

Feature

NEMAP : Some Criticisms and Responses

by Dr Saleemul Huq

THE National Environment Management Action Plan (NEMAP) is being undertaken by the Government of Bangladesh through the Ministry of Environment and Forest (MOEF) in cooperation with NGOs through the Coalition of Environmental NGOs (CEN) and Association of Development Agencies of Bangladesh (ADAB) along with other groups, such as the Bangladesh Centre for Advanced Studies (BCAS) and Forum of Environmental Journalists (FEJB). During the last six months a series of twenty-three grassroots participation planning workshops were undertaken in different agro-ecological zones, six regional workshops, six professional workshops and a national workshop were held. At the national meeting, the Prime Minister congratulated the MOEF and NGOs on carrying out the NEMAP process and directed them to take the Draft NEMAP back to the people to get their endorsement of the final product.

The consultative phase of the NEMAP format was thus taken back to the people through six more regional workshops during September in order to get their feedback on the synthesis process. The document is to be prepared and circulated during the latter half of October.

An innovative approach to participatory planning it had to face and overcome many methodological issues including: (i) How can a national plan be participatory when all citizens are potential stakeholders? (ii) How are people to be encouraged to give their opinions in a manner which can be analysed? (iii) How can geographical representations be ensured? (iv) How can the views of different professionals and socio-economic levels be accommodated? (v) How can such a large and diverse information base be synthesized into an action plan? (vi) How can the different parts of civil society be incorporated into such an action plan? These are only a few of the methodological problems that had to be grappled with. It is quite obvious that there is no single methodology which would satisfactorily deal with all the concerns expressed.

The steering committee, consisting of representatives from the government, NGOs, academia and media spent many hours and days struggling with these issues and tried to address them as adequately as possible within the time and resource constraints. Understandably, the NEMAP process has been subjected to criticisms, some (if not all) of them justified. These have come from many sources including the grassroots participants themselves, academics, government officials, NGOs, journalists and others. The NEMAP steering group consider such criticism not only as healthy but an integral part of the NEMAP pro-

cess to allow it to learn from mistakes and make course corrections.

A number of criticisms were raised in a paper by Dr Zahir Sadeque, a former Professor of Sociology at Rajshahi University and currently Environmental Adviser to USAID. Dr Sadeque in his article has given reasonably accurate description of the genesis of the NEMAP over the last few years and how the present participatory process came about. He then made a number of observations and critiques of the current phase

of the country. It was obvious that consulting all of the country's citizens was impossible, so a process was developed which was reasonably participatory and reflected all geographical, ecosystem, social groups, professional groups and had gender balance. Thus, twenty-three locations were chosen representing all the major agro-ecological zones, and NGOs were involved in organizing workshops where around 70-80 participants were invited representing

It was by no means a "summary document". However, one of the useful feedbacks from the second round of consultative workshops was the strong emphasis on specific regional problems which had not been reflected in the list circulated.

Finalisation of the NEMAP Synthesis Document

Dr Sadeque has rightly pointed out the difficulty of rendering such a wealth and density of information into a coherent and "prioritised" plan. It is inevitable that the process of synthesis will ren-

der that the donors should have been consulted. I would take issue with him and say that NEMAP is a national plan and not a donor document.

Therefore, the one group who do not need to be consulted are the donors! Furthermore, the donors nowadays claim to "prefer national demand driven" plans and the NEMAP will be, if nothing else, a Bangladesh plan.

The Role of MOEF

The Ministry of Environment and Forest must be congratulated on their open, cooperative and pro-active policy of participation in the process. They have responded magnificently to all suggestions for increasing public participation and awareness. They have also taken a continuous and strong interest in the contents of the document and have by no means been reticent in giving their inputs and opinions. It has been a real partnership between the MOEF and NGOs on the participatory process and between the MOEF and Resource Persons in the writing process.

UNDP's Lack of Intellectual Leadership

Here, again I must take issue with Dr Sadeque's advice to UNDP to take intellectual leadership. In my view, and I believe this view is shared by UNDP, they have no place giving the intellectual leadership to NEMAP. The process is now completely Bangladeshi and that is how it should be. If it fails to satisfy anyone then that is the fault of the organisers and writers, but they will have to live with that. It is not for UNDP (or any other donor) to step in and take intellectual leadership from them.

