e.g. Private Enterprise Foundation, Association of Ghana Industries, Chamber of Commerce, Chamber of Mines), but these did not respond at all.
 - Workshops and meetings were well organised, objectives were clear, documents were available in time, comments have been incorporated.
 - Communication with the EPA focal point of the SEA team was adequate (by telephone and through letter / e-mail correspondence).
 - At local level there is need to involve grass-root organisations and Community Based Organisations.
 - There is demand for training and capacity building on SEA within MDAs. Policy makers (PPME-units) would be important target groups.
- The NCEIA concludes that the SEA process was well planned and managed, coverage of the public sector has been very good, but interaction with civil society (NGOs, CBO's and traditional authorities) and private sector should be strengthened, both at national and at decentralised (District) level. Overall transparency and communication were adequate.

2.3 Progress and timing

During its visit in August 2004, it became clear to the NCEIA review team that the original set-up of the execution of the SEA in relation to the GPRS calendar was not realistic. Both the SEA team and the NCEIA had been operating under the impression that the GPRS was a so-called 'rolling (open) document' – to be updated annually - and therefore, SEA results had to be available before the GPRS would be updated. SEA results would also serve as inputs for the budget reviews (Medium Term Expenditure Framework). However, it soon became clear that the current GPRS document is still the 2002 version for the period 2003-2005. 'Updates' have been made, but these

are annual progress reports documenting progress in the execution of the GPRS.

On the one hand, it is rather unfortunate that this misunderstanding became apparent only recently. On the other hand, it offers opportunities, because the SEA results are available in time for the update of the GPRS (2003-2005) to amend and update the GPRS (2006-2008). Activities planned for this update have been scheduled to start in the second half of August 2004 and end in March 2005 (GPRS) and June 2005 (budget). Cross-sectoral planning groups will be formed based on the original five identified thematic areas as expressed in the GPRS. A sixth group will also be formed to handle MDG's, NEPAD and new emerging initiatives. A draft manual has been produced by the SEA team to assist in this process of updating the GPRS

- The NCEIA recommends to give highest priority to warranting that SEA results are integrated in the GPRS 2006-2008 in a proactive way. This is will be the 'proof of the pudding' of work undertaken so far.

2.4 Project management

The SEA team noted that during SEA Phase II overall, considerable time and resources were required for solving financial problems, adjustments of proposals, communication with the donor and rescheduling of plans. This has affected the efficiency of the project operations.

The Steering Committee was supposed to meet monthly, but during SEA Phase II has met 6 times only. Several meetings had to be cancelled because of members not being available.

- The NCEIA suggests that the Steering Committee reassembles at the end of August 2004 to discuss this final review report, evaluate its own performance (also considering earlier recommendations of the Mid Term Review: issues are membership, role and frequency of venue), and propose the structure it wants to adopt for phase III.

3. REVIEW FINDINGS IN TERMS OF CONTENTS

3.1 Overview of outputs

The following outputs have been extracted from the SEA phase II report, and updated by the NCEIA. This list is included for overview purposes and is probably not fully complete.

Reports:

- Scoping Report, June 2003
- Review of the GPRS (First stage analysis), July 2003
- Review of the GPRS (Second stage analysis), September 2003

- 110 District Assembly Reports describing the outcome of their Sustainability Appraisals, November 2003
- Draft Guidelines for MDAs on Incorporating SEA in MTDPs and MTEF, June 2003
- Refine and Issue Final Guidelines for MDAs, June 2004
- Advisory notes to MDAs, August 2004
- SEA Report of Findings (Preliminary Draft), January 2004
- SEA Report of Findings (Second Draft), February 2004
- SEA Report of Findings (Final Draft), March 2004

Guidance & Capacity Building

- Training for 20 Regional Directors of EPA & NDPC, June 2003
- Training in Sustainability Appraisal for 428 District Officers, July 2003
- Training in SEA for SEA team and 6 senior staff of Government MDAs, September 2003
- MDA Policy review meetings, October 2003
- NGOs, CBOs and Academia Review, February 2004

