
IMPLEMENTATION OF THE GAMBIA ENVIRONMENTAL ACTION PLAN

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Implementing Policy Change Project

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LIST OF ACRONYMS

ACCNO	Advisory Council for the Coordination of NGO Activities
AID	United States Agency for International Development
AFET	Association of Farmers, Educators and Traders
ANRUS	AID Agriculture and Natural Resources Program
CRMA	Community Resource Management Agreement
CRS	Catholic Relief Services
EAP	Environmental Action Plan
EIA	Environmental Impact Assessment
EU	Environmental Unit of MNRE
GEAP	Gambia Environmental Action Plan
GGFP	Gambia-German Forestry Project
GRUDA	Gambian Rural Development Association
GTZ	Deutsche Gesellschaft Fur Technische Zusammenarbeit
IPC	AID Implementing Policy Change Project
MLGL	Ministry of Local Government and Lands
MNR	Ministry of Natural Resources (formerly MNRE)
MNRE	Ministry of Natural Resources and the Environment
MOA	Ministry of Agriculture
NEA	National Environmental Agency
NEAP	National Environmental Action Plan
NEMA	National Environmental Management Act
NEMC	National Environmental Management Council
NESDA	Network for Economically Sustainable Development in Africa
NGO	Non-Governmental Organization
NIB	National Investment Board
NRM	Natural resource management
PSD	Programme for Sustainable Development
SCF	Save the Children Foundation
SWMU	MOA Soil and Water Management Unit
TAC	Technical Advisory Committee
TANGO	The Association of Non-Governmental Organizations
TCP	Technical Cooperation Program of the GEAP
UNDP	United Nations Development Program
UNICEF	United Nations Children's Fund
USAID	United States Agency for International Development
WG	Working Group
WRI	World Resources Institute

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I. INTRODUCTION

The formulation and implementation of natural resource management policies that create consistent and effective incentives for sustainable development is one of the most daunting challenges facing African governments. A major initiative in meeting this challenge has been the development of National Environmental Action Plans (NEAPs). The impetus for the development of NEAPs came from widespread recognition that the abundance of studies, reports, and strategies generated by countries and donors has not made an appreciable difference in addressing the root causes of environmental problems. As Talbott and Furst (1991: 45) point out, the main problem was not the lack of awareness of environmental problems, but "...an urgent need for effective and integrated action, across all sectors, that involves donors, governments, parastatals, academics, businesses, marginalized resource user groups, and farmers within a coherent national-level policy framework." The Gambia Environmental Action Plan (GEAP) is an example of such a framework, designed to provide the long-term vision and direction towards the goal of sustainable development, and the overall plan for integrating sectoral programs to reach that goal. The present study examines management and institutional issues influencing implementation of the GEAP.

This study forms part of an ongoing examination of management issues affecting the implementation of natural resource management (NRM) policies in Africa, funded by the Agency for International Development (AID) Africa Bureau. The Africa NRM study is part of the larger analytical agenda of the AID Implementing Policy Change Project (IPC) that seeks to enhance implementation of policy reforms through the application of strategic management concepts and practices.¹

A. Scope and Methodology of the Study

Fitting as it does within the larger Africa NRM policy implementation study, the present analysis combines two interrelated objectives: 1) to advance understanding of institutional issues and identify options that may enhance successful implementation of the GEAP, and 2) to compare the Gambian experience with other similar situations and draw conclusions that may be more broadly applicable. In this way, the lessons of previous experience and analyses provide insight for those working toward implementing the Gambia Action Plan, while examination of GEAP organization and management issues provides an important case study for the larger NRM investigation and will help solidify its conclusions.

The study benefitted from the participation of Dr. Clement Dorm-Adzobu of the World Resources Institute (WRI) and the Network for Economically Sustainable Development in Africa (NESDA), who joined the study team in The Gambia December 6-22, 1993. Dr. Dorm-Adzobu is coordinator of a WRI comparative study of institutional arrangements of ten African NEAPs. Given the complementarity of the objectives of the WRI and IPC studies, the three individuals carried out their interviews and document reviews as one combined

team. Site visits to NGO and donor NRM projects were conducted in the North Bank and Western Division.

The team held debriefings with USAID and NEA and delivered a working draft of the report prior to departure from Banjul. An updated draft was sent for comments soon after the team returned to Washington, and a final draft incorporated comments from the USAID Mission, GEAP implementors, and AID Washington.

B. Defining Policy and Policy Implementation

The study uses the broader definitions of policy and policy implementation that are used in the previous IPC/NRM studies mentioned above. **Public policy** is defined as government decisions to use its resources to intervene in the behavior of (some) citizens to change that behavior in a desired direction. These decisions are formally embodied in laws, decrees, and other legal statutes.

Policy implementation is defined as the process that runs from the passage of the basic statute, through the decisions and outcomes of designated implementing entities, to the compliance of target groups with the policy objectives. Policy implementation covers the operationalization of policy prescriptions into goals and actions that specify the agents, procedures, capacities, and behaviors required to produce the intended outputs at various levels (national to local). Consequently, the focus of this study is on the analysis of the factors that influence achieving the policy objectives throughout the entire implementation process.

C. The General Analytic Framework

The IPC case studies of African NRM policy use an analytic framework to organize the discussion of the implementation factors in which success is seen as a function of three categories of variables: i) the problem the policy is intended to solve, ii) the way implementation is structured and managed, and iii) the sociopolitical and economic setting in which implementation takes place (Mazmanian and Sabatier 1989: 18-48). These variables can be broken down into six conditions associated with successful implementation:

1. The policy and its statute(s) contain clear and consistent objectives, or some criteria for resolving goal conflicts.
2. The policy accurately identifies the principal factors and linkages leading to, and influencing, policy outcomes, including specification of target groups and incentives.
3. Policy implementation is structured to maximize the probability of compliance from implementing agents and target groups. This includes: assignment of implementation responsibility to a capable and sympathetic agency; integrated implementation structures with adequate incentives for compliance; supportive decision rules (e.g., appropriate authority and procedures); adequate financial resources; and access to, and participation of, supporters.

4. Leaders and top managers possess substantial strategic management and political skills, and are committed to the policy objectives.
5. The policy receives ongoing support from constituency groups and key stakeholders within a neutral or supportive legal system.
6. Socioeconomic and political conditions remain sufficiently supportive and stable so that the policy is not undermined by changes in priorities, conflicts, and/or radical shifts in resource availability for implementation.

These six represent the optimal conditions that seldom, if ever, exist throughout policy implementation--anywhere. Examining the policy implementation context against these ideal conditions can aid, however, in determining strategies for maximizing the chances of success and for identifying policy management options that may be most appropriate for the prevailing conditions.

D. Implementing National Environmental Action Plans

These ideal characteristics are thought to apply to most policy implementation situations, regardless of their technical or sectoral focus, and are used in Section III of this paper to organize discussion of the context for implementing The Gambia's Environmental Action Plan. It is important to clarify, however, what "successful implementation of the GEAP" means. The desired outcomes of natural resource policy and the characteristics of broad policy frameworks like NEAPs differentiate these policies in several important ways that influence how implementation should be analyzed.

Often the first question to ask in analyzing policy implementation factors is "What does the policy do?" or as the first category of variables mentioned above puts it, "What problem does it attempt to solve?" The simplest answer is that the GEAP provides the long-term vision and direction towards the goal of sustainable development, and the overall framework for integrating sectoral programs to reach that goal. The immediate problem it addresses is the lack of a coherent national framework and plan for addressing complex environmental issues that cut across sectors, ministries, and even national boundaries. Achieving a common vision and appropriate coordination of efforts, however, is only an initial step. Ultimately, successful GEAP implementation must involve widespread behavioral change of natural resource users that leads to sustainable development.

The GEAP is not the full embodiment of natural resource policy in The Gambia. It is both more encompassing (incorporating urban environmental health issues, for example) and more limited, setting out the overall vision, priorities, and strategies, but not the specification of detailed policies or programs. Its broad scope and expression of agreed-upon national objectives necessarily limit the clarity of specific policy statements and do not allow for much detailed operational guidance. This guidance, however, should be forthcoming from the structures and processes initiated by the GEAP. A key consideration, then, is the institutional structure and management of the GEAP as it relates to orienting and coordinating the efforts of numerous government and non-government agencies. In other words, GEAP

implementation should be judged by what it brings about to organize and set the stage for changes in actual natural resource use.²

Analysis of economic development policies has a long tradition of linking policies, incentives, and behavior. It is generally recognized that economic development can best be achieved through a host of individual--rather than centrally planned--decisions of producers, traders, consumers, and investors. Recent economic policy changes in The Gambia and elsewhere have shifted emphasis from government control and intervention to market incentives. Economic policies that provide appropriate and consistent incentives will succeed; those that do not will fail.

