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UGANDA AND THE NATIONAL ENVIRONMENTAL ACTION PLAN: FOCUSING ON IMPLEMENTATION

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**Contractor Team:
Management Systems International (Prime Contractor)**

Abt Associates Inc
Development Alternatives Inc
Deloitte Touche Tohmatsu
Institute for Development Research

Institute for Public Administration
International Resources Group
Research Triangle Institute

Search for Common Ground
State University of New York at
Albany
University of Pittsburgh

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Derick W. Brinkerhoff
and
Benjamin N. Kamugasha

Implementing Policy Change Project

TABLE OF CONTENTS

ACKNOWLEDGEMENTS		iii
LIST OF ACRONYMS		iv
I	INTRODUCTION	1
	A Study Purpose and Objectives	1
	B Study Methodology	1
	C Overview of the Report	2
II	UGANDA AND THE NEAP	2
	A Uganda the Economy and the Environment	2
	B The Story of the NEAP Process	3
	1 Pre-NEAP Environmental Planning	3
	2 NEAP Preparation	4
	C Implementing the Neap Experience to Date	7
	1 Resources for Action Donor-Supported Efforts	7
	2 NEMA From Start-Up to Operations	8
	3 Coordinating Multiple Actors	12
	4 Biodiversity and Local-level ENR Management	13
	5 Progress with Decentralization	14
III	ANALYSIS OF THE NEAP EXPERIENCE	16
	A Clarity and Consistency of Policy Objectives	16
	B Validity of the Policy Prescriptions	17
	C Facilitative Implementation Structures and Procedures	19
	1 Central-level Implementation Structures	20
	2 Local-level Implementation Structures	21
	D Appropriate and Sufficient Capacity	23
	E Stakeholder Support	25
	F Supportive Socioeconomic and Political Conditions	27
IV	IMPLEMENTATION CHALLENGES	28
	A Setting Priorities, Sequencing Actions, Avoiding Crisis Management	29
	B Maintaining Resource User Participation and Stakeholder Support	30
	C Managing Interorganizational Linkages Across Sectoral Boundaries	32
	D Coping with the Evolution of Neap Implementation Strategically	33
	E Dealing with Resource Constraints and Financial Sustainability	34

V	CONCLUSIONS	36
A	Next Steps for Uganda's NEAP	37
	1 Legal and Regulatory Development and Refinement	37
	2 Capacity-Building	37
	3 Organization and Procedures	37
	4 Sustainability	38
B	Issues for the Future	38
	1 Maintaining ENR as a Policy Priority	39
	2. Decentralization and ENR	40
	3. Democratization and ENR Policies	41
	ENDNOTES	41
	BIBLIOGRAPHY	44

ANNEXES:

- Annex A IPC Analytic Framework
- Annex B Persons Contacted
- Annex C NEMA's Role and Functions

3

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LIST OF ACRONYMS

ADB	African Development Bank
APE	Action Program for the Environment
DANIDA	Danish International Development Agency
DCU	District Coordination Unit
DEAP	District Environmental Action Plan
DEO	District Environment Officer
DEC	District Environment Committee
DENIVA	Development Network of Indigenous Voluntary Associations
DTC	Development Through Conservation
EIA	Environmental Impact Assessment
ELU	Environmental Liaison Unit
EMCBP	Environmental Management Capacity Building Project
ENR	Environmental and Natural Resources
FAO	Food and Agriculture Organization
GEF	Global Environment Facility
GMU	Grants Management Unit
ICDP	Integrated Conservation and Development Project
IDA	International Development Authority
IPC	Implementing Policy Change Project
IUCN	World Conservation Union
JEEP	Joint Energy and Environment Projects
LEAP	Local Environmental Action Plan
LEC	Local Environment Committee
LVEMP	Lake Victoria Environment Management Programme
MBIFCT	Mgahinga and Bwindi Impenetrable Forest Conservation Trust
MEP	Ministry of Environment Protection
MNR	Ministry of Natural Resources
MTWA	Ministry of Tourism, Wildlife, and Antiquities
NEAP	National Environmental Action Plan
NEMA	National Environment Management Authority
NCS	National Conservation Strategy
NGO	Non-governmental Organization
NORAD	Norwegian Agency for International Development
NRM	National Resistance Movement
PAMSU	Protected Areas Management and Sustainable Use
PPF	Project Preparation Facility
PRA	Participatory Rural Appraisal
SFI	Sustainable Financing Initiative
SPAAR	Special Program for African Agricultural Research
TECCONILE	Technical Cooperation for the Promotion of Development and Environment Protection of the Nile Basin
UNDP	United Nations Development Program
UNEP	United Nations Environment Program
UNIDO	United Nations Industrial Development Organization



UNP	Uganda National Parks Authority
USAID	United States Agency for International Development
UWA	Uganda Wildlife Authority
WEMEP	Ministry of Water, Energy, Minerals and Environment Protection
WWF	World Wide Fund for Nature

6

I. INTRODUCTION

African countries and the international donor community have invested heavily in environmental and natural resources (ENR) planning. The predominant planning framework across the continent is the National Environmental Action Plan (NEAP). About 40 countries have undertaken or are in the process of preparing NEAPs (see Greve et al., 1995). To achieve impacts, however, plans must be successfully translated into results. This calls for paying attention to implementation needs and capacities.

A. STUDY PURPOSE AND OBJECTIVES

USAID/Washington's Africa Bureau has sponsored a multicountry study of environment and natural resources (ENR) policy implementation, focusing mainly on NEAPs. The purpose of the investigation is to increase understanding of ENR policy implementation so as to a) design policies that can be more successfully implemented, and b) develop better approaches to ENR policy implementation. This study is a product of USAID's Implementing Policy Change Project (IPC 2), which provides technical assistance and undertakes applied research on policy management and institutional issues across a broad range of sectors. Research fieldwork began in 1993. Since then five country case studies have been completed, using a common analytic framework that focuses on a) the policy prescriptions and the policy framework, b) implementation structures and procedures, and c) features of the setting in which the policy is implemented. The cases conducted to date are Mali's forestry policy, Madagascar's NEAP, The Gambia's NEAP, Botswana's NCS, and Zimbabwe's reform of the Parks and Wildlife Department and of the Forestry Department (see Brinkerhoff with Honadle, 1996). This assessment of Uganda's NEAP experience is the sixth case in this ongoing series.

B. STUDY METHODOLOGY

The study examines the extent to which Uganda's NEAP implementation experience fulfills six conditions associated with successful policy implementation (see Annex A). It then explores the implications of five implementation challenges that Uganda's NEAP needs to confront: a) setting priorities, sequencing actions, avoiding crisis management, b) maintaining resource user participation and stakeholder support, c) managing interorganizational linkages across sectoral boundaries, d) coping with the evolution of NEAP implementation strategically, and e) dealing with resource constraints and sustainability.

The study methodology combined interviews and field visits with document analysis and literature review. In-country fieldwork took place during the period August 7-30, 1997. Besides conducting interviews in Kampala and Entebbe, the team visited four districts: Kabale, Mbale, Mbarara, and Tororo. Annex B contains a list of persons contacted. The team's initial findings and impressions were presented to senior staff of the National Environment Management Authority (NEMA) and USAID/Kampala at two debriefings in late August. The draft report was written during September-November, and presented at a review workshop in Kampala, hosted by NEMA, in December. The report was finalized following the workshop.

C. OVERVIEW OF THE REPORT

After the introductory section, in Part II the report begins with a brief overview of Uganda's economic and environmental situation, and then recounts the story of the NEAP preparation. It then reviews implementation experience to date. Part III analyzes that experience using the analytic framework applied across all the cases in the larger study. In Part IV, the report discusses the implementation challenges listed above. The concluding section, Part V, offers some recommendations and summary thoughts.