It is also wrong of Dr Sadeque to imply that by (only partially) funding the NEMAP exercise UNDP somehow should exercise ownership over it and take over its intellectual leadership. The Government of Bangladesh and the NGOs together have contributed nearly half the total costs of the NEMAP participatory exercise in terms of manpower and other resources and the entire process has been carried out by Bangladeshis without any external input.

Finally, it is perhaps premature to be discussing the contents of the NEMAP document before it is finalised but it is a healthy exercise to engage in debates about what it should contain. What can perhaps be said with some degree of certainty is that the final NEMAP document will not satisfy everyone but hopefully it will be recognised as an important step forward, if not the last word, in participatory environmental planning.

The writer is Executive Director, Bangladesh Centre for Advanced Studies, a private, non-profit, research and policy institute which was involved in conceptualising and carrying out the NEMAP process with the Ministry of Environment and Forest.

Contents of the "Summary NEMAP Document"

Dr Sadeque refers to a "Summary by BCAS" and makes a number of criticisms of its contents. He would have done better to wait for such a summary to be released before making the criticisms. As mentioned earlier, no document has yet been prepared, even in a draft form. What was circulated at the consultative regional workshops in September was simply a list prepared by the NEMAP consultants (and not by BCAS) of issues of concern drawn from all the sources consulted in the NEMAP process. This was shared with people in different regions to ensure that none of their concerns were omitted.

Consultation with Donors

On Dr Sadeque's suggestion

Many (though not all) of these criticisms are quite cogent and valid and deserve to be given careful consideration. A response to the major issues raised is given below.

The Participatory Process

As has been mentioned in the case of a "national action plan" the legitimate stakeholders are all 120 million citizens

wide received operational consents in the same period.

The Indian government, being the first in the world to enforce audits, is not just a pioneer but one that leaps before it thinks," remarks the Delhi-based head of a leading pharmaceutical company.

The biggest hitch to the filing of environmental statements is their submission to pollution control boards. MEF officials assure that "the information contained in the statement cannot be used against the industry by the authorities. The consent mechanism — or no objection certificate — already exists to enforce compliance with environmental laws."

MEF reveals that not a single industry has been penalised yet. "Punishment would not be fair because not many

industries are even aware that such a law exists, nor are they qualified to hold an environmental audit," says officials.

Counters Chandak, "This awareness and expertise should therefore have been created before the notification was issued. Even the WMC scheme will be too localised to have an impact quickly."

The CPCB, however, contends that it will soon begin an extensive exercise to compile and analyse the data available with SPCBs. The industries will then be given feedback of an advisory nature.

Finally, only an analysis of the statements submitted will deliver final judgement on whether the government was too hasty in forcing resource conservation, thus relegating it to a perfunctory form-filling exercise

— CSE

Environmental Audit : The Value-addition of a Clean-up

by Rimjhim Jain

introduced a proactive approach to the conservation of natural resources, rather than a command-and-control approach."

WMC critics, however, anticipate problems. Argues SP Chandak, director, pollution control, National Productivity Council, "The environmental audit notification was hurriedly put into force without first creating the necessary back-up awareness and expertise which

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Corporate environmental responsibility : Lifting the smokescreen

Control Boards (SPCBs) by September 30 this year for the previous financial year, will be prepared by conducting an environmental audit.

The environmental audit notification was issued by the ministry of environment and forests (MEF) in March 1992 and amended in April last year. The audit will take stock of the raw materials consumed, product output, wastes generated, methods of waste disposal, and the environmental impact of the industry on its surroundings.

AWMC will get audit training and advice from the government and industry associations. The maintenance of a log-book is expected to establish an auditing process which can systematically continue. "We hope that there will be a multiplied effect in the industry," says Nyati.

The WMCs will involve district industrial centres and the existing network of small industries' support institutions to generate a mass movement.

Nyati says, "For the first time the government has in-

creased its proper implementation."

Admits Nyati, "With a first-time environmental audit costing between Rs 75,000-200,000 (US \$2,500-6,700) and taking as much as 15 months to complete, small scale industries are finding it difficult to cope."

Model audits in 120 industrial units in the 18 highly-polluting industrial sectors like cement, distillery and leather processing were conducted by Central Pollution Control Board.

Unfortunately, although the notification has been in force for the past two years, only 2,995 statements were filed upto December 1993, although 113,760 industries country-

wide received operational consents in the same period.

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