A similar dynamic applies to natural resource management. Government controls, even well-intentioned interventions to help communities improve their resource base will succeed over time unless people perceive enough real benefit from improved resource management practices to justify their cost. NRM policies and programs will have little impact over the long term if they do not provide appropriate incentives that affect individual practices. Creating an enabling environment that provides these signals and incentives so that myriad individual decisions lead to the desired national goals is a very difficult challenge in NRM policy everywhere. The environmental policy framework established in the GEAP is a critical element in orienting government and donor response to meet this challenge.

Consequently, analysis of GEAP implementation should incorporate several levels of effectiveness: i) the ability of the overall coordinating mechanisms contained in the GEAP to influence the process and resolve conflicts; ii) the extent to which programmatic implementation activities of the government and non-government actors contribute to the national objectives in a harmonious and coherent fashion; and iii) the behavioral changes among resource users that result from the policies, programs, projects, technologies, and other incentives that are developed within the overall direction provided by the GEAP.

II. THE GAMBIA'S ENVIRONMENTAL ACTION PLAN

A. The State of the Environment and Natural Resource Management

Detailed analyses of environmental problems are available in a number of documents, including the GEAP itself,³ and need not be repeated here. One of the most striking things about the analyses is the clear connection between environmental degradation and production activity.⁴ Tradeoffs and conflicts between conservation and development are evident, but to a large extent the serious environmental problems identified relate directly to production systems and priority problems of the country's socio-economic development.

The population of The Gambia is estimated at just over one million and growing at an annual rate of 3.4 percent. The explosiveness of this growth rate is illustrated by the fact that the population in 1950, when many of today's policy makers were growing up, was estimated at 200,000, about one-fifth of its present size. Over half the population is under fifteen.

Total population will double and surpass two million before 2020. Given the current age structure, this will occur in spite of any foreseen reduction in the current growth rate.

This rapid population growth has resulted in the progressive depletion of natural resources in all areas. Most virgin and forested land has been brought under cultivation including fragile areas, and over-grazing has led to advancing desertification. Since 1920 forest cover has declined from 80 percent of land area to six percent. Only 1.5 percent of the closed canopy forests remain intact. The symptoms of the stress related to land shortages are evidenced by disputes over land tenure, food insecurity, and urban migration.

Exacerbating this situation has been the decline in rainfall since the mid-1970s. Average precipitation has declined by about 30 percent to around 800 mm in the south west and 500 mm in the extreme north. Rainfall decline has been accompanied by soil degradation due to deterioration of the soil structure and water-holding capacity. Reduced surface flows have resulted in greatly increased salt water intrusion in more than half the River Gambia. Consequently, the area under rice cultivation has dropped by about 50 percent over the past five years, average peanut yields have declined by about 20 percent since the mid-1970s, and coarse grain yields have declined by about 25 percent over the same period. As the GEAP points out, "The picture with all crops is one of declining returns to land and labour as a result of over-cultivation and consequent loss of fertility" (p. 9).

Environmental degradation is also manifest in increasingly serious urban environmental problems due to rapid urbanization. Land clearing and building on the foreshore, the removal of beach sand for construction, and rising sea levels are responsible for the degradation of the country's coastal ecosystems. Inappropriate disposal of solid waste and sewage is an increasing problem in the Greater Banjul Area, and the incidence of diarrhea and dysentery due to contaminated drinking water is second only to malaria among patients at hospitals and health centers.

The present situation is far from being an ecological catastrophe, and although the word "crisis" is often used, the situation is perhaps better characterized as a slow but relentless degradation of the natural resource base, declining productivity, and increasing population pressure whose full effects will only be felt in the future. Environmental degradation and its impact on livelihoods and well-being is experienced directly by a large proportion of Gambian society.⁵

These problems are not new and have been dealt with by a large number of public institutions in The Gambia. These institutions have been hampered from achieving their goals by various constraints, identified in the GEAP and elsewhere, notably the scarcity of human and financial resources and an inadequate legal framework. Their programs, supported by numerous donor and NGO projects, suffer from a lack of effective coordination and the sectoral dispersion of technical and managerial functions that makes addressing complex multi-sectoral issues difficult. The Action Plan acknowledges that government policies and programs have failed to make much of an impact in convincing people to adopt sustainable and economically viable NRM systems. A number of projects have had notable success, but

the total area covered by the limited number of protected areas and donor-funded pilot projects is extremely small when compared to the pervasiveness of the problems.

B. Origins of the Environment Action Plan

Government attention to environmental problems has existed for some time, starting with the President's Banjul Declaration in 1977, which emphasized the importance of preserving the country's natural resources. An Environment Unit was created in 1981 as a first attempt to coordinate policy and legislative measures. The National Environmental Management Act (NEMA) was enacted in 1987, establishing a National Environmental Management Council (NEMC) made up of the ministers of the various ministries with responsibilities relating to environmental issues. During this time, several initiatives were undertaken to identify and propose strategies to deal with environmental problems, including the Indicative Plan to Combat Desertification and the Tropical Forestry Action Plan.

The lack of progress in tackling complex environmental problems in a coordinated manner, however, coincided with the World Bank's interest in promoting long-term perspective studies at the national level, one aspect of which is the demand for National Environmental Action Plans. Donor interest has undoubtedly been important in focusing attention on environmental problems in The Gambia, but clearly coincided with the government's own concerns. To a large extent, environmental and natural resource management considerations are inescapable when dealing with most economic development and social programs in The Gambia--unlike the situation found in some countries where environmental concerns would not receive a similar priority were it not for donor pressure.

C. The GEAP Design Process

NEAPs have often been described as much as a process as a plan (e.g., Talbot 1994). The Gambian experience illustrates this aspect, whereby the formulation process established accepted methods of operation (workshops, inter-ministerial working groups, etc.) that carried over into implementation. The NEAP process in The Gambia was initiated in February 1991 with a Consultative Technical Workshop held in Banjul, convened by the NEMC and financed by UNICEF. The aim of the workshop was to identify and recommend broad national as well as specific sectoral environmental policies. A wide array of organizations attended the workshop including government institutions, NGOs, donor representatives, and the private sector. The main objectives of the workshop, which were intended to be carried through the entire NEAP process, were: i) to identify the critical environmental issues in The Gambia; ii) to initiate broad-based participation involving all groups with a vested interest in the environment; and iii) to launch the beginning of a sustained public environmental awareness campaign.

The workshop was divided into three main themes covering NRM, social services, environment and development. Three technical working groups prepared papers on these themes, which together with an account of the deliberations of the plenary sessions were consolidated into a workshop report. Soon after the workshop, two working groups on

natural resources and social services were commissioned to consolidate and advance the work initiated in the workshop.

These two working groups prepared draft reports that were discussed in the First GEAP Review Workshop held in July 1991. This workshop revised and added to the working group reports and produced a report that constituted the first GEAP draft. This draft was then expanded upon by two UNDP-financed international consultants who were guided by a third working group established in December 1991. This resulted in a semi-final draft that was reviewed in a final technical workshop in February 1992. The GEAP final draft was published in May and approved by Cabinet in July 1992.

D. Contents of the Action Plan

Implementation of the GEAP, as discussed above, encompasses institutional change, NRM policy reform, and other programmatic actions set in motion by the Plan. Before turning to discussion of implementation experience in this broader sense, it is useful to review briefly the contents of the GEAP. The document is divided into two volumes, the first of which is the Action Plan covering the period 1992-2001. It provides a review of the existing environmental situation and outlines policy objectives, programs, and implementation strategies. The second volume presents the donor investment program required to support GEAP implementation during its first five-year phase (referred to as the Technical Cooperation Program--TCP).

The Action Plan Strategy Framework contains seven broad **policy objectives**:

- 1) To conserve and promote the rational use of natural resources for the benefit of present and future generations.
- 2) To preserve and improve the health and quality of life of all Gambians through sound environmental management.
- 3) To preserve or restore the equilibrium of ecosystems.
- 4) To strengthen the institutional framework for environmental coordination and management at the national, regional, and global levels.
- 5) To increase the environmental awareness and understanding of the public and bring about effective public participation and community involvement in environmental management.
- 6) To ensure the integration of environmental considerations in all development strategies and related activities.
- 7) To accelerate the adoption of alternative sources of energy.

A series of problems is identified and discussed under each.

To address the policy issues the GEAP sets out three **programs**. The NRM Program is to assist producers to adopt improved land and NRM practices, manage coastal and freshwater resources, develop government/NGO partnerships for NRM, manage NRM collection and use, and develop local area integrated management plans. The Environmental Health Program focuses on urban waste management problems, industrial and chemical pollution, and increasing community involvement in controlling environmental degradation. The Energy Program addresses two main issues of introducing new and renewable source energy to substitute for fuelwood, and increasing the amount of cultured fuelwood through community forestry management programs and reducing depletion of natural forests.