II. UGANDA AND THE NEAP

A. UGANDA: THE ECONOMY AND THE ENVIRONMENT

Uganda, with a population of about 19.5 million, is one of the poorest countries in the world. Once among the healthiest economies of the region, Uganda suffered over 20 years of economic mismanagement, dictatorship, political upheaval, civil strife, and violence. During the 1970s and 80s, successive waves of turmoil and conflict dealt devastating blows to Uganda's economic, social, and physical infrastructure (see Khadiagala, 1993). By the mid-80s, thousands of citizens had been killed, many of the best educated had fled overseas, government and the civil service barely functioned, the formal economy was at a standstill, and most people eked out a living in subsistence farming and/or informal economic activity. In 1986, with the coming to power of the National Resistance Movement (NRM) under President Yoweri Museveni, Uganda's fortunes took a turn for the better.

The NRM government began to undertake, with the help of the multilateral assistance agencies and various bilateral donors, a package of broad reform initiatives: currency, pricing, and other macro-economic reforms, institutional rebuilding and civil service reform, anti-corruption efforts, plus infrastructure and sectoral investment (see Brett, 1994). These efforts have borne fruit with dramatic results. Inflation has been brought under control, production and export earnings have increased, domestic security has improved, foreign investment has grown, and tourism has returned. Estimates place annual real economic growth rates in the five to seven percent range. Much remains to be done to repair the ravages of the recent past, to raise the income levels of the rural poor majority, and to deal with ongoing security problems, but the signs of progress have made the late 90s a hopeful period for Uganda. With the positive sociopolitical and economic trends underway in Uganda likely to continue, there is reason to be optimistic about the country's future and its ability to reclaim its reputation as the "Pearl of Africa."

Like many countries in Africa, Uganda's natural resource base is critical to its economic well-being. About 54 percent of the Gross Domestic Product and nearly 100 percent of export earnings-- coffee, tea, tobacco, and cotton-- derive from natural resources. Over 80 percent of the labor force is employed in agriculture, consisting mainly of small-scale subsistence farmers totally dependent upon natural resources for their livelihoods. Uganda also contains a wealth of biodiversity, the mountain gorilla being the most famous exemplar, and spectacular natural beauty in world-renowned national parks such as Murchison Falls, Queen Elizabeth, and

Rwenzori Mountain Uganda's social, political, administrative and economic collapse subjected the country's natural environment to considerable pressure and increased degradation Forest reserves were encroached upon by pit-saw operators, fuelwood gatherers, and agriculturalists, leading to increased deforestation Wildlife in national parks and game reserves was decimated by poaching The breakdown in enforcement of land-use regulations and agricultural practices led to overgrazing from sedentary pastoralists' cattle herds, soil erosion from failure to terrace hillsides and to allow for fallow periods, and destruction of wetlands from expansion of paddy rice production and horticulture¹

The reestablishment of social order and the reimposition of some ENR regulation have curbed some of the most extreme environmental depredations However, much of the pressure on the resource base has continued or increased Reliance by the poor on fuelwood for cooking and heating is ongoing In the mountainous regions of southwestern Uganda, soil erosion worsens due to poor agricultural practices, land fragmentation (a function of inheritance systems), influxes of refugees, and cattle grazing Conflict between wildlife and residents in park and protected area buffer zones remains a problem The recent increases in economic growth and new investment are also contributing to ENR degradation Industrial and urban pollution and stress on wetlands and rivers are growing at a rapid rate The sustainability of Uganda's economic take-off will ultimately depend upon reducing the incidence of ENR depletion and damage

B. THE STORY OF THE NEAP PROCESS

The story of Uganda's NEAP preparation process can be divided into two phases The first one concerns earlier environmental planning initiatives that predate the NEAP, but which laid the groundwork that the NEAP process built upon The second phase relates to the development of the NEAP over a several-year period, culminating in the preparation of the NEAP document, the drafting of the Environmental Statute, and the elaboration of an investment program to launch the NEAP into implementation

1. Pre-NEAP Environmental Planning

The origins of the NEAP can be traced back to the early 1980s when a mission from the World Conservation Union (IUCN) visited Uganda to propose designing a National Conservation Strategy (NCS) With funding from the United Nations Environment Program (UNEP), IUCN undertook design work for the NCS in 1983, and provided a resident advisor in 1984 to facilitate the preparation process An earlier IUCN/UNEP effort, the World Conservation Strategy, formulated in 1980, provided the point of departure for the NCS Civil unrest interrupted the finalization of the NCS, with the IUCN advisor leaving prematurely in August 1985 The NCS document was relatively complete, but further action was shelved Several months later, in 1986, the NRM Government came to power, and began to take steps to restore a basic level of stability to the country

Among the priorities of the new government was the environment In its first year in power, it established a Ministry of Environment Protection (MEP), placing Uganda among the very first sub-Saharan countries to create a full-fledged ministry devoted solely to environmental issues

This was a departure from the proposal in the NCS, which advocated setting up a small environment secretariat in the President's Office. The NRM Government initiated contact with members of the international donor community. From IUCN, it requested support for wetlands management training and for some pilot forestry activities. Other donors stepped in, supporting specific ENR projects. For example, USAID funded biodiversity protection through CARE and WWF, and the European Commission and NORAD financed forestry rehabilitation.

Enthusiasm for the NCS waned during this period. The NRM Government and the MEP staff felt that the NCS was too narrow in scope and placed too much emphasis on "green" issues. It failed to address conservation and development linkages adequately and lacked a pragmatic action plan on which implementation could be based. In September 1986, the NCS process was formally terminated. The government was searching for the elements of a strategy capable of addressing policy reforms, supporting institutional arrangements that would establish firm and pragmatic linkages between the top and bottom levels of government, encompassing the broad-based popular participation that the NRM was institutionalizing through its decentralized resistance council framework, and combining development and conservation objectives (see Johns, 1989).

As part of this search, UNEP supported an extensive analytic exercise, termed Strategic Resources Planning, that inventoried and analyzed ENR problems, issues, and potential solutions. This resulted in a ten-volume report (UNEP, 1988). At the same time as the UNEP consultants were conducting their studies, the institutional arrangements for ENR planning and management created by the government were in turmoil. The bureaucratic problems of establishing a line ministry to deal with cross-sectoral environmental issues became more and more acute. Horizontal coordination, a central function in environmental management, was particularly difficult. Further, MEP operations were interrupted by frequent replacements of its senior officials. Between 1986 and 1989, MEP had three changes of ministers and three different permanent secretaries. This high turnover affected internal MEP institution-building, cross-sectoral relations, and policy development in an already complex sector. The ministry was scrapped and became part of the Ministry of Water, Energy, Minerals and Environment Protection (WEMEP) in 1989.

Outside of Uganda during this same period of the late 1980s, the World Bank started carrying out environmental planning missions in sub-Saharan African countries whose main purpose was to introduce and initiate the strategic environmental planning frameworks known as NEAPs. Mauritius, Lesotho, Seychelles and Madagascar were among the first countries to launch NEAP preparation. World Bank discussions with the Ugandan government on the NEAP started in 1990.