Advice on Governance and Institutional Reform

- Preliminary Assessment (part of project document SEA phase II), April 2003

Handbooks, frameworks and other training or SEA materials

- Handbook on Sustainable Appraisal for Districts, July 2003
- SEA manual, August 2004
- Matrices and checklists for assessment of PPP's

Dissemination of Findings

- Presentation at IAIA, April 2004
- National Conference, May 2004

3.2 Achievement of planned outputs and gaps

Comparing the anticipated outputs and real achievements, a number of gaps can be observed, as follows:

- The GPRS was not amended, due to the fact that GPRS review did not take place.
 - Focused pilot SEAs for selected Districts were not undertaken, due to absence of a challenge fund and time constraints following late release of funds in 2003 (as agreed by the Steering Committee in December 2003).
 - Focused pilot SEAs for selected sectors were not undertaken, for the same reasons as stated above.
 - Regional conferences (2) for feed-back of District level results (involving District Assembly, senior staff, MPs, NGOs and CBOs) were not organised, as these activities were not approved by the RNE within a revised budget of SEA phase II.
 - Costing of proposed policy recommendations was not undertaken, due to the fact that there was no sound basis to do this within the GPRS.
 - Monitoring of SEA effects and impacts was not undertaken, due to the fact that this had not been proposed as being part of SEA phase II.
 - An institutional analysis has been undertaken (see appendix 3), but not according to the guidelines as initially proposed by the NCEIA and not as an integral part of the SEA phase II. In fact, it is more like an appraisal of the current SEA process. As a result no adequate proposals for institutional strengthening and institutional rooting of the SEA process have been formulated.
 - GIS activities at District level cover the demand side (activities proposed by Districts) but these are not matched with the supply side (of natural resources and environmental problems), due to lack of reliable data and time constraints.
- Looking at the expected outputs and their quality, the NCEIA concludes that in terms of capacity building (by training and on-the-job involvement) the SEA process has largely met expectations. In terms of manuals, frameworks and tools, there is an impressive amount of materials that is actively being used. In terms of concrete results (advisory notes, District reports, MDA guidelines, etc.) the NCEIA observes that there are many useful outputs, and notes that these outputs are mainly based on qualitative expert judgements. Additional justification and supportive evidence would probably have made the conclusions more objective and convincing to decision-makers.

3.3 Pending issues phase II

What still needs to be done, according to the NCEIA, to finalise SEA phase II, can be summarised as follows:

- Organise and hold regional conferences for feed-back of District level results.
- Propose packages of inter-thematic pro-poor and pro-environment programmes, as input and for inspiration in cross-sectoral planning groups for the GPRS update.

- Propose a monitoring system with indicators for measuring effects and uptake of SEA products and services, and establish a baseline (see also section 4.3).
 - Work out an easily accessible executive summary of the SEA phase II report based on already available drafts and ideas for an ‘SEA in pictures’. Contracting an external editor could be considered.
 - Ensure that communiqué resulting from Ministerial Conference is signed and is distributed widely.
 - Include a reporting on the Ministerial Conference in the SEA phase II report.
- The NCEIA recommends to undertake these pending issues in the transition period between the phases II and III.