To implement these programs, the GEAP identifies four **implementation strategies** for effecting policy-level changes. The first is institutional framework development and includes improving such areas as inter-sectoral coordination, NGO coordination, institutional structures for environmental planning and management, environmental legislation and regulation enforcement, and the study of property rights issues. The second strategy calls for the application of fiscal measures to improve environmental protection⁶; the third strategy recognizes the need for public awareness actions including environmental extension and education, media campaigns, and specific programs aimed at women, teachers, and medical practitioners; and the fourth strategy develops the requirements for environmental information management, addressing such issues as data standardization, collection, sharing, and dissemination.

E. Implementation Structure

1. Introduction

The final chapter of the GEAP discusses the institutional and legal framework for implementation, reviewing the situation as it existed and proposing changes in both the institutional structure and in at least twelve legislative acts that relate to the environment and natural resources. Virtually all of the institutional discussion relates to issues of inter-sectoral and inter-ministerial coordination. Most of the changes called for relate to the expansion of the formal recognition of the Environment Unit (EU) of the Ministry of Natural Resources and the Environment (MNRE), in order to achieve proper coordination of the various implementing agencies and "establish a strong coordinating agency within the existing institutional structure and the overall policy responsibility of the MNRE" (p. 48).

Although the GEAP itself ascribes the coordinating role to the MNRE/EU, it foresees the necessity of establishing a coordinating unit outside of any single ministry.

...the changing institutional relationships of the Environment Unit over the last decade serve to underline the complex inter-sectoral nature of its coordinating and monitoring role: international and inter-agency; inter-ministerial and inter-departmental; governmental as well as non-governmental; urban as well as rural. Since MNRE will be responsible for the coordination and monitoring of the implementation of the GEAP through the Environment Unit, it would be relevant to focus the present state of the Unit with a view to identifying possible

institutional deficiency that may constrain the effective execution of its expanded mandate (p. 46).

In the future, it will be necessary to create an inter-ministerial coordinating body, below Cabinet level, which has the necessary authority to ensure the timely implementation of the wide range of actions envisioned in the GEAP (p. 48).

Following approval of the GEAP in July 1992, further institutional changes along these lines were discussed by Cabinet and the EU was separated from MNRE (renamed the Ministry of Natural Resources--MNR), creating the National Environment Agency (NEA) attached to the Office of the President, which began operations in July 1993. The National Environment Management Act (NEMA) of 1987 is currently being revised to empower the Agency to fulfill its mandate and to detail its specific powers and regulatory functions. It acts currently through the powers of the National Environment Management Council (NEMC). The NEMC is chaired by the President and includes the Vice President, the Secretary General, the ministers of MNR, Agriculture, Local Government and Lands, Health, and Finance.

There was considerable experience in The Gambia prior to the GEAP process in analyzing environmental problems and implementing natural resource programs. The track record of these initiatives in terms of coordination and resource user impact was poor. The government has attempted to apply the lessons of this experience to the new structure and procedures (discussed in more detail below). The revised institutional framework, established by the GEAP and coordinated by NEA, is new and largely untested.

2. The NEA and its Coordinating Role

The GEAP provides guidance on the formulation and implementation of coherent programs to address complex issues that involve multiple organizations. Establishing and maintaining effective linkages between policies, programs, ministries, and other players is therefore one of the most critical management elements in implementation. The overall inter-ministerial coordination role is assigned to the NEA, and it follows closely what was envisioned for the Environment Unit in the GEAP--with the considerable advantage of institutional placement above the level of line ministries.⁷ As a memorandum by the President discussing the new arrangement states:

...the proposed Environment Agency will not be usurping the routine technical functions of line ministries. It will instead focus upon coordination, evaluation and monitoring activities, observance of the environmental regulatory codes, and facilitation of cooperation between all the technical services. Under the new conditions, therefore, the necessary coordination will emanate from a level above that of a line ministry, and the formulation of overall environmental policies and the coordination of the implementation of these policies will be executed at the highest level of government, through the inter-ministerial Environmental Management Council, serviced by the National Environment Agency (quoted in the NEA Draft Strategy Plan 1993-1997).

The NEA serves as the secretariat to the NEMC (the ultimate arbiter of policy and conflict resolution) and as such has a strong base for environmental management and coordination. A Technical Advisory Committee (TAC) to the NEMC will be set up to facilitate linkages with line ministries. The TAC is to be made up of the heads of relevant departments within the ministries represented on the NEMC plus representatives from the Women's Bureau and the National Population Council. It is envisioned that the TAC will meet quarterly, ahead of the NEMC meetings, and although not a decision-making body, will provide a forum for discussion of the issues and for garnering support for inter-sectoral programs. The NEA will also serve as secretariat to the TAC and will prepare its terms of reference and develop its agenda.

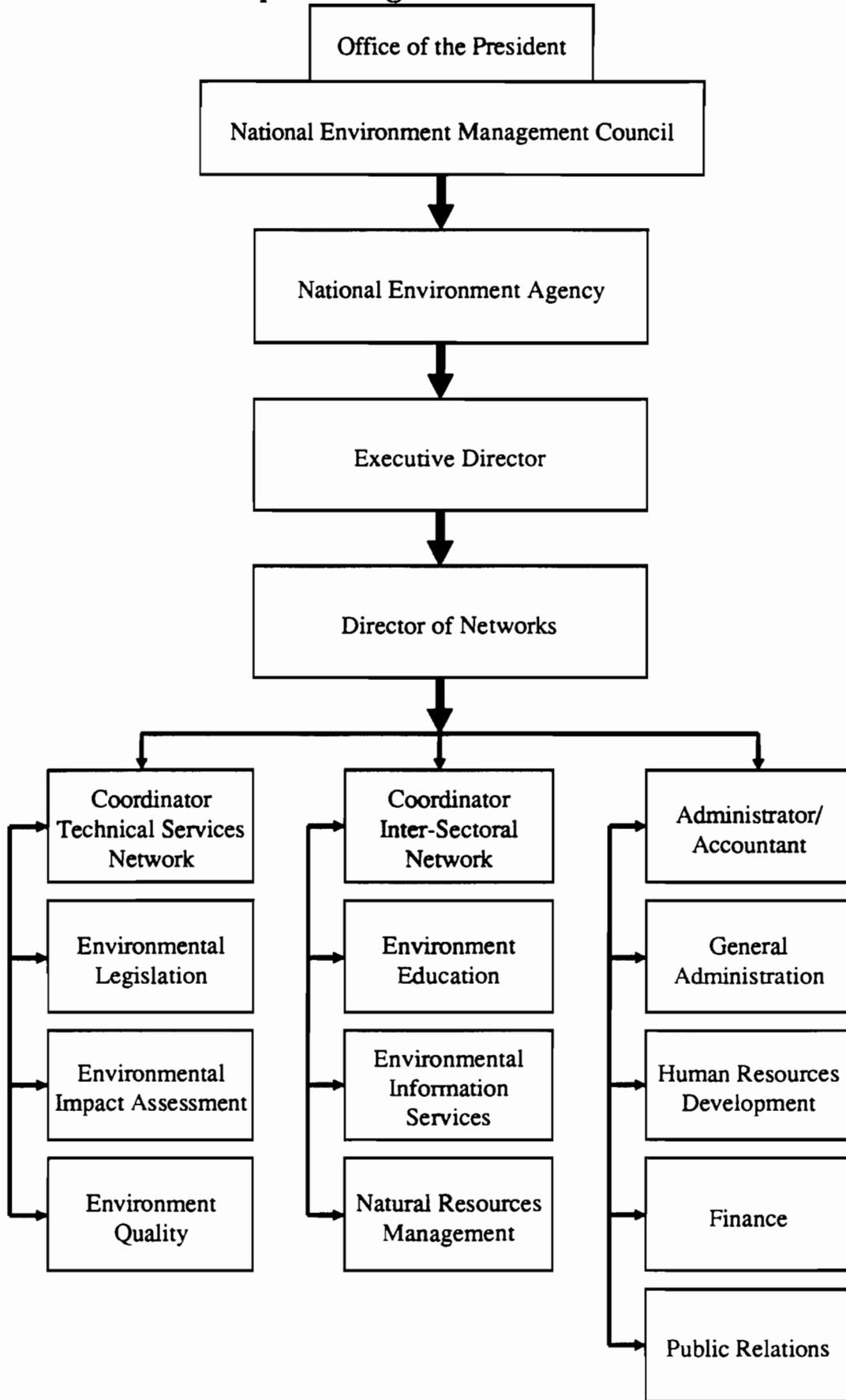
The revised NEMA makes clear that NEA is a coordinating body and is not to be involved in implementing activities that can be handled by the sector ministries, or other organizations designated by them, such as area councils, local communities, or NGOs. It is envisioned that the NEA will remain a small, streamlined unit with a highly qualified staff and has been granted status outside of the civil service to allow it greater flexibility in hiring staff, contracting services, and mobilizing resources. The recently approved NEA 1993-1995 Strategy Plan calls for a total contingent of 16 professionals and 19 support staff, to be recruited gradually over a four-year period.