2. NEAP Preparation

By 1991 the Uganda NEAP preparation process had begun. The World Bank-initiated effort was able to capitalize on the earlier analytic work of the NCS and the UNEP studies. These were important building blocks for the NEAP's formulation.² A NEAP Secretariat was set up in the WEMEP, and nine task forces were established. Task force members included government officials, staff of universities and research institutes, NGOs, and private sector representatives,

both Ugandan and international The sectoral task forces, which started work in November 1991, covered the following areas

- 1 Environmental policy, legislation and institutional arrangements,
- 2 Environmental education, research and human resource development,
- 3 Land management, agriculture, livestock and rangelands,
- 4 Aquatic biodiversity, wetlands, water and water resource,
5. Terrestrial biodiversity, forestry, wildlife and tourism,
- 6 Mining, industry, hazardous materials and toxic chemicals;
- 7 Population, health and human settlement,
- 8 Energy and climate change, and
- 9 Environmental information

The NEAP process was designed to incorporate the views of a wide range of actors through a sequence of analysis and participatory review sessions, leading to revisions and modifications. The process followed a series of distinct steps

- 1 Definition of the principal environmental issues and problems, preparation of topic and issue papers to analyze causes and make recommendations,
- 2 Compilation of a first draft by the NEAP Secretariat from the work of the task forces,
- 3 Review of draft recommendations through local, regional and national seminars leading to new draft,
- 4 Review of the draft NEAP by an international conference,
- 5 Final review and revisions and presentation to government for approval, and
- 6 Government approval and action planning on policies, legislation, and institutions

The task force papers were presented at nine regional workshops between July and September 1992 in order to obtain comments and feedback in the light of local experience. The workshops' participants, who were drawn from 36 of Uganda's then 38 districts (the number of districts has since increased to 45), included local leaders, government department officials from the district and regional levels, NGO representatives, resource users, and women representatives. Each regional workshop lasted three days and involved at least 100 participants. These meetings were chaired by local officials to ensure that their direction reflected local needs and perceptions. In addition to the regional workshops there were two one-day presentations by the NEAP task forces and Secretariat staff to Commissioners (department heads in Government ministries) and also to Members of Parliament and the President. The policy component of USAID's Action Program for the Environment (APE) provided significant support to the NEAP debate and consensus-building process.

Once the feedback from the regional workshops had been incorporated in revised papers, a National Conference was held in November 1992. This was opened by the President and attended by 400 representatives of international donors, NGOs, the business sector, youth groups, women's groups, resource users, academics, and government staff at central ministry and district levels. The NEAP and an accompanying Investment Programme were drafted in accordance with the discussions and reflected input from the regional workshops and National Conference discussions.

In 1994 a draft NEAP document was submitted to the Cabinet for consideration. The document contained detailed background information on the country's state of environment. Its chapters went on to define a broad ENR policy framework, covering policy goals, objectives and environmental principles, and to elaborate sectoral strategies, with accompanying legislative and institutional reforms. The document also proposed a comprehensive action plan in which an investment program and implementation strategy were carefully defined. The policy framework component of the NEAP was published in a separate document, along with summaries of the cross-sectoral policies. The NEAP document was formally approved by the Cabinet in 1995. Box 1 summarizes the NEAP's policy objectives.

A National Environment Statute was enacted in May 1995, which provided the official legislative mandate for the policy intentions elaborated in the NEAP. The statute creates a number of entities ranging from the central to the local level designed to orchestrate implementation of the NEAP. At the government's institutional apex, the Statute creates a Policy Committee on the Environment, chaired by the Prime Minister, to facilitate government-wide coordination and assure access to, and support from, top-level policymakers. Its membership consists of ten ministers whose portfolios have an important bearing on environment.

Box 1: NEAP Objectives

Overall Policy Goal To achieve sustainable social and economic development which maintains or enhances environmental quality and resource productivity on a long-term basis that meets the needs of both present and future generations.

Specific Objectives

- Enhance health and quality of life for all Ugandans through sound ENR management
- Integrate ENR concerns into policies, plans and programs at national and district levels with popular participation
- Conserve, preserve, and restore ecosystems, including national biodiversity
- Optimize resource use and sustainable resource consumption
- Raise public awareness and understanding of ENR and development linkages
- Ensure participation in ENR activities

The Statute establishes the National Environment Management Authority (NEMA), linked to the Policy Committee through a Board of Directors and the Ministry of Natural Resources (MNR, created in 1994 as part of a government restructuring).

Extending beyond the central level, the Environment Statute pays particular attention to linking national level planning and activities with those at the district and sub-district levels. This focus is a defining feature of the NEAP, and derives from the government's commitment to participatory decentralization.³ Uganda's 1993 decentralization law informed the design of the

12

Environment Statute At the district level, the Statute calls for the establishment of a District Environment Committee (DEC) charged with district-level coordination of ENR plans and activities, integration of ENR concerns into development plans and projects, formulation of ENR by-laws, and environmental monitoring and information dissemination Districts are directed to appoint a district environment officer (DEO) to assure the functioning of the DEC Further, at the sub-district level, Local Environment Committees (LECs) are mandated, with functions related to planning, environmental education, community mobilization and ENR monitoring

The Statute sketches out a rolling process of ongoing environmental planning and action, whereby the NEAP is reviewed and updated every five years. DECs are to prepare and/or revise district environmental action plans (DEAPs) every three years, and LECs can prepare local environment workplans (timeframe unspecified) that are consistent with the NEAP and the DEAPs. Thus the enabling legislation lays the groundwork for a decentralized and participatory NEAP implementation modus operandi that, in principle, both harmonizes ENR actions across levels and allows for district and local adaptation to particular conditions and needs

At the hub of this institutional framework is NEMA The design of NEMA reflects the cautionary experience of the earlier MEP, disbanded in 1989, as well as that of other African countries in establishing an environmental lead agency Uganda's NEAP seeks to create an agency that enjoys high-level support and supra-ministerial clout while avoiding bureaucratic isolation and disjointed intervention Its institutional "spokes" reach vertically upward to the Board of Directors and the Policy Committee on the Environment, downward to the DECs and the LECs, and extend horizontally outward to sectoral ministries and other public agencies through entities called Environmental Liaison Units (ELUs), and beyond the public sector to NGOs, private firms, and international agencies NEMA's mandated functions blend policy formulation and strategy development, cross-sectoral policy and program coordination, public education and awareness building, regulatory standards development and enforcement, and ENR monitoring and reporting⁴

C. IMPLEMENTING THE NEAP: EXPERIENCE TO DATE

Moving the NEAP from plan to implementation posed the immediate problem of financial and human resources The NRM Government, struggling to relaunch Uganda's ravaged economy and to put in place the minimal government structures necessary to reinitiate growth, was in no position to fund NEAP activities from its own meager sources Ugandan officials appealed to the international donors to extend the support they had provided during the NEAP planning phase to cover implementation

1. Resources for Action: Donor-Supported Efforts

The NEAP investment program is divided into five thematic areas In descending order of priority these include capacity building in environment management, enhancing resource productivity, management and use of biodiversity, environmental education and awareness, and environmental health and pollution management Under each of these areas the NEAP Investment Program Working Group, with input from the technical working groups and the results of district questionnaires, identified a set of priority and reserve projects, with rough

funding estimates. In a sense, some NEAP activities were already being implemented with donor funding during the preparation of the Plan. USAID's APE provided important support for ENR management capacity building beyond its assistance to the NEAP Secretariat, the program worked on institutional development for the Uganda National Parks agency as well. Donors also supported activities related to biodiversity. These focused on biodiversity protection in protected areas and park buffer zones, and included a number of integrated conservation and development projects (ICDPs), mainly financed by USAID's APE Grants Management Unit (GMU) and a couple of the Nordic country donor agencies, and implemented by NGOs.⁵ These and other ICDPs have continued throughout the NEAP implementation period.