4. EFFECTIVENESS / UPTAKE / IMPACTS

4.1 General impression

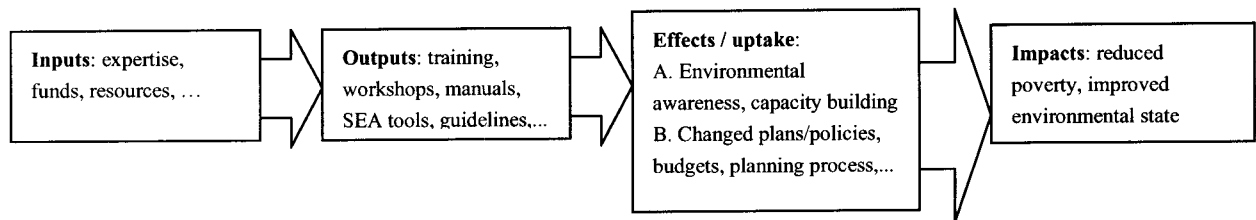
Following the decisions taken during the Ho workshop in February 2003, the SEA aimed at covering all MDA’s and all Districts. This approach has resulted in broad awareness and recognition of the importance and relevance to integrate environmental issues into plans and policies at national and District level, including MDAs which initially thought they had nothing to do with environment. Also, the SEA has strengthened general acceptance of the role of EPA as promoting environmental objectives for the sake of supporting sustainable development within Ghana (EPA is now being perceived as acting supportively (‘the EPA is now our main advisor’) instead of acting correctively and in controlling fashion). This has, most importantly, resulted in the SEA team members being fully involved in the process of updating the GPRS, with representatives in every cross-sectoral planning group.

This situation constitutes an excellent basis for further SEA activities to mainstream environment into development policies and plans, not only within the GPRS but also within other plans and policies of MDAs. More specifically, it constitutes a good basis for follow-up activities such as:

- reaching out to more MDAs,
- translating broad SEA policy recommendations into concrete activities and related budgets,
- focusing SEA at pilot Districts and critical sectors,
- capacity building, and
- interaction with donors.

However, it still remains to be seen to what extent increased awareness and initial signs of uptake by certain MDAs and Districts will result in concrete activities, change of budgets and ultimately contribute to sustainable poverty reduction.

4.2 Uptake / effectiveness



The SEA products have contributed to increased environmental awareness. This is expected to be a first condition for concrete uptake of SEA products in terms of changes within MDAs and Districts, which will ultimately have pro-poor and pro-environment impacts. Although it is quite early to be able to say something about this, the NCEIA has undertaken some interviews to assess the current level of uptake by MDAs mainly. Questions were asked like: “How has the SEA led to a change of opinions/procedures/position of the environmental unit within your organisation?”, or: “Has e.g. extra staff been recruited, are SEA principles and results used within your organisation and to what extent are these useful to you?”.

Concrete indications for uptake are the following:

Among donors:

- Willingness to support SEA activities, particularly in phase III.
- Definition of SEA related triggers for release of HIPC funds (for this year: ‘SEA report available’, for next year: ‘SEA results incorporated in GPRS’).

Within MDAs at national level:

- Many (departments within) MDAs have used SEA tools to redefine policies and/or adjust current 2005 plan and budget.
- Some (departments within) MDAs have used SEA tools for internal planning purposes beyond the policies explored by the SEA. This has led to e.g. inclusion of environmental issues in planning but also to involvement of stakeholders (e.g. other MDAs) in planning.
- Some (departments within) MDAs have included new budget lines for environmental activities.
- Some (departments within) MDAs have requested EPA for advice and support (to use SEA tools or for environmental management purposes).
- Some MDAs have strengthened or upgraded an existing environmental unit, others have become aware of the need for such a unit within their MDA.

Within NGOs at national level:

- Insight that the public sector starts to take environmental attention seriously, resulting in increased willingness of NGOs to collaborate with EPA and the public sector.

At District level:

- Some districts have adjusted plans and budgets to incorporate environmental activities, to make local development more sustainable.

Remaining questions and/or doubts are:

- The level of integration and commitment within entire MDAs: it seems that support may depend upon some individuals or departments, thus there is need for further capacity building including Executive Directors.
 - The extent to which consequences are being integrated within plans and budgets instead of being considered as add-ons: some MDAs seem to suggest that additional activities will require external funding for implementation.
 - The level of vertical integration: the linkages between adjusted plans and budgets at national level and District level plans and activities (translation from national to decentralised levels).
 - The level of horizontal integration: the active involvement of all MDAs in order to be able to integrate environmental attention as a cross-cutting issue and not be limited to certain sectors.
 - The involvement of the private sector: this has been difficult, but diffusion seems to take place through the Ministry of Private Sector Development. There is need also to involve commercial banks since they are highly influential through supply of credits.
 - The extent to which adjusted plans and activities at District level are really implemented: it is too early to say something about this.
 - The extent to which national programs consisting of many small scale projects will undergo SEA in order to avoid undesirable cumulative impacts (the case of an EU program on small-scale credits was mentioned as an example).
- The NCEIA advises that in phase III measures are taken to monitor, document and report on effects and impacts as far as possible, present and distribute these to stakeholders involved and take measures to overcome doubts as expressed above.