The structure and operations of NEA are designed to build upon the successful elements of the GEAP process, and in many ways represent the institutionalization of the working groups and their coordination. The NEA has an Executive Director, and an Assistant Director. It is responsible for organizing and approving the delivery of technical services, environmental legislation review and planning, environmental impact assessment, and monitoring environmental quality. To reinforce the idea that these activities are to be carried out with the services and input of others outside the Agency, the coordinating units within NEA are termed "networks" (figure 1). The network structure is designed to facilitate coordination of activities of line ministries and use existing expertise in each core technical area to promote, monitor, and assess the various elements of environmental management. NEA has sufficient autonomy to contract studies and consultants and determine the terms of reference for work carried out through the network services.

The NEA is also responsible for coordinating inter-sectoral programs in the areas of environmental information, environmental education, and natural resource management. These activities will be similarly coordinated as "networks" by NEA staff. Each of these three areas has a permanent technical working group (WG), chaired by one or more of the line ministries involved, and supported by the NEA, which functions as the secretariat to the WGs and provides funding and backstopping. Other temporary working groups have been and will be formed in such areas as coastal zone management and waste management. In addition, "environmental desk officers" will be designated in each ministry, establishing a permanent and stable contact point for information flows between organizations.

These technical service and inter-sectoral program areas will be supported by at least four donor projects. A three-year two million DM program financed by GTZ is to begin in 1994 to support environmental management. The main focus of this support will be the N

Figure 1
**National Environment Agency
 Proposed Organization Structure**



but will be extended to sector institutions as well, through the auspices of NEA. Components of this program include training in policy development, priority setting, and conflict resolution; capacity building in environmental legislation; environmental impact assessment; capacity building for government, NGO, and private sector agencies; and strengthening environmental documentation center. A three-year, \$2.6 million World Bank project will develop NEA operational capacity, technical and managerial skills, and will support monitoring and policy development, environmental education and public awareness, monitoring of environmental quality, environmental information management, and disaster preparedness. USAID and UNDP projects that support ministerial implementation of natural resource programs also contribute to specific NEA activities.

The implications of this coordination framework for GEAP implementation are discussed in Sections III and IV.

3. Implementing Ministries and Their Programs and Projects

Important as these coordinating and inter-sectoral supporting services are, the implementation of government programs and policies will continue to take place through line ministries. Three of the most important ministries with regard to NRM are the Ministry of Natural Resources (MNR), the Ministry of Agriculture (MOA), and the Ministry of Environment and Lands (MLGL). Although "sectoral" ministries, many of the problems they address defy a simple sectoral approach (e.g., community forestry management, watershed management, integrated livestock and range management, etc.). Each of the ministries and their various departments have developed a number of programs over the years both with and without donor support.

Coordination among departments of the ministries and between central, district, and local initiatives is a critical issue, as is the need for the ministries to possess a strategic vision of their mission and how it contributes to the overarching national objectives expressed in GEAP. The IPC team found that almost everyone interviewed in the various ministries recognized the "value added" to their programs of GEAP policy guidance and the NEA framework, although this value was expressed more in general than concrete terms of how they may overcome problems that have arisen in the past. In general, it appeared that the clearer the vision for their department's program regarding natural resource management at the community level, the more they saw the value of the coordinated approach and policy direction of the Action Plan. This no doubt reflects the fact that their vision predates the GEAP and provided substantive contributions to its formulation.

Four characteristics of the situation at the ministerial implementation level stand out: i) there are numerous activities going on that fit within the objectives and strategies of the GEAP; ii) the ministries acknowledge they have limited human and financial resource capacity to articulate and implement national programs; iii) important donor projects provide a large share of operational funds, although their individual objectives and strategies have made it difficult to create coherent, permanent national programs; and iv) there is valuable pilot project experience in creating conditions for sustainable community resource

management, but a great deal remains to be understood and undertaken before this experience can be replicated on a level that would allow national-level impact.

Several current programs stand out in importance for supporting the goals of the GEAP and illustrate the kinds of activities underway and their relation to the institutional and policy goals of the Action Plan. The focus of the Gambian-German Forestry Project (GGFP), which has been operating since 1979, is community forestry management. This approach has evolved over the past several years to emphasize participatory consensus building leading to responsible village management of its natural resource base. The project initiated two pilot community forestry management schemes in 1991 in which communities with Forestry Department-approved forest management plans are exempted from paying license and other fees on forest products from areas under community management, and are allowed to retain the revenues generated from the sale of forestry products in a Community Development Account.

The recently initiated AID Agricultural and Natural Resources (ANR) Program combines project and non-project assistance to strengthen planning and implementation of several ministries in linking macro-level policies and program actions to create appropriate incentives for sustainable natural resource use and sustainable development. It addresses improving the policy and institutional framework that governs NRM in order to allow local communities to assume management control of, and benefit financially from, local land-based resources. The program contains components to strengthen policy analysis and formulation, and management of the ministries, as well as a grants program to strengthen the role of NGOs in working with communities to disseminate technologies and develop community resource management agreements (CRMAs). As in the case of the GGFP, the ANR program is designed as the pilot phase of a longer-term effort through which the system for addressing the natural resource priorities of local communities will be refined and appropriate methodologies for negotiating and implementing CRMAs will be developed. The "parent" ministry of the program is MNR, but a good deal of the program's support will be operationalized through the NRM working group and will benefit several ministries and the NEA.

The World Bank Agricultural Services Project targets improving capacity of the MOA to deliver services to local communities and will allow greater emphasis on natural resource issues and their linkage with agricultural production and family income stabilization. The MOA Livestock Services Department is responsible for programs relating to integrated livestock and range management, following the outline contained in the GEAP. The Department is supported by a UNDP Rangeland and Water Development Project, and has experimented over the past several years with local control over grazing resources to improve grazing management practices, reduce uncontrolled burning, and improve forage quality and quantity. It is also involved in a number of activities to increase family income through integrated livestock production and in experimental approaches to community or association self-financing livestock programs.

The MOA Soil and Water Management Unit (SWMU) had received AID support for many years and has adopted an integrated watershed management approach in several pilot

areas, working through local communities and NGOs. The communities develop land use plans with SWMU support and supply the labor component to complement SWMU management in preparing erosion control or anti-salinity structures, and in implementing agro-forestry interventions. These are by no means all the relevant ministry programs but they do provide an indication of the level of support for implementation at the ministerial level, and of the relation between the programs and the policy direction of the GEAP.

4. Local Level Activities

Many of the activities to be carried out at the local level will take place through programs of the line ministries. The Ministry for Local Government and Lands (MLGL) is responsible for local government administration and local-level coordination of government programs. The Gambia is divided into five divisions, each headed by a commissioner, appointed civil servant. All government agencies involved in rural development are represented in each division. Each division has an Area Council to collect revenues and taxes, and distribute aid. The divisions are further divided into districts. The Department of Community Development (DCD) of the MLGL has field agents assisting communities in self-help activities. At the village level village development committees (VDCs) are intended to serve as "entry points" for all development programs. The VDCs have an erratic performance record, although some have been effective in providing a local entity for NRM activities.

NGOs participated in the formulation of the GEAP and their comparative advantage is recognized in the document, particularly their close links with villages and a decentralized structure that facilitate grass-roots programming. Their role in implementing local-level projects, however, is admittedly not yet clarified. The GEAP discusses the need to improve government/NGO coordination, stating that the lack of coordination "remains an impediment to integrated environmental management" (p. 34).

There are approximately 100 NGOs in The Gambia, of which a small minority are active for most NGO activity. International NGOs have a long history in the country, and local NGOs have only recently begun to emerge. Most NGOs have focused on community services, such as health and education, and small-scale agriculture. Recently, however, several have become involved in NRM projects. Save the Children Federation (SCF) has supported pilot level development of community-based resources management plans to support increased food production, stem deforestation, and to arrest the loss of soil fertility working in collaboration with the Soil and Water Management Unit. Other examples include the work of Catholic Relief Services (CRS) in environmentally sound agricultural technologies through its work with local NGOs, such as the Gambian Rural Development Association (GRUDA) and the Association of Farmers, Educators, and Traders (AFET).