According to one estimate, donor and counterpart funding for the NEAP for the period 1996-2001 amounts to approximately \$35 million per year (Swartzendruber, 1996). Apart from USAID, the major donor that has supported the transition from planning to implementation is the World Bank, through several projects. The Environmental Management Capacity Building Project (EMCBP) supports NEMA and decentralized activities in six pilot districts (see II C 2 below). The UNDP supports NEMA work in two other districts. Besides the EMCBP, the World Bank and the Ugandan Ministry of Tourism, Wildlife, and Antiquities (MTWA) are developing a large project, Protected Areas Management and Sustainable Use (PAMSU), with total funding of nearly US\$107 million over five years. PAMSU has three major components: management of protected areas and biodiversity conservation, which includes rehabilitation of national parks, institutional development for the Uganda Wildlife Authority (UWA), and buffer zone community co-management mini-projects, promotion of environmentally sustainable tourism which focuses on capacity-building from the central to the local levels, and institutional strengthening of the MTWA. Preliminary activities began through a Bank Project Preparation Facility (PPF), which included a significant amount of redesign work following the recommendations of a mid-1996 pre-appraisal team to scale PAMSU back and sequence investment in phases. An appraisal mission was scheduled for spring of 1997, but was suspended in the wake of the discovery of financial malfeasance within UWA and the removal of its director.

Over the past year or so, NEMA has engaged in discussions with donor representatives regarding funding for the projects contained in the NEAP investment program. The table on the following page summarizes by thematic area those NEAP Investment Program projects for which funding has been secured or appears likely.

2. NEMA: From Start-Up to Operations

As a starting point, if the NEAP was to yield results on the ground, it was critical that funds be available to make NEMA operational. USAID, through APE, stepped forward with bridging funds for the transition from the NEAP Secretariat to NEMA start-up. During that period, the World Bank developed the EMCBP, which has made available an IDA credit of US\$11.8 million and US\$3.4 million in government counterpart funds for NEMA and NEAP activities over a five-year period (see World Bank, 1995a).

The project has two major components. The first focuses on national-level capacity building and finances NEMA's establishment. This includes operating and maintenance costs, vehicles and

equipment, staff salaries, and some support for specific studies. The intent is that over the life of the project, the government will progressively assume an increasing proportion of these expenditures. The second component addresses capacity for coordinated and linked action from the central to the local levels. Activities are targeted on six focal districts, and involve institutional strengthening and operational support for DECs, training for sustainable ENR management at all levels, and local-level ENR micro-project formulation and implementation.

NEMA began operations in January 1996 with a small core of staff drawn from the team that had worked on the NEAP design in the Secretariat. Most NEMA staff joined the organization in the spring of 1996. NEMA has 51 staff slots, of which 46 are currently filled. It has 26 professional staff positions. NEMA suffered the growing pains that afflict any organizational start-up, aggravated by the high expectations for immediate performance and quick results, and by the ambitious nature of its wide-ranging mandate. These types of start-up problems have included, for example, differing perspectives from staff who were part of the earlier secretariat the NEAP planning process versus new hires, leading to diverging views on what NEMA should be doing, difficulties in sequencing activities, and related issues of establishing and sticking to priorities, pressures of responding to the World Bank's requirements for EMCBP, dealing with staffing gaps and vacancies, unfamiliarity of new staff with the details of the Environment Statute, and the junior status of many NEMA staff relative to "old timers" in the civil service, thus putting them at a disadvantage in inter-ministerial interactions.

Internally, the Authority is divided structurally into four divisions and one unit, overseen by a top management office. The Executive Director's Office contains the executive director, his deputy, and the district support coordinator, who heads the District Coordination Unit (DCU). The DCU handles NEMA's links to districts and local governments. NEMA's divisions include the Planning, Policy and Legal Division, which integrates environmental concerns into development planning and policies, and deals with legal and regulatory issues, the Information and Monitoring Division, the largest unit in NEMA, which provides the Authority's reconnaissance, surveillance, investigation and control functions, the Education, Awareness and Training Division, which is charged with promoting environmental awareness among Uganda's citizens and with building necessary skills, and the Finance and Administration Division, which is responsible for logistics, personnel, procurement, and accounting.

Because of NEMA's extended organizational "spokes," the transition to implementation has confronted both district-level and central ministry capacity issues. The decentralization law allocates responsibility for hiring and paying civil servants to the districts, which includes DEOs. While some districts have moved ahead on their own to hire DEOs and to create DECs, almost all districts face serious resource shortages, both human and financial. To avoid adding to their salary burden, many districts have added the DEO functions to an existing position, the most common combination being a Health and Environment Officer. Since the DEOs are intended to serve as the key linkage to NEMA from the districts, how individual districts deal with the DEO position is important to how successfully NEMA can perform its functions at that level.

Besides staff shortages, districts have faced financial and physical resource shortages that have limited their ability to implement NEAP activities and the terms of the statute. Adequate office space and equipment, plus access to a vehicle and funds for gasoline and travel have posed

critical constraints. There has been a sharp distinction between the resources available to EMCBP and UNDP pilot districts and districts in the rest of Uganda that do not have the possibility of external funding. District-level NEAP activities have begun gradually in the pilot districts and most have taken only a few steps, the main one being the conduct of participatory rural appraisal (PRA) training and the subsequent identification of local-level mini-projects.

The ELUs are NEMA's horizontal linkages, and are basically dependent upon the capacity and resources of the agency where they are located to make them operational. Currently, 21 ELUs have been established, the smallest consisting of one person, and the largest seven people (of which there are four), with an average size of four. Most of the agencies have requested NEMA funds from the EMCBP to pay for some of the costs of operating the ELUs, such as office supplies, sitting fees, training, and any required studies.

Despite its growing pains and some external criticism, in its first year of operations NEMA has moved ahead on a number of fronts (see NEMA, 1997). Regarding capacity-building, NEMA has undertaken training for DECAs in focal districts, assistance with PRAs, local-level training needs assessments, and ELU staff training. Progress has been made on the development of draft standards and guidelines for environmental impact assessments (EIAs) and the establishment of interagency EIA committees, support to districts on EIAs, and conduct of 30 EIA reviews. NEMA legal staff have worked on environmental regulations and by-laws, on changes in supporting legislation, for example, the Wildlife Statute and the National Wetlands Policy, and on Uganda's compliance with international conventions. In the area of environmental awareness, NEMA has developed a strategy for environmental education jointly with the education ministry, initiated a mass media campaign on environmental issues, updated the 1994 State of the Environment report and is about to publish the SOE 1996 report, held public hearings on the water hyacinth problem in Lake Victoria, conducted spot publicity campaigns against polluters (cement factory and urban garbage), and started publication of a NEMA newsletter.

Regarding environmental monitoring, NEMA's Information and Monitoring Division can point to the following accomplishments: monitoring indicators developed, library computerized, links to UNEP website established and a NEMA homepage set up, database of polluting industries in Kampala and Mbarara created, and factory inspections conducted.