4.3 Impacts

It is still too early to say something about impacts of the SEA. The NCEIA recommends to give high priority in the context of GPRS to impact monitoring.

4.4 Monitoring

The SEA team will need to set up a monitoring system to measure their performance at 3 levels:

- Delivery of SEA products: this is being done by reporting on products and process.
- Effects and uptake of SEA products: this still needs to be done.

- Impacts of SEA: this will need to be done as part of overall GPRS monitoring – see above.

The priority now should be to develop and implement a monitoring system on effects and uptake of SEA products, for purposes of: internal learning (what works and what does not work), internal planning (what must be strengthened, expanded or has been adequate), and reporting on progress (to donors and other interested parties).

Proposed are the following indicators for uptake by MDAs:

- The number of individuals or departments within MDAs able to implement SEA tools by themselves.
- The number of Executive Directors (including the ED within the Ministry of Environment itself) within MDAs aware of and supportive to SEA.
- The number of departments within MDAs using SEA tools for annual planning purposes.
- The number of policies or plans adjusted based on use of SEA tools.
- The number of new budget lines and budget changes as a result of using SEA tools.
- The number of requests for advice and support by MDAs to EPA on use of SEA and capacity building on SEA.
- The number of MDAs with an environmental unit and/or environmental expertise.

Similar at District level:

- The use made of SEA tools for planning purposes.
- The number of plans and budgets with environmental activities based on use of SEA tools.
- The number of adjusted plans being implemented with associated budgets.
- The NCEIA advises that a monitoring system to measure effects and uptake is set up, and a baseline is established as soon as possible, at the end of Phase II.

5. COMMENTS AND SUGGESTIONS ON THE FIRST DRAFT DOCUMENT ON PHASE III

5.1 Justification

In its Mid-Term Review of October 2003, the NCEIA advised to already think about and propose a phase III to sustain the SEA project. Several suggestions were given. The Steering Committee in December 2003 discussed the advice of the NCEIA and decided which activities should be carried out in phase II and which ones postponed to phase III. Implicitly the Steering Group already decided on the need for and feasibility of a phase III.

This NCEIA final review demonstrates that the SEA process has been broadly appreciated and that a broad basis of acceptance and understanding of the SEA concept, tools and procedures has been established. However, a follow-

up is required to harvest the fruits (mainly in terms of updating the GPRS), and to test the full potential of SEA, mainly by undertaking pilot District and sectoral SEAs, and finally to further build SEA capacities.

- The NCEIA advises to maintain the momentum created by the SEA phase II through proposing an SEA phase III that further builds upon the results and awareness raised so far. This is especially relevant for involvement in the updating and production of the GPRS 2006-2008, by feeding SEA results into the GPRS.
- The NCEIA advises the RNE to consider supporting an SEA phase III, or parts of it.

5.2 Contents

5.2.1 Structure

The NCEIA notices that the next steps in the SEA phase III as formulated in the Executive Summary of the SEA report are grouped into four programme components:

1. SEA contribution to the update of the GPRS
2. SEA at district level
3. SEA at sectoral level
4. Institutional strengthening and capacity building

In the draft proposal for phase III, the programme components have been grouped under five broad headings (roll-over from phase II, capacity building, sectoral SEA's, other activities and international activities). This is rather confusing as the logical match between the next steps and phase III now seems to be absent. For instance, the district pilots as proposed in the next steps, do not appear in the phase III proposal.