The ANR project emphasizes the use of NGOs to implement local level NRM projects, and includes a \$1.8 million fund for community level activities to be channeled through an NGO sub-grants program. The thrust of this program is experimentation through innovative approaches to community-based management of natural resources. Operations are to be refined as the experience progresses and there is an awareness--on both sides--of the

difficulties of using NGOs for this. There is a consensus, reiterated in the GEAP, that there is a role for NGOs in local level NRM activities. How these activities should relate to governmental programs remains to be worked out through the experimentation now underway financed by NGOs themselves and by the ANR project.

III. ASSESSMENT OF THE GEAP IMPLEMENTATION EXPERIENCE

The framework used in the IPC NRM studies identifies six characteristics associated with successful policy implementation. The following section examines the extent to which implementation of the GEAP meets these ideal conditions, followed by a discussion in Section IV of the key implementation issues arising from this analysis.

A. Specification and Consistency of Objectives

Ideal condition: The policy contains clear and consistent objectives, or some criteria for resolving conflicts.

As pointed out earlier, the purpose of the GEAP is to provide the overall framework and direction for environmental and natural resource policy. The formulation process emphasized the need for consensus-building and for reaching agreement on broad policy areas of highest priority. Other countries spent considerable time attempting to resolve conflicts over competing goals (e.g., Ghana), or specifying programmatic details (e.g., Madagascar), or even on the definition of the term "environment" (Lesotho). The Gambians preferred to formulate areas of broad policy agreement and set in motion the process for deriving specific programmatic guidance and policy development. This process necessarily limits the specificity of objectives, as illustrated by the broad statement on fiscal policy mentioned in endnote number 6.

The team's interviews revealed a high degree of consensus on the overall goals of the Action Plan, on the utility of an inter-ministerial coordinating body, and on the policy direction regarding some form of community resource management. There was less consensus on what "coordination" means and considerable vagueness on how best to achieve community-based resource management and the appropriate role of government in getting there. Some individuals appeared to ascribe more specificity to the GEAP than the document actually contains, but this specification is consistent with the broader policies it enunciates. There appears to be little conflict over interpretation of the general policy direction, the priorities indicated, or the general implementation structure. More disagreement is inevitable as implementation proceeds and most recognize the need for additional clarification of objectives, roles, and responsibilities.

B. Incorporation of Adequate Knowledge of Cause and Effect

Ideal condition: The policy accurately identifies the principal factors and linkages leading to, and influencing, policy outcomes, including specification of target groups and incentives.

This aspect is one of most challenging for implementation of the GEAP. The problems of environmental degradation, increasing population pressure and urbanization, unsustainable natural resource use are widely recognized. How the government can be intervene through appropriate policies and programs to create incentives for behavioral change leading to sustainable ecological and economic development is much less clear. The major policy issues and areas requiring further study are outlined in the recent preliminary draft of the Natural Resources Policy Analysis Agenda, developed by the MNR with support from the ANR project. These policy studies include such things as appropriate strategies for linking population, natural resources, and macroeconomic strategy; understanding the linkages between policies, regulations, and production and income options; understanding obstacles to implementing policy change at the divisional and local levels; and appropriating the experience of pilot project in developing effective resource management incentives.

A strength of the NEAP implementation process in The Gambia is the existence of a new project (of the USAID ANR Program) that supports relevant ministries in addressing these complex policy questions. The NRM policy analysis agenda, on the other hand, is limited to the limitations of present knowledge on the specific factors and linkages that influence achieving the Action Plan's goals of influencing widespread behavior change so that income and well-being of the population improve even as natural resource use becomes more sustainable.

C. Appropriate Implementation Structures and Processes

Ideal condition: Policy implementation is structured to maximize the probability of compliance from implementing agents and target groups. This includes assignment to capable and sympathetic agencies, supportive operating procedures, sufficient financial resources, and adequate access to supporters.

The issue of implementation structures and processes has received a lot of attention in the Action Plan and through the more recent creation of the NEA. It embodies the most critical institutional and management issues affecting implementation at the inter-sectoral coordination level, at the level of sectoral program implementation, and at the local community level.

1. Inter-sectoral Coordination.

The institutional arrangement involving NEA and its vertical and horizontal coordination mechanisms possesses a number of strengths. These may be summarized as follows:

a) The placement of NEA in the Office of the President provides a platform for inter-ministerial coordination and demonstrates the high level support and commitment from Government to tackle inter-sectoral issues.

b) NEA operations build on and support successful elements of the GEAP formulation process, such as the working group arrangement.

c) In terms of vertical linkages, the Agency is connected to the NEMC, the ultimate arbiter of policy and institutional conflict resolution; it balances this role with horizontal linkages through the working groups, the coordination of inter-sectoral technical service networks (environmental impact assessment and environmental information), and the environmental desk officers.

d) It is supported by several donor projects that will allow it build its capacity, provide services and resources to the line ministries, and gain credibility.

These strengths, however, are tempered by two inherent difficulties:

a) The operational definition of "coordination" inevitably looks different to the NEA and to the line ministries and other organizations whose programs are being "coordinated." There is a delicate balance between sharing information and resources, and in making certain that the individual parts contribute so that the whole of environmental policy implementation is greater than the sum of the individual sectoral programs. The existence of permanent working groups and other mechanisms should facilitate group pressure and support for the weaker members to contribute as agreed upon, but tension over the "interference" of NEA in ensuring that the process remains on track is likely.

b) NEA needs a highly qualified staff to gain credibility and be an effective voice for environmental issues. It does not now possess that staff contingent and it will be some time--perhaps several years--before it does. Although the need for building NEA capacity is recognized and funds have been provided for this purpose, the next several years will also be the most critical for it to gain credibility, demonstrate its utility to the line ministries, and produce initial results that justify its continued existence. Expectations are high and may be unrealistic.

Those involved in implementation of the GEAP are well aware of these difficulties. The consensus built up through the GEAP and the linkage arrangements between NEA and the line ministries, backed up by the placement of NEA in the Office of the President, offer about as good a scenario as is possible for the present state of implementation. Nevertheless, there has yet to be a truly difficult test case where conflict over policies or role and responsibilities is the major issue. The ideal situation would be to learn from a series of successful interactions over time that provide a pattern for resolving the more difficult issues when they do arise.

Several instances like this have occurred and the results have been positive. The problem of beach sand mining and the degradation that this caused to the beach front was recognized as a problem, but fell outside the purview of any ministry. The NEA took the issue and brought it before the NEMC, where a solution was worked out restricting beach sand removal and identifying an alternative (although more costly) mining site. A similar situation is developing with regard to pesticide management, where the role of an outside body to represent the interests of society--as opposed to the interests of vendors or even MOA--has become clear and the NEA has been assigned the task of coordinating (i.e., ensuring the functioning and compliance) of a pesticide management board.

2. Linkages at the Sectoral Implementation Level

The linkages described above relate primarily to the relationship between the N and the line ministries. The linkages among ministries and among individual ministry units are also critical. Each of the ministries involved has internal coordinating mechanisms to facilitate linkages among their departments and, as in all countries, some work better than others. The linkage between agricultural research and extension is internationally recognized as vexatious, even where it concerns the relatively limited domain of agricultural technology (relative to the complexities of many NRM and environmental issues). Difficulties of this nature are inescapable when dealing with complex policies involving multiple organizations.

Examples of intra-ministerial coordination mechanisms in The Gambia include the recent MNR decision to institute a Committee of Directors to coordinate activities and address cross-cutting issues of its four departments and planning unit. The most effective new linkage mechanism among the line ministries and departments will likely be the working groups.

The first meeting of the NRM working group met while the team was in The Gambia and it went well. The name was changed to "Agriculture and Natural Resource Management," as were the terms of reference to reflect the interconnectedness of agricultural and natural resource issues. As pointed out earlier, the working groups represent the institutionalization of the successful experience of GEAP formulation in providing a venue for continuous dialogue. In this area as well, some level of conflict over roles, responsibilities, and compliance is inevitable and should be seen as a sign of implementation progress. If no conflicts arise it may be an indication that little is happening or that the ministries involved do not regard the working group as an important forum for resolving issues over roles and responsibilities or for sharing information and resources.

The intersection of the coordinating mechanisms between NEA and the ministries among their technical activities is the most critical management issue for GEAP implementation, and is dealt with in greater depth in Section IV.

3. **Linkages at the Local Level**

Linkages at the local level are the most diffuse, the least clearly specified in the GEAP, and the most varied throughout the country's divisions and districts. Linking government activities at the local level should evolve from joint actions agreed upon at the ministerial level, supported by the Area and District Development Councils or other local bodies. Local level activities, however, involve non-governmental implementors as well, making the coordination challenge even greater.