Table 1: NEAP Investment Programmes

Projects	Funding Levels Donor plus GOU (US\$)	Donors	Status
<p>Programme 1 ENR Management Capacity-Building</p> <p>1 Establishing NEMA (EMCBP)</p> <p>2 NRM Decentralization</p> <p>3 Policy & Legal Review</p> <p>4 Env Protection Standards & Guidelines</p> <p>5 Institutional Support to NEMA</p>	<p>11 8m + 3 4m</p> <p>TBD</p> <p>0 31m</p> <p>5 0m/ 03m</p> <p>0 87m</p>	<p>World Bank/IDA</p> <p>USAID</p> <p>TBD</p> <p>UNEP/UNDP</p> <p>UNDP</p>	<p>Being implemented</p> <p>Planned</p> <p>Being implemented</p> <p>Being implemented</p> <p>Being implemented</p>
<p>Programme 2 Resource Productivity Enhancement</p> <p>1 National Forestry Action Plan</p> <p>2 ENR Degradation Studies</p> <p>3 Sw/se Watershed Management</p> <p>4 Water Resources Monitoring/Assessment</p> <p>5 Fisheries Master Plan</p> <p>6 Pilot Wildlife/Livestock Ranching (PAMSU)</p> <p>7 Efficient Energy Utilization</p>	<p>0 05m</p> <p>0 15m</p> <p>0 41m</p> <p>4 47m</p> <p>0 73m</p> <p>0 85m</p> <p>0 31m</p>	<p>World Bank/IDA</p> <p>World Bank/IDA</p> <p>FAO</p> <p>DANIDA</p> <p>ADB</p> <p>World Bank/IDA</p> <p>UNIDO</p>	<p>Planned</p> <p>Part of EMCBP</p> <p>Planned</p> <p>Being implemented</p> <p>Being implemented</p> <p>Being implemented</p> <p>Being implemented</p>
<p>Programme 3 Biodiversity Conservation & Use</p> <p>1 Participatory Wildlife Conservation (PAMSU)</p> <p>2 Biodiversity Assessment (forest inventory)</p> <p>3 Lake Victoria Conservation (LVEMP)</p>	<p>106 8m</p> <p>0 25m</p> <p>5 9m</p>	<p>IDA/GEF/Others</p> <p>EU/GEF</p> <p>IDA/GEF</p>	<p>Being implemented</p> <p>Completed</p> <p>Being implemented</p>
<p>Programme 4 Education & Public Awareness</p> <p>1 Environmental Media Network</p>	<p>0 09m</p>	<p>F Ebert Foundation</p>	<p>Partly implemented, further discussions</p>
<p>Programme 5 Environmental Health & Pollution Management</p> <p>1 Ecologically Sustainable Industrial Development</p>	<p>1 03m</p>	<p>UNIDO/UNDP possible UNEP</p>	<p>Designed</p>

17

3. Coordinating Multiple Actors

The implementation of the NEAP depends on a multiplicity of institutions, agencies and organizations in both public and private sectors. Also involved are external agencies, i.e., the donors and the international NGO community. Uganda's NEAP has had to confront the coordination issue, something that all NEAPs have had to deal with as plans have moved from design to implementation (see Brinkerhoff, 1996a). The coordination function has posed several challenges, and addressing them figures prominently in the story of Uganda's NEAP implementation experience to date.

One challenge has been translating the broad and somewhat vague statements about coordination contained in the Environment Statute into operational procedures that function effectively. The NEAP design made the basic assumption that the lead environmental agency, NEMA, would coordinate actions in both the public and private sectors to ensure harmony in environmental management in the country. This assumption is incorporated into Sections 6 and 7 of the Environment Statute of 1995. The NEAP designers had a general notion of coordination as serving to avoid working at cross purposes and to increase impact by promoting synergies among those working on development and environmental interventions. Operationally, however, it turned out that clearly articulating and finetuning this notion was complex and conflict-producing. During implementation start-up, the further clarification of coordination was intertwined with discussions of NEMA's mandate and roles. In terms of practical implementation, a consensus has emerged that NEAP coordination rests upon three main pillars:

- a Information sharing, both horizontally between NEMA and the ELUs, and vertically between NEMA and districts and sub-districts
- b Resource sharing, in which the role of NEMA is to identify resources and pass them on to appropriate institutions with capacity to implement
- c Monitoring and reporting, where NEMA collects and consolidates information from various implementation partners to track compliance, achievement of targets, and impacts

The first and third pillars are related, with the distinction that information sharing emphasizes mutual assistance in support of achieving some technical task, whereas monitoring and reporting are more control-oriented in the service of mainly administrative ends. This consensus does not mean that discussion of what coordination entails is resolved. Some actors hold even more strongly to the control aspects of coordination and are of the view that NEMA's role should extend to involvement in the resolution of intersectoral conflicts and the expanded enforcement of laws and regulations. Others, however, are skeptical about such a role, arguing that it is a tough and complex one which could easily undermine the credibility of NEMA.

Another challenge for NEMA and the NEAP has been making an agreed-upon and effective distinction between coordination and implementation. This dividing line has proven to be thin and blurred. Some NEAP partners complain that on occasion NEMA has overstepped its coordination role and involved itself in implementation. Part of the confusion is historical, and stems from when the department of environment was transformed into NEMA. Some programs, such as the National Wetlands Programme, which were being implemented by the department could not easily find a new home and continued to be implemented under NEMA. The confusion over the dividing line is also a reflection of inter-organizational tensions and turf issues, which characterize situations where organizations see themselves as competing for scarce resources.

Another contributing factor relates to the lack of capacity of lead agencies to fulfill their environmental management responsibilities. The Environment Statute indicates that NEMA will operate in collaboration with lead agencies to carry out the NEAP mandate. However, in some situations, lead agency capacity to work with NEMA is weak, and NEMA has had to step into more of an implementation role than a coordination one.

A third challenge has to do with the breadth of NEMA's coordination function. The Environmental Statute gives NEMA a clear mandate to liaise not just with Ugandan public sector entities, but with the private sector, NGOs, and government agencies of other states on issues relating to environment. Further, the provisions for coordination extend to the district and local levels. NEMA staff have been hard pressed to establish linkages with all the partners that have current and potential roles and interests in the environment. It will take some time to streamline the coordination needed for NEAP implementation in the country and regionally, for example, as in the case of Lake Victoria.

4. Biodiversity and Local-level ENR Management

Among the NEAP's objectives is the conservation and restoration of ecosystems and biodiversity. In Uganda, as in other African NEAP countries with significant biodiversity, international support for this objective has been, and continues to be, strong. As noted above, design and implementation of protected area programs and community ICDPs predate the NEAP. At the national level during the NEAP design phase, USAID's APE supported institutional strengthening, particularly financial systems upgrading, for UNP, and contributed to the institutional reforms that combined UNP and the game department to create the semi-autonomous Uganda Wildlife Authority in 1996, and that reformed the wildlife law (see Matt et al., 1995). USAID was instrumental in facilitating the Ugandan government's decision to upgrade six protected areas to national park status, three in 1992, and three more in 1994.

At the local level, APE's GMU finances ICDPs that promote community-based initiatives in park buffer zones and protected areas, ecotourism development, and support to local NGOs and community organizations. These sorts of activities have continued under the NEAP's implementation phase. USAID is not the only funder, other donors and international NGOs are active in these areas as well.

In the districts that contain national parks and protected areas, the presence of these local-level efforts has helped to move the implementation of the NEAP institutional framework forward at a more rapid pace than in other districts. For example, the CARE-Development Through Conservation (DTC) project has been shepherding along an inter-district taskforce for Kabale, Kisoro and Rukungiri districts to address the operational implications of the local-level committee structures intended to engage in environmental planning and oversight, with a focus on avoiding duplication of effort and overlap (CARE, 1997). These initiatives serve as pilots for fleshing out the implementation details contained in the Environment and Wildlife Statutes and related legislation.

These efforts also provide experience and lessons in confronting the very real conflicts that arise over biodiversity issues in a country where local people are highly dependent upon the resource base for survival. The civil strife that Uganda has suffered adds another complicating layer to local-level ENR management. As an illustration, Box 2 summarizes the story of Lake Mburo National Park, which vividly encapsulates the dilemmas inherent in the balancing of conservation with sustainable use that is one of the NEAPs' stated objectives.⁶

5. Progress with Decentralization

As mentioned earlier, the decentralization law laid the groundwork for the district and sub-district implementation structures elaborated in the Environment Statute. Over the past two years the most progress on setting up these structures has taken place in the eight focal districts where World Bank and UNDP resources have been allocated to NEAP activities. These are Arua, Kotido, Mbale, Tororo, Jinja, Mbarara, Kabale, and Kasese. A few other districts received limited amounts of donor assistance for ENR efforts. Irish Aid provides assistance to Kibale, Kiboga, and Kumi, while the Dutch government assists Lira and Soroti.