- The NCEIA recommends to maintain the same structure for the phase III proposal as proposed in the Executive Summary of the SEA report.

5.2.2 Detailed advice on programme components

Some remarks by the NCEIA concerning the above programme components are:

1. SEA contribution to the update of the GPRS

- Work proactively as well as demand driven.
- As part of a pro-active approach, develop packages of inter-thematic pro-poor and pro-environment programs, as input and for inspiration in cross-sectoral planning groups for GPRS update.

2. SEA at district level

- In terms of selection criteria, strike a balance between urban and rural Districts, as well as northern (low potential) and southern (high potential) areas.
- Make sure stakeholder participation includes CBOs and local chiefs / traditional authorities.
- Consider taking one watershed area including a number of Districts.
- Include as a possible outcome a set of Do's and Don'ts as agreed upon by stakeholders during the SEA.
- Work out concrete costing aspects (budgetary consequences) of recommendations and policy options.
- Involve Town and Country Planning Departments for implementation of the proposed activities.
- Consider creation of environmental committees in pilot Districts.
- Include supply side data on natural resources in the GIS system.
- Include, where possible, justification (references) and supportive evidence and quantitative data (sources) to make conclusions more objective and convincing to decision-makers.

3. SEA at sectoral level

- In terms of selection criteria, take sectors with potential financial support by donors and in accordance with the priorities in the GPRS.
- Make sure stakeholder participation includes the private sector.
- Include as a possible outcome a set of checklists and guidelines for the studied sector, to be used as policy advice on environmental impacts and opportunities within the sector.
- Work out concrete costing aspects of recommendations and policy options.
- Consider integrating PSIA and SEA tools for selected sector/s.
- Include where possible justification (references) and supportive evidence and quantitative data (sources) to make conclusions more objective and convincing to decision-makers.

4. Capacity building

The proposal now seems to put great emphasis on capacity building. Eleven target groups are identified. The NCEIA is of the opinion that this capacity building should not take place as a separate exercise and in the form of a series of theoretical training sessions, but rather as 'learning by doing', in parallel with the above three programme components.

- The NCEIA recommends to support capacity building shaped as 'on-the-job training' and with priority target groups. In a later stage, capacity building could include other target groups as well. In order to get 'SEA-believers', it is considered a priority to demonstrate convincing results that SEA works in the Ghanaian context, like how SEA influenced the GPRS 2006-2008, and demonstrate clear benefits from sector and district SEA's.

5.2.3

Institutional issues and international activities

The project items grouped under institutional issues in the draft phase III document, 'development of framework for SEA legislation', 'revise EAP' and 'links to the MDG and NEPAD' do not clearly demonstrate how these link to the conclusions under the heading institutional issues as presented in the Executive Summary.

- The NCEIA recommends to further elaborate the planned institutional activities for phase III in order to create adequate arrangements for institutional rooting of SEA in Ghana. The aim is to find out how and where SEA procedures and responsibilities can best be institutionalised into existing decision-making processes and structures. This involves both horizontal relations (between institutions at national level, including private and civil sector) and vertical relations (between Districts and national level). This most probably requires another institutional analysis study, along the lines as proposed by the July 2002 NCEIA advice.

In relation to the planned international activities, the NCEIA is of the opinion that e.g. the staging of the African Conference, planned for November 2004 is rather ambitious at such short notice. However, it would be useful to organise a workshop with a number of key players and SEA practitioners in the African context in order to set up a network, exchange experiences and agree on the steps to take for planning a conference for 2006. This Conference could have a major focus on exchanging experiences, identifying lessons learned and establishing a firm network for SEA in African context.

- The NCEIA recommends organising a workshop in 2005 and a conference in 2006, along the lines as described above, as part of SEA phase III. Note that the preparation of the workshop and conference should not negatively interfere with the efforts needed by the SEA team in view of phase III activities as proposed.