The Ministry of Local Government and Lands, specifically the Advisory Council for the Coordination of NGO activities (ACCNO), has overall responsibility for coordination of NGO activities. ACCNO has a mandate to ensure that NGO activities are consistent with government objectives and priorities, and to review and endorse applications from NGOs. The GEAP states that NGOs should become involved in environmental management through "cooperative links" with the NEA and the other line ministries. NGOs will participate in the Agriculture and Natural Resources Working Group, for example, and at the group's first meeting it was decided that the Association of Non-Governmental Organizations (TANGO) will represent the NGO community. TANGO, established in 1983 but truly active only since 1991, is recognized by the government as the representing body for NGOs. It has over 50 members, including community level or cooperative groups in addition to NGOs. Although these bodies offer possibilities for coordination and linkages, the nature of community-level work and its incorporation into national programs makes their systematization inherently difficult.

D. **Management Capacity and Commitment**

Ideal Condition: Leaders and top managers possess sufficient strategic management and political skills, and are committed to the policy objectives.

As would be expected in any situation involving a wide variety of implementors, management capacity is uneven. The human resource base possessing managerial training (both formal and informal) is thin. There are a number of positive elements at work, however. NEA leadership has adopted an explicit strategic approach in recognizing the need to build a constituency and gain credibility of the line ministries and the public through performance, rather than approaching the task of coordination as if it were synonymous with control. In addition, management and leadership training are key elements of the short-term training in the NEA Strategy Plan. The challenge will be to institutionalize this currently personal vision within NEA once the staff is in place and the networks are functioning.

With notable individual exceptions, management capacity of the ministries is weak. Bureaucracies typically do not reward proactive leadership, and the most common approach is to react to problems as they arise. The formulation of the GEAP as a platform for action, the initiation of the NRM Working Group, and several other events provide an excellent opportunity for several ministries--particularly MNR--to take a more active leadership role. Support of the ANR program should also help through the design and implementation of a program budgeting system that will allow allocations and monitoring of programmatic

activities rather than simply as budget categories. It is hoped that successful MNR experiences can be replicated in the other collaborators.

The level of commitment appears much stronger. The importance attached to consensus-building and the participatory approach of the GEAP have established considerable commitment to the overall goals contained in the Action Plan. It is more difficult to judge the level of commitment to specific policies or to major changes in the way ministries work with each other or communities manage common resources. The lack of progress or the advent of conflicts could dissipate the commitment to the broader goals, but there is an important store built up through the formulation process that can be drawn on as implementation progresses to tackle more contentious issues.

E. Stakeholder Support and the Legal System

Ideal condition: The policy receives ongoing support from constituency groups and stakeholders within a neutral or supportive legal system.

Analysis of this factor in The Gambia is best undertaken in parts. Stakeholder support is strong from the President and the top government leadership, evidenced by placement of NEA in the Office of the President and government budgetary support NEA receives from donor commitments. This high level political support is a key element in GEAP success to date. Similarly, donor support is strong, not only for environmental programs in general but for the specific program the government established in the GEAP. Donor support is illustrated by the quantity and coordination of recent initiatives that fit within the framework provided, and target specific pieces to avoid overlap. Support from the line ministries towards broader inter-sectoral objectives may be more tenuous, but the strategy adopted by NEA of building a constituency through the provision of services valuable to the ministries and implementors should solidify and increase the support of these stakeholders.

The legal framework provided by the National Environmental Management Act is supportive of the goals and structures envisioned in the GEAP, and its current revision is a direct outcome of GEAP recommendations. The legal framework governing natural resource management and the incentives--or disincentives--it creates for sustainable natural resource management is less supportive. The GEAP identified an initial list of twelve laws relating to the environment that need revision. Existing laws and regulations frequently serve to exacerbate environmental degradation, particularly in the forestry sector where the benefits of conservation or more rational forestry utilization do not accrue to the communities. Creating a more conducive legal framework is a major component of the ANR project, working through the NRM working group.

F. Socioeconomic and Political Stability

Ideal condition: Socioeconomic and political conditions remain sufficiently supportive and stable so that the policy is not undermined by changes in priorities, conflicts, and/or radical shifts in resource availability for implementation.

In any developing country, socioeconomic and political conditions will reflect numerous tensions between growth and equity, rural and urban priorities, and other destabilizing effects of poverty and institutional weakness. In relative terms, however, there is considerable socioeconomic and political stability in The Gambia that facilitates implementation of the GEAP. The structural adjustment program, initiated in 1985, achieved its fiscal and monetary targets, stabilized the economy, and reversed its long-term decline. Management and protection of the environment were not addressed in the original structural adjustment program, but its successor, the Program for Sustained Development (PSD) contains explicit reference to environmental issues. The overall focus of the PSD is to generate sustained growth through market forces operating on the private sector to expand the economy's productivity. The PSD emphasizes attention to the problem of environmental degradation, with one of its resolutions being "To address the task of environmental protection, including the issues of solid waste disposal, deforestation and soil management, with renewed vigour and improved technology."

This mention of environmental issues in the country's development program is indicative of the perceived affinity between environmental and development problems mentioned earlier. The pace of per capita income growth has been very slow, however, and the absence of tangible improvements in the living standards of the majority of citizens have precluded the environment from becoming a high priority among many people who remain preoccupied with daily existence. Recent gains in growth are impressive, but the underlying economic base is shallow and largely dependent on events outside the control of the country.

The Gambia has experienced a high degree of political stability since independence in 1965, under the leadership of the President Sir Dawda Jawara. This continuity has generated a predictable policy environment. The priority the GEAP has received from the government is an example, and no major shifts in funding for implementing entities and their activities are foreseen. External assistance, whose levels have remained stable over the past several years, played a large role in the GEAP process and will be a key factor in implementation success. An influential economic and political factor beyond The Gambia's control is the tension involving the border with Senegal (which surrounds the country on three sides). The Gambia is particularly vulnerable to environmental problems that spill over from its neighbor or are carried down the River Gambia. Trade disputes, environmental waste agreements, and other international negotiations will have important implications for the GEAP strategy and goals.

These brief comparisons between conditions found in The Gambia and the ideal conditions that facilitate policy implementation reflect a generally positive context. There are a number of problems and the ideal conditions cannot be said to be met in any factor, but relative to the situation in many other African countries, the prospects for successful implementation of the Environmental Action Plan look cautiously optimistic. The analysis

also points to the key implementation issue of coordination and collaboration, discussed more detail below.

IV. THE KEY IMPLEMENTATION ISSUE OF COORDINATION AND COLLABORATION: INSIGHT AND LESSONS FROM PREVIOUS EXPERIENCE

The first responsibility of the IPC team is to accurately portray the GEAP formulation and implementation experience and attempt to extract lessons regarding what has worked and why. The second, and equally important, objective is to be useful to those involved in implementing the GEAP by shedding light on management issues, based on analysis of previous experience and the literature. Most, if not all, of the institutional and managerial topics covered are already recognized by the Gambians as important. The work and the insights that have gone into enhancing the prospects for successfully implementing the Action Plan are impressive. A spirit of cautious optimism was expressed by many of those interviewed as well as recognition that most of the actual implementation work remains to be done and that numerous problems, both foreseen and unforeseen, will undoubtedly arise. The comments in this section should therefore not be construed as authoritative statements on what GEAP implementors should be doing and are not, but rather as a synthesis of applicable management concepts that experience has shown to be critical, and an indication of some things to watch for as implementation proceeds.

A. Issues

1. Defining Coordination

The structure of the GEAP is a good example of what has been termed an "interorganizational implementation network" (Hjern and Porter 1981). The purpose of such networks is not merely to distribute tasks among collaborating units, but to link the projects of several organizations so that larger policy objectives are met that are beyond the reach of any individual organization. Rather than create a "super-ministry" or try to build committees to higher order objectives, the goal is to develop strategies and mechanisms that link individual agency commitments to the larger policy objective. In one way or another, even relatively small development programs must achieve coordination among a number of units, and this idea is not new. What is relatively new is the creation of a body like NEA and the linkages created by the GEAP in an attempt to tackle something as complex and inter-related as environmental policy, or changing the way natural resources are managed by impoverished communities where there are few if any slack resources. The Gambia is on the cutting edge of making this work.

The trick to making implementation networks function successfully is to achieve a balance between letting individual agencies operate independently so that they produce what they do best, and limiting their independence with supervision and control mechanisms so that what they produce fits into the larger picture as planned. The key element is coordination.

but as we have seen, "coordination" is often difficult to define in operational terms and looks different to those who are coordinating or being coordinated.

Experience has shown that a good way to think about coordination is in terms of three types of activities: information sharing, resource sharing, and joint action (Honadle and Cooper 1989). All three activities are contemplated in NEA sponsored activities and they offer excellent potential for providing mutual benefits. The information sharing activity will take several forms, from the simple interchange of information distributed through the working groups and desk officers, to the more complex environmental information network of the NEA. There are several critical aspects to watch for as implementation unfolds.