Focal districts receive operational funds, some vehicles, and training in support of DEC's, DEO's, and LEC's. In addition, community-based micro-projects, which so far have concentrated upon the identification of ENR issues and problems, have started in these districts. No districts have conducted DEAP's to date, the main activity has been pre-planning training in PRA for sub-county ENR facilitators in six of the focal districts.

DEC's are operational in 17 districts, all of the eight focal districts plus Mubende. Bushenyi District had created a DEC, but is has yet to meet. LEC's have been established in the eight focal districts only. Of Uganda's 45 districts, 30 have recruited DEO's, with some districts hiring a second DEO for their municipality (Arua, Gulu, Jinja, and Mbarara).

Box 2 Lake Mburo National Park

The area around Lake Mburo was traditionally used as communally managed livestock grazing land by Bahima pastoralists until 1964 when the Ugandan government gazetted a 250 square mile parcel as a game reserve. To help protect the reserve, USAID sponsored a ranching and tsetse fly eradication program to transform the traditional pastoralists into private ranchers. The intent was to lure the cattle grazers off of the reserve with free land and ranching services, and to boost beef and milk production for national demand and export. However, the criteria for participation in the ranching scheme excluded the Bahima, and encouraged private entrepreneurs to take advantage of the program and fence off large tracts of land surrounding the reserve. With the loss of their communal grazing areas the Bahima became landless squatters in the reserve.

In 1983 the game reserve was upgraded to national park status and the pastoralist squatters were forcibly evicted at gunpoint. With Uganda's civil strife culminating in the establishment of the NRM Government, by 1986 local people had moved back into the park, chased away the staff, destroyed infrastructure, and re-established grazing for their cattle. Others also encroached on the park and neighboring areas, encouraged by the NRM Government to return to their homelands. Thus by the late 1980s and early 90s, Lake Mburo National Park and its biodiversity were in jeopardy, and serious conflicts among pastoralist squatters, returnees and private ranchers existed due to multiple claims on the land and its resource base.

In an effort to ameliorate the situation the new government reduced the size of the park to 100 square miles, and allocated the degazetted land among the various claimants. A Ranch Restructuring Board was set up to manage the allocation process. Donor assistance beginning in 1991, provided help in setting up dialogue processes to deal with the conflicts among the various resource users themselves, and between them and park officials. This assistance was followed by analytical support from FAO on wildlife and ranch management, and from USAID and the African Wildlife Foundation on community participation, ecotourism, and park management. In 1995 relocation of the squatters began, and Lake Mburo began gradually to return to park status in fact rather than just in name. Currently, representatives from 15 neighboring parishes participate in a park management committee, and work with park staff on a variety of activities. Besides 20 patrol rangers park staff include two community conservation rangers, and three education officers (plus one Peace Corps Volunteer) who conduct outreach and awareness activities in surrounding schools and communities. Revenue sharing of park gate receipts has been initiated, with 20 percent of the funds going for locally determined projects. Local area residents are demonstrating an increased acceptance of conservation and the value of wildlife, though some conflicts and tensions remain.

The experience of Lake Mburo dramatically highlights several key issues for ENR management and NEAP implementation. First, in situations where people's livelihoods depend directly on a resource base that is targeted for protection and conservation, conflicts over resource use are real and will not disappear with symbolic efforts at participation and appeals to the principle of sustainable use. Second, resolving conflicts calls for ongoing participatory mechanisms that can facilitate negotiation and compromise among the relevant stakeholders. Third, the possibilities for fruitful negotiation and compromise depend upon a policy framework that delineates appropriate categories of land use, and backs those up with implementation capacity. Fourth, international donor agencies can provide critical support by serving as a neutral party to encourage the establishment of venues and mechanisms for negotiation and conflict resolution and by providing the resources necessary to implement solutions.

III. ANALYSIS OF THE NEAP EXPERIENCE

The assessment's analytic approach is based on the framework used in the five earlier field cases. This framework looks at six conditions associated with successful policy implementation. This section presents an analysis of Uganda's NEAP, organized in terms of the six conditions.

A. CLARITY AND CONSISTENCY OF POLICY OBJECTIVES

The policy contains clear and consistent objectives, or some criteria for resolving goal conflicts.

The NEAP's objectives, as presented in both the NEAP document and the Environmental Statute, are clearly stated and reflect a greater level of specifics than NEAPs in some other countries. Particularly as elaborated in the NEAP document, policy objectives relating to each of the taskforce areas are specified (see II B 2 above), as well as objectives for crosscutting issues such as incorporation of gender and promotion of broad participation in ENR management.

The NEAP incorporates and builds upon an existing policy and legal framework. As the NEAP document notes, "There are over 60 pieces of legislation governing various aspects of natural resources management and the protection of the environment emanating from either the central Government or enacted as bye-laws by various local authorities and local administrations" (MNR, 1995: 75). The NEAP document goes on to note that the existing framework overlooks or only partially incorporates other important environmental concerns, e.g. wetlands, waste management other than sewage, air and water quality, and that it inadequately copes with intersectoral linkages. It cites the need for extensive legislative and policy review and rationalization to harmonize existing laws and regulations and to fill in the gaps identified.

This review process, then, is a key element of successful NEAP implementation, and one that NEMA and other NEAP partners are both aware of and are working on. The basic Environment Statute of 1995 represents a major step in this direction. Several other laws and policies are central to this revision and harmonization process as well. These include the decentralization policy of 1993, Local Government Statute No. 15; the Wildlife Statute of 1996, the Forestry Statute currently under revision, the Water Action Plan and Statute, and the Constitution of 1995. A critical arena for continuing the process will be the elaboration of regulations and by-laws, for it is there that the conflicts and inconsistencies, which more general policy statements gloss over, will emerge. Decentralization adds further complexity to this arena. A key feature of the NEAP policy framework is the ability of districts and sub-counties to develop their own environmental by-laws and regulations (see Odwedo, 1995 and 1996, Rukuba-Ngaiza and Hitchcock, 1995, Veit, 1994). This allows for local adaptations, but creates the potential for inconsistencies both within and across districts.

The various NEAP implementation actors appreciate that it is difficult to achieve consistency across policies in the environment sector, where issues crosscut each other and many actors participate. Considerable efforts were made during NEAP formulation to address consistency. The architects of the NEAP struck delicate compromises, as they tried to establish balances between different and sometimes competing interests. The main strategy adopted was to make

22

the process for NEAP formulation as participatory as possible. Each of the nine taskforces that addressed thematic topics had broad representation in their membership. Similarly, the regional workshops and the National Conference held in 1992 were highly participatory.

There is a consensus among implementation actors that clear and consistent objectives are important for smooth implementation of the NEAP. However, they also understand that the crosscutting nature of the sector creates difficulties that undermine this desired clarity. Compared to NEAP formulation, maintaining the kind of wide participation that can help to address consistency and resolve conflicts during implementation is more problematic. It is appreciated by a good number of NEAP actors that clarity and consistency of policy objectives will ultimately result from a persistent consultation and learning process. Among NEMA's functions is to serve as a convener to assure that consultation, learning, and conflict resolution can take place.