There are also ideas on updating the National Environmental Action Plan, and to bring it in line with global aspirations related to MDGs and NEPAD goals. This could either be a fifth programme component of SEA phase III, or be a separate project. There are close relations with SEA activities anyway, since the lack or scarcity of reliable environmental data is a serious flaw in proper SEA practice.

- The NCEIA recommends considering a project or phase III component of updating the NEAP. With it, or linked to it, the subject of accounting natural resources could be taken up, being a world-wide tool within environmental agencies to mainstream environmental issues.

5.3 Time scale, budget and management structure

The phase III proposal does not yet contain information on time scale and budgets.

- The NCEIA recommends to adopt a phased approach, with the update of the GPRS, sector and district SEAs as a first priority, including the related capacity building aspects. These activities could be scheduled for the first year and subsequently be reviewed before planning further activities. It is expected that after one year much more can be said about effectiveness and impacts than at the present moment.

No budget has as yet been proposed for phase III.

- The NCEIA recommends the SEA team to indicate which part of phase III can be covered by national funding, and the RNE to provide matching funds.
- The NCEIA recommends the SEA team to propose bridging funds (to cover the expected period between phase II and agreement on phase III).

The management structure for phase III has not yet been proposed, but this is probably implicitly expected to remain the same as for phase II.

- The NCEIA recommends the Steering Committee to think about their own role and management of phase III in general terms, during their first future meeting. See also NCEIA advice under section 5.5 concerning co-ordination requirements.

5.4 Feasibility in terms of human resources and capacity

Within the RNE and among other donors there are some concerns about the available human resources and capacities to be able to run an SEA phase III alongside other projects like Gea-CAP and updating of NEAP. The NCEIA has understood that a parallel project proposal has been submitted to the RNE for EIA capacity building, and one for updating NEAP is expected. The RNE would greatly favour one programmatic approach for these 3 project components, showing how these three projects are linked and how capacities are being used and built up in mutual synergy and collaboration. It is well understood that these three components (EIA, SEA and NEAP) are strongly interrelated and inter-dependent.

- The NCEIA recommends the EPA to think about effective means of capacity building and use of existing human resources and capacities. This might involve training of trainers, using experienced SEA practitioners for training purposes, and using more external consultants (national or international).
- The NCEIA also advises the EPA to discuss within the phase III document risks related to absorption and implementation capacities within EPA, and where possible demonstrate linkages with EIA/GeaCAP and NEAP projects or initiatives. The NCEIA recommends to harmonise wherever possible EIA and SEA capacity building initiatives.

5.5 'Buy-in' from other donors

The NCEIA met with several donors in order to find out interests for participation in phase III. The following are initial findings:

- British High Commissioner: has already provided some funds for SEA training during phase II. Its field of interest would be energy.
- DFID: now provides support to NDPC for the update of the GPRS and would in a phase III be an interested partner for SEA at local government level. DFID is also interested to support the SEA Africa conference.
- EU: has shown interest in the mining sector.
- CIDA: did not express a specific interest but is focussing its activities on environmental management in Northern Ghana and could therefore be involved in district SEA pilots in that part of Ghana.
- UNDP: shows interest in a State of the Environment Report and could perhaps link up to the SEA phase III activities in relation to MDG, NEPAD and the National Environmental Action Plan. UNDP might also be interested to support activities on environmental accounting.
- JICA: is mainly working in the water sector, but did not specifically express interest.
- DANIDA: is already working on an SEA for the transport sector and is fielding a mission in August-September targeting the water supply and sanitation sector. Foreseen are: support to apply SEA tools and principles into the (i) the National Water Policy of Ghana, (ii) IWRM planning for the Densu River Basin and (iii) water and sanitation plans.
- The NCEIA advises to give follow up to these expressed interests as part of preparations for SEA phase III. EPA and NCDP will need to look into ways of assuring high quality co-ordination and management of phase III involving these pilots, which is expected to be more complex than phase II if a variety of actors is involved (donors, consultants, steering committee, stakeholders etc.).