There is already a large volume of documents, reports, project papers, etc. that relate to present or planned activities. It will be critical that information overload is avoided or that information sharing does not degenerate into a "postal" function. One test of how well this coordination aspect is working will be the knowledge level and consistency of attendance of the working group members. The working groups must be useful to participants, and this may not happen unless those involved speak with authority and knowledge of what is going on in their departments. If the meetings do not lead to decisions and actions, a downward spiral could be set in motion where attendance becomes a low priority use of time for those with the most to contribute.

The same holds true for the selection of environmental desk officers. They should be selected and trained according to the importance of the function. There should be a considerable amount of information for them to act on within their home department or ministry. This concept worked well in Ghana and it could work here. If this function does not develop, after an appropriate start-up time, it may be an indication that information sharing is not achieving its coordination purpose.

The environmental information system of NEA is another vehicle for information sharing that will also provide an indication of how well coordination is progressing. The NEA will become the repository for much of the information and it will coordinate setting standards and procedures to minimize overlap and maximize compatibility of sources. The information function has to be a two-way street, however, and this should become a valuable service to the ministries, donors, the private sector, NGOs, and the public in general. A good test of how well the information sharing is proceeding will be the use made of the information at NEA, and NEA's ability to receive relevant data from the line ministries. This should be a relatively easy interchange to monitor in both quantitative and qualitative terms.

The resource sharing aspect of coordination is also evident, and offers opportunities for mutual benefits as well as good indicators of coordination. The NEA will soon have projects funded by the World Bank and GTZ that specifically target its institutional development, but that also provide funds administered through the Agency to support ministerial programs. In addition, UNDP and USAID projects that support a number of line ministries also target NEA activities. These donor projects all have well-defined project outputs, performance indicators, and reporting requirements and could provide good indicators of the (hopefully increasing) level of resource sharing. The GEAP is more than the sum of

donor projects identified in the Technical Cooperation Program, and adequate project performance is not synonymous with GEAP implementation. Nevertheless, the extent to which these projects expend funds that go toward inter-organizational activities will provide a good indicator of how effective coordination is in concrete, operational terms.

Joint actions represent the third aspect of coordination. A number of those interviewed emphasized the benefits of the GEAP participatory approach in allowing the chance to voice their opinions and inform others of what they were doing. This was so helpful even when the activities were carried out directly by the single department or ministry. Examples of true inter-ministerial joint action were harder to come by. The working groups should facilitate this process and its success will be a good test of the operationalization of "coordination." Joint actions represent a higher form of collaboration than many of the initial activities currently planned. The various departments are expected to each contribute their part, for example, to policy studies called for by the ANR working group and in the draft ANR policy agenda. Over time, more joint actions in the field should take place--if they do not, the reasons should be examined. Particularly important will be joint actions between MNR and MOA, between Livestock Services and the Forestry Department for example. If joint action does or does not develop over the next two years, we will say a great deal about the effectiveness of coordination.

In order for this type of coordination to operate, three inter-organizational problems must be overcome: threats to autonomy, lack of task consensus, and conflicting requirements from vertical and horizontal linkages. Implementation of Madagascar's NEAP relies specifically on coordinated actions between public units and private actors (a private agency to oversee the management of selected park reserves and NGOs). Threats to autonomy are a major problem, given the fact that the private sector field operators do not want their flexibility impinged upon by their public sector partners. Similar threats may surface between line ministries and the NEA, but a more likely place for this barrier to show up is between the role of NGOs or other local associations and the public sector organizations with which they collaborate.

Lack of task consensus is also most likely to be a problem as implementation works its way through to the local level. The working group arrangement and expanding joint actions should facilitate reaching consensus on what is to be done, for whom, and how it will be carried out. This again is an area of potential confusion that people are already aware of but it bears emphasizing. The high priority placed by GEAP participants on consensus-building and the participatory approach bodes well for continuing this method of operational action-level task definition, but care should be taken so that it remains an operational process.

There appear to be few examples of conflicting demands of vertical and horizontal linkages at this stage of implementation, perhaps due to the relatively few demands that horizontal linkages have placed so far on the vertically structured ministries. Compliance with NEA or working group requirements may generate friction of this nature, as will field-level actions that combine more than one ministry or organization. As implementation progresses, this will be an area where signs of conflict would indicate increasing coordination challenges.

and its absence would be a sign that not much joint action or shared responsibility is taking place.

2. Imposing Hierarchical Authority

A further management issue likely to develop is the prospect of demands for NEA to exercise authority to get things done. No one is "in charge" of GEAP implementation in the sense of being able to command compliance. The NEMC has this authority for the Government, but it will want to use this authority very judiciously, and even then it does not extend to the participants outside government. The implementation capacity and the interest in collaborating toward shared rather than individual organization goals varies considerably among departments, ministries, and different organizations outside government. This capacity and interest will affect the contribution of each partner and may create frustration as the weaker or less interested members slow group progress. There will be a natural tendency for some to want NEA to exercise some additional hierarchical authority to get things done. Experience has shown, however, that this is likely to fail and should be resisted. The backing of the NEMC is an important power base for NEA, but its true power will come from the credibility it builds up with the implementing agencies in creating situations where those who participate benefit their own organization goals even as they contribute to the wider objectives.

3. Clarifying Rules of the Game

The specification of operating rules and procedures will greatly aid in building these mutually beneficial relationships among implementors. The general and even many specific rules are spelled out in the NEMA and other legislation, but a great deal remains to be worked out. These rules and procedures include such things as the kind of decisions that the working groups may make and how they will be enforced; who is to pay for which activity out of which project where several benefit; what information is to be provided to whom at the ministries, the working groups, the NEA, and the desk officers; etc. Someone in The Gambia is, or soon will be, working on each of these. The important point to bear in mind is that everyone involved must be aware of what is agreed upon, they must come to expect that the rules will be followed, and there must be some form of sanctions applied for non-compliance.

4. Adopting Forward Looking Strategic Management

The importance of strategic management skills at all levels will be critical. The Executive Director of NEA demonstrates an impressive understanding of the need for building a constituency and establishing credibility with NEA stakeholders. The MNR has initiated a strategic planning process that should continue in 1994, and there are no doubt other examples of training or planning exercises that are developing these strategic management skills. The essence of a strategic management approach, however, is a forward looking orientation to anticipate what is likely to happen as things change. The day-to-day demands on all concerned with the GEAP are very high, especially at this stage of planning and capacity building. There is a danger that strategic thinking will simply be crowded out by the demands to keep up with immediate problems. There is currently a great deal for the

leadership to react to, without being proactive in anticipating future problems and shaping future capacity to respond.

It is still early in the implementation process and the NEA staff, for example, is yet in place. It will not be long, perhaps at the end of 1994, when it would be wise to dedicate time and resources to creating a strategic vision of where the process should be going and of the new problems it is likely to encounter, beyond the current three to five plans.

5. Coordinating NGO Activities

The intent to incorporate field level NGO activities into the broader implementation process is common to most NEAPs. Madagascar is perhaps the experience that has gone farthest in this regard, and its comparison to The Gambia may help clarify several issues. In Madagascar the National Charter for the Environment is analogous to the NEMA in establishing the legislative foundation for implementing its EAP. The Charter specifies that field level EAP activities would be carried out through contracts awarded to local NGO community groups.

To implement the Madagascar Action Plan, the government put in place several governmental mechanisms that were conditionalities for the multi-donor supported environment program. One of the mechanisms created was the National Association for Environmental Actions (ANAE), a non-governmental agency legally recognized as a private foundation. ANAE's mandate derives from the Charter, it has a nominal attachment to the agriculture ministry, and its financing comes from donor agencies. ANAE members include national and international NGOs, religious groups, and representatives of private business. Its main responsibility is the implementation of small integrated conservation and development projects through contracts with both private and public field operators, primarily NGOs. Additional donor funding was given to increase the implementation capacity of NGOs through the formation of an umbrella group of NGOs involved in development and environmental activities. The "Conseil des Organisations Non-Gouvernementales pour le Développement de l'Environnement (COMODE)" has a similar role as that assigned to TANGO for facilitating coordination, information exchange, and training among its members, and for serving as a recognized NGO representative.

ANAE's record with local-level implementation is considered highly positive, but with the formal status of NGOs in EAP implementation and the level of donor support, conflict has arisen over coordination and questions of how ANAE's demand-driven approach contributes to meeting EAP targets. For example, NGO response to expressed community needs has at times conflicted with the conservation priorities as established in the EAP. A larger issue has been how to link decentralized structures with central-level policy implementors; in other words, how to maintain program coherence without stifling local initiative, and how to meet planned targets without overwhelming nascent local capacity.