B. VALIDITY OF THE POLICY PRESCRIPTIONS

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

The NEAP formulation process included an extensive analytic component, which was technically and scientifically well grounded in the research and experience base of African ENR management, and based upon extensive participatory consultation. The NEAP policy prescriptions, as expressed in the Environment Statute and other legislation, such as the Wildlife Statute, create an opportunity to address the balance between resource conservation and protection, and sustainable use. To the extent that subsequent elaboration of regulations and by-laws incorporate appropriate incentives and enforceable provisions, the NEAP policy prescriptions can be expected to reflect current understanding of the links between ENR policies and user behaviors.⁷

The Environment Statute clearly states the general principles of environmental management on which other policies are based. The law contains specific provisions for environmental planning at national and district levels (Sections 18 and 19), environmental regulations and standards (Parts IV and V), environment management which spells out policies on use of various natural resources, e.g., wetlands, rangelands, rivers, and handling of waste and hazardous materials etc (Part IV). The legislation also addresses pollution control (Part VIII). Thus the Statute provides an adequate legal framework capable of supporting effective policy prescriptions.

Progress has been made in the preparation of supporting sectoral enabling legislation necessary to flesh out the overarching NEAP-inspired policy framework. The Wildlife Statute, passed in 1996, which merged Wildlife department and Uganda National Parks, is one prominent example. This Statute consolidates management of wildlife resources and protected areas, a central concern of the NEAP, under one integrated law. As does the Environment Statute, it provides for decentralized management through local wildlife committees, akin to the former's local environment committees. Further, the Wildlife Statute makes specific reference to the Environment Statute regarding the need for EIAs.

Another sector that receives attention in the NEAP is forestry. The Forestry Act is currently under review for revision, funded by UNEP. Under the current law the management of forest resources is centralized. However, the Ministry of Natural Resources (MNR) has issued administrative guidelines for the management of forests in Uganda in the line with decentralization. Essentially, the guidelines recommend a return to the 1967 two-tier system of managing forests. This system distinguishes between Local Forest Reserves and forests of a national and international importance referred to as Central Forest Reserves. According to the guidelines, the local reserves will be managed by the district administration, which will retain all revenues accruing from these reserves. The forests have to be managed in accordance with the provisions of the Act, but districts are free to employ the services of a district forest officer or anybody of their choice, as long as they respect the Act's provisions. Local management plans have to be developed in consultation with the Forest Department in Kampala, and any changes in the plans also need a blessing of the Department.

With regard to Central Forest Reserves the guidelines require central management oversight but with activities delegated to the districts. The staff who will be posted to the districts by the center will operate under the supervisory authority of the Chief Administrative Officer (CAO)-- a district official. Revenue collected by central government from Central Forest Reserves are to be shared between the center and local authorities in a 60/40 split. The revenue-sharing arrangement is intended to create an effective incentive for local authorities to develop a sense of ownership and interest in the management of Central Forest Reserves located in their districts.

The water sector is covered by the NEAP as well (see Chapter 2.5). Many of the issues raised by the NEAP in this sector have been taken care of in the Water Action Plan for Uganda, prepared with DANIDA assistance in 1994. A comprehensive law, which recognizes the cross-sectoral supervisory role of NEMA, emerged from the Action Plan and was passed by Parliament in 1995. In accordance with the NEAP principle of involving local communities in management of resources, the 1995 Water Statute has elaborate provisions for local water committees. The Water Action Plan and Statute have taken into account requirements and principles in international and regional protocols and instruments in which Uganda participates, for example, the Nile Basin agreements, the Lake Victoria Environment Management Programme (LVEMP), the International Convention on Pollution, Waste Disposal, and Use of Chemicals, and the program, Technical Cooperation for the Promotion of Development and Environment Protection of the Nile Basin (TECCONILE).

Three other sectors covered by the NEAP where supporting legislation to facilitate implementation has been developed, or is planned, are fisheries, wetlands, and land. Uganda's Fisheries Master Plan is currently under preparation with assistance from the African Development Bank. The project includes among its components a review of the present legal framework and environmental issues in the sector. Preliminary drafts indicate that the concerns of the NEAP, as listed in Chapter 2.6 on the fisheries sector, are receiving attention and will be adequately reflected in the Master Plan expected to be out by early 1998.

A National Wetlands Policy was finalized in 1994, addressing a critical environment concern for Uganda, where wetlands are under significant pressure for alternative uses. The policy is being implemented through a National Wetlands Conservation and Management Programme, with a

concentration in eight focal districts, supported by technical assistance from IUCN and funding from The Netherlands government⁸ Implementation arrangements incorporate decentralized management, in harmony with the NEAP implementation approach in general To date, implementation activities have focused on analysis and monitoring, planning, pilot demonstration activities, and awareness building Policy compliance is relatively spotty, and final versions of enforceable regulations and standards remain to be developed

Land tenure arrangements have long been recognized as an important source of incentives for ENR behaviors in Uganda (see, for example, Kamugasha, 1987) The NEAP addresses land issues, and now two years later a Land Bill is in the early stages of debate This revision of land law, and related tax policies, provides an opportunity to modify incentives in order to facilitate sustainable environmental practices, such as the introduction of environment covenants in land leases, or changes in land classifications and taxation rates (see, for example, Ahene, 1994)

The above progress notwithstanding, a critical implementation issue has been the slow pace in developing the supporting rules, detailed regulations, and applicable standards that will put the NEAP policies into practice and provide the legal basis for uniform and credible enforcement At the national level, delays in preparing regulations, for example, to guide EIA, to control discharge of wastes, and to set pollution standards, have created legal ambiguities and confusion in implementing NEAP policies The July 1997 public hearing on the Lake Victoria water hyacinth problem and the use of chemical controls illustrates the difficulties The hearing was conducted in an effort to respond to public pressure to act on this important environmental concern, but the EIA regulations existed only in draft form The result was uncertainty on the part of private firms regarding their legal obligations, confusion about what the next steps were and who was responsible for taking them, and tension between NEMA and the agency coordinating the water hyacinth program, the Ministry of Agriculture, Animal Industry and Fisheries

At the district level, the elaboration of the provisions of the Environment Statute includes the development of ordinances and by-laws These will be crucial to operationalizing NEAP policies for local resource users and to assuring compliance (Rukuba-Ngaiza and Hitchcock, 1995) However, few districts have moved ahead with by-law development The need for public participation and limited district-level technical and limited administrative capacity help to explain this slowness (see Gibson, 1996)

C. FACILITATIVE IMPLEMENTATION STRUCTURES AND PROCEDURES

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

The NEAP and its accompanying enabling legislation provide for both a horizontal and vertical network of implementation partners Uganda's NEAP is foremost among African countries in elaborating implementation arrangements that systematically link central-level ENR activities with the local level through decentralization Besides public sector entities at the central, district,



and local levels, NEAP implementation arrangements include local NGOs, community groups, and the private sector. International implementation actors include donors and NGOs, who have been critical facilitators of both the preparation of the NEAP and of its implementation. The design of NEAP implementation structures seeks to take into account the following considerations:

- The need to integrate actions horizontally across sectors, and vertically from the central to the local levels
- The need to accommodate the broad range of interests in ENR and to promote healthy synergies and cooperation among public, private, and civil society actors.
- The need to provide the prerequisite power and authority to lead environmental agencies, first and foremost NEMA, in order to enable them to secure compliance from collaborating institutions and hence effectively carry out their coordination, supervisory and monitoring roles
- The need to maximize information sharing among the various NEAP actors in order to encourage learning and promote effective and sustainable ENR use.

1. Central-level Implementation Structures

At the center of the NEAP network is NEMA, a semi-autonomous body, with its linked antennae of ELUs in cooperating agencies (sectoral ministries, municipalities, universities, etc.) and decentralized DEC and DEO. Although relatively independent, NEMA operates under the general supervision of the MNR. This linkage is designed to provide a connection to the mainstream government bureaucracy, an arrangement which, among other things, ensures that NEMA can receive funds from the national budget and its interests can be channeled to the cabinet and parliament through the ministry.

NEMA derives its cross-sectoral authority from its top-level oversight body, the Policy Committee on the Environment, chaired by the Prime Minister and consisting of ten ministers whose portfolios have important bearing on the environment [S 8, Environment Statute]. This arrangement is intended to provide the bureaucratic power required to supervise line ministries due to the higher authority of the office of the Prime Minister. However, some interviewees expressed doubts that, in the event of a serious difference between NEMA and a sectoral ministry, the linkage to the Prime Minister's office would enable NEMA to prevail. So far such a conflict has not arisen, thus the effectiveness of the linkage remains untested.

NEMA has a Board of Directors, which includes representatives of academic and research institutions, NGOs, and the private sector. The composition of the board is designed to reflect the interests of the wide range of actors in the NEAP. The board fulfills a combination watchdog-chaperone role, offering both commentary and advice on NEMA's performance, and interceding on NEMA's behalf with key NEAP constituencies, national and international. NEMA also has four technical committees, appointed by the board, that provide advice on various technical issues: soil conservation, environmental impact assessment, biodiversity conservation, and pollution licensing. The committees have from five to ten members each.

24

The ELU structure is critical to NEAP implementation. Its major function is to coordinate environmental activities at ministerial and departmental levels, and assure interaction and feedback with NEMA on a constant basis. Although ELUs have the potential to serve as effective members of the horizontal NEAP network, for a variety of reasons their performance so far is still wanting in some important respects. It was pointed out that there has been a tendency to relegate the ELU function to junior desk officers who are far removed from the decision-making circles within the ministry, and this practice has undermined the impact of ELUs. Some of those interviewed were also of the view that sectoral ministries have not yet adequately understood or internalized the role and functions of NEMA, so as to determine how best to perform their partnership responsibilities. Interestingly others felt that NEMA has failed to understand correctly the role of sectoral ministries, and has paid inadequate attention to building ELU capacities.

One thing is clear, however, the ELUs need to function effectively. Making this happen requires both further elaboration of the objectives and modalities for NEMA-ELU collaboration, and-- importantly-- realistic recognition of the resources and capacities required to make collaboration operational and effective. In the absence of effective and functioning ELUs, NEMA will be unable to fulfill its own mandate. For example, NEMA's ability to develop environmental standards and monitor them depends critically upon technical expertise that resides in the sectoral ministries. The risk for NEMA is the temptation to try to "go it alone," a strategy that guarantees overload and failure to deliver on meeting targets, issues that already confront NEMA regarding the Bank's EMCBP.⁹

2. Local-level Implementation Structures

As described previously, the Environment Statute creates vertical linkages from the center to the districts and localities through DECs, DEOs, and LECs. The design of these NEAP institutional structures took place in the context of some fundamental reforms in the governance and administrative structures in Uganda. The 1993 Local Government Statute laid the base for decentralization and increased local participation (see Kisubi, 1996). The 1995 Constitution (Article 39) makes pronouncements about citizens' rights to a protected and viable environment and the government's obligation to assure these rights. The 1997 Local Government Act amends the 1993 Statute to reinforce and clarify local decision-making authority and procedures (see Leonard, 1997, Odwedo, 1996). Given the magnitude of the administrative changes underway, it is not surprising that there remain some areas calling for additional clarification and harmonization regarding the NEAP's local-level implementation arrangements. For example, according to the sixth schedule of the 1995 Constitution, the environment sector is listed as a function and service of central government, at the same time the 1997 Local Government Act calls for decentralization of some national functions and services specified in the constitution. Although this may strictly speaking not be a contradiction as such, a number of the public sector officials interviewed cited confusion over allocation of functions between the center and districts as a problem for implementation.

Besides sorting out the ambiguities and filling in the gaps in the legal and institutional framework for local-level structures, effective implementation depends upon how districts and localities move ahead in acting upon their mandates, i.e., in translating what exists on paper into

practice. One challenge is overcoming entrenched ways of planning and conducting development activities. Muramira (1995) notes that districts tend to take a strongly sectoral approach to planning and exhibit a bias toward social services provision. DEOs interviewed confirmed this observation, and mentioned the difficulties in effectively integrating cross-cutting ENR issues into the sectorally dominated district planning process.

Another obvious fundamental constraining challenge is the limited availability of financial resources, something mentioned by numerous interviewees. Legal mandates for local-level NEAP implementation notwithstanding, local governments remain highly dependent upon the center for funds. Around 75 percent of local government revenues come from the central government budget, and only 25 percent from local taxes. A large percentage of the central government monies are earmarked for specific purposes and priorities (not the environment), thus reducing the scope for local discretionary spending. Further problems are caused by persistent revenue shortfalls at the center, resulting in budget reductions and delays in transmitting allocated funds to districts. These problems are exacerbated by weaknesses in the funds transmittal and banking system. Predictably, districts experience difficulties in meeting payrolls, fulfilling contractual obligations, and so on, particularly toward the end of the fiscal year.

The financial constraint has had several impacts on district efforts to implement the NEAP. First, a minority of districts have formed DECAs or hired DEOs, who are local government employees whose salaries are a district responsibility. Second, some districts have added the environment function to existing committees and to the job description of current district staff. In Kabale District, for example, the environment committee has been combined with the production committee to form the District Production and Environmental Committee. The same arrangement has been made in Mbarara District. Another popular combination is that of environment and health. The risk is that if funding is available for the other sector in the joint committee, then the environment gets short shrift. Third, although on average DECAs are expected to sit about four times in a year, in many districts they meet less frequently. Fourth, DEOs, where they have been hired, often have few of the basic necessities with which to perform their functions, such as office supplies, transport, etc.

Because of the resource shortages facing districts, it is not surprising that the most NEAP implementation progress at the local level has been in those districts targeted for donor support. For example, office equipment, four-wheel drive vehicles, and cost-sharing on operating expenses have been provided to DEOs in NEMA target districts through the World Bank-funded EMCBP. Availability of resources, especially transport, has considerably enhanced environmental work at the district level and below. In Kabale, for example, it has speeded up the process of forming LECs and of conducting community PRA training.

Below the districts at the sub-county and village levels, participation of local communities is an intended cornerstone of NEAP implementation. However, just as for districts, the same kind of resource constraints prevail. Although the share of local taxes that sub-counties are authorized to retain has recently increased from 50 to 65 percent, the sums available are quite small and the claims against them numerous.

28

Further, when local authorities have discretionary funds, spending decisions can be influenced by the desire of elected officials to provide demonstrable benefits to their supporters in hopes of increasing their chances for re-election. Veit (1994), for example, in a study of Kasese, notes that most sub-counties spend the majority of their resources on a single capital-intensive infrastructure project, such as a school or dispensary, which is highly visible. ENR investments rarely can be packaged in ways that have such direct appeal, thus lowering the incentives for local officials to allocate resources for the environment.

Community-based ENR activities in support of the NEAP are largely funded by donors. For example, PRAs are being introduced by NEMA as part of the EMCBP through the DEOs, and are used by NGOs in national park and protected area buffer zone communities. EMCBP and APE have small-grant components that funnel resources to the grass-roots and to NGOs, as does the Mgahinga-Bwindi Impenetrable Forest Conservation Trust (see Box 3 below).

While the NEAP's institutional framework addresses horizontal linkages at the center, the emphasis at the local level is on the vertical connection upwards to the center. The Environment Statute does not say much about inter-district cooperation.¹⁰ This is a structural gap that needs to be