These problems are also present in The Gambia and there are lessons to be learned from successful aspects of the Madagascar NEAP/NGO experience. There are a number

major differences, however, that need to be kept in mind. The GEAP does not specify targets with the clarity of Madagascar's EAP (a positive point mentioned earlier). Neither the GEAP nor the NEMA provide a clear mandate for NGOs being assigned the role of field level implementation; and although Gambian NGOs have a recognized part to play, they do not have the institutional capacity nor are part of a formal structure such as ANAE. No one interviewed from government, donors, or NGOs advocated the creation of a similar arrangement in the Gambia. To do so would require a much clearer legal (NEMA and GEAP) mandate as well as considerable additional donor funding to enhance NGO institutional management and implementation capacity. This is not what is envisioned in the GEAP or even in the ANR project, which specifically targets experimentation with NGO implementation of local-level NRM initiatives.

The first point, then, is to recognize the differences between the situations, and see the Madagascar experience as an indication of what might be necessary if Gambian NGOs were to take on a similar role. Since that is not presently foreseen, it appears more productive to focus on coordination of NGO expertise within the existing framework and on institutionalizing lessons from the experimentation being carried out. The existing coordination mechanisms take NGOs into account (e.g., the Agriculture and Natural Resources Working Group) but it is likely that their integration will be more difficult since they lie outside normal government communication channels.

Care should be taken to ensure that NGOs receive "special" attention, even as they are part of "normal" coordination mechanisms and activities. For example, the use of environmental desk officers at several of the most involved NGOs would be a good idea, like those in the ministries and departments. Since these NGO staff are not part of the government structure and normal government operating procedures, they may require special briefing on how the communication links function, or other instructions so that they are fully incorporated into what otherwise constitutes a government coordinating mechanism. Similarly, TANGO can speak as the representative of NGOs, but it does not have hierarchical authority over its members such as the other working group members may have over their departments. How this influences the NGO role in the working groups should be taken into account in setting expectations and in making maximum use of NGO contributions.

B. Recommendations

The recommendations summarize the discussion above and are offered in the hope of helping GEAP implementors focus more clearly on potential problem areas they have identified.

- **Emphasize the concept of coordination and monitor its progress in concrete terms of information sharing, resource sharing, and joint actions among implementors.** A natural tendency may be to think of coordination in rather vague terms and to focus attention on the interaction between NEA and the line ministries. A more productive perspective would be to conceive of NEA's role as facilitating collaboration among the ministries and other players. The effectiveness of coordination would then be judged in terms of the more

visible (and quantifiable) interactions between implementors in information resources, and joint actions. This would also help retain focus on the key role of NEA in supporting mutually beneficial collaborative arrangements rather than on filling a new hierarchical authority role.

- **Clearly specify realistic annual performance targets for NEA for the next several years.** Expectations of donors, other ministries, and the public are high, perhaps unrealistically so given the capacity building stage that the Agency is in. It is important for NEA to demonstrate results to its stakeholders before the end of its Strategy Plan. There will undoubtedly be considerable progress to show before then, but it will be modest in relation to the kind of level of outputs that it will eventually be capable of. It is important that the progress be documented and evident to stakeholders and that performance be judged by what NEA can realistically be expected to produce in its initial years.
- **Periodically review how the process itself is working.** The participatory approach is relatively well-established among GEAP implementors. In addition, several studies and workshops are planned to analyze the results and replicability of pilot project experience in community resource management, for example, and other programs areas contained in the GEAP. It would be important also to review periodically how the process itself is proceeding, outside of more technical considerations. What do participants think about how the working groups are working, for example? What could be done to improve their effectiveness? The general acceptance of the need for dialogue and participation, and the demands on individual's and organization's time together with technical issues, may create a danger that this type of feedback will be lost. Setting up times specifically to discuss these questions, perhaps in the form of an annual review session, would be a way to ensure that this feedback is provided.
- **Make certain that as rules and procedures are developed they are adequately disseminated and understood by those involved.** A great deal remains to be worked out as implementation progresses. The NEMC has met twice, the Agriculture and Natural Resources Working Group once. NEA has only now advertised for two additional technical staff, expanding its current professional staff of three. Operational procedures and the rules of the game will evolve as these bodies begin to systematize their activities. For the process to be effective, people must be clear on roles and responsibilities, on the rules of decision making and approvals, and on how they will be enforced.
- **Pay attention to and make special arrangements for incorporating NGOs into existing coordination mechanisms, rather than attempt to create new coordination structures.** The role of NGOs in implementing the GEAP is important but limited relative to what has been tried elsewhere. Incorporating NGO experimentation into the larger implementation framework should

established function of the working groups, environmental desk officers, and other coordination activities sponsored by NEA.

- **A final recommendation concerns enhancing the role of the private sector.** This topic is not discussed above, partly because not much has happened to incorporate private sector actors into the implementation process. A number of NEA-coordinated actions will provide excellent opportunities well-suited for private sector participation, such as EIAs and other contracted studies. Current private sector capacity to carry out this type of consulting work is weak and must be created for the private sector to play this role. Possibilities include twinning arrangements with international consultants and allocation of training slots in project activities. All the other topics covered in the recommendations represent areas that GEAP implementors are working on; building the capacity of private sector partners so they may compete for carrying out GEAP activities is one that will require additional, specific attention.

V. LESSONS LEARNED

The experience to date in formulating and implementing The Gambia's Environmental Action Plan is positive and appears to offer an excellent base for achieving the intended policy outcomes. The GEAP experience also offers several general lessons regarding the development of NEAPs.

- The formulation process highlighted reaching consensus on broad national goals relating the environment to socio-economic development, rather than on resolving conflicting goals of conservation and development. This emphasis facilitated conclusion of a framework for proceeding, and established methods of operation for working out the remaining policy and programmatic details.
- The participatory process utilized during formulation was successful in getting participants on board and aware of the Action Plan. The use of seminars, workshops, and working groups allowed--and created expectations for--continuous dialogue that carries over into implementation.
- High level government commitment has been critical in the success to date, as evidenced by the placement of NEA in the Office of the President. This placement by itself does not resolve many issues, but it provides a visible platform for articulating national environmental interests and demonstrates the commitment of government to a policy framework that goes beyond the mandate of any single ministerial program.
- The balance of support (both government and donor) for the coordination function exercised by the NEA and for improving the capacity and effectiveness of implementation organizations appears to offer a solid basis for achieving broader inter-sectoral objectives. This balance should facilitate

collaboration, lessen conflicts over resource allocation, and enhance progr
carried out by both government and non-government organizations.

NOTES

1. The present study builds, in particular, on a document and literature review of NRM policy implementation issues in Africa (Brinkerhoff, Gage, and Yeager 1992) and a recent companion study of Madagascar's Environmental Action Plan (Brinkerhoff and Yeager 1993).

2. A framework for understanding all that is involved in changing natural resource management was developed by Weber (1991) for the Agriculture and Natural Resources division of the AID Africa Bureau. According to the five-level framework, actions (level I) such as project interventions should assist in establishing conditions (level II) so that improved natural resource management can take place. When the incentives are appropriate, people will adopt improved production practices (level III), leading to a richer biophysical environment (level IV), which allows for improved productivity and incomes (level V). The GEAP does not deal directly with all of these levels, but it does provide a policy framework that, to be successful, must create conditions so that all take place.

3. Excellent syntheses of environmental and NRM problems and issues can be found, for example, in the National Natural Resource Policy, Final Policy Document (1990), the AID Agriculture and Natural Resources (ANR) Program Assistance Approval Document (1992), and the Agriculture and Natural Resource Baseline Survey and Monitoring System for USAID/Banjul (1992).

4. This situation contrasts, for example, with the analysis of NEAP implementation in Madagascar where international pressure to preserve the unique fauna and flora of the island was seen as critical in initiating the process.

5. A poignant illustration of the physical and social effects of coastal degradation, attributed to excessive beach sand mining, is the deterioration of the beach outside of Banjul where a large cemetery is threatened with disappearance. Attempts to stop or retard the process by reinforcing the coastline with stones demonstrate the limitations of treating the effect rather than the cause of the erosion.

6. The brevity of the policy guidance provided by the GEAP is illustrated by the section on fiscal strategy--potentially one of the most contentious--which reads in its entirety,

The Government has at its disposal a number of fiscal measures that it can use to encourage the sustainable management of the environment by population. It will ensure that the policy objectives of the EAP are supported through a fiscal regime of taxes and tariffs, as well as appropriate levels of fines (p. 41).

7. The Gambia has a somewhat similar experience in the National Investment Board (NIB), which is responsible for coordination of cross-cutting private sector investment issues and is similarly housed within the Office of the President. The experience with the NIB, although of a clearly different technical nature, is considered positive by both the government and private sector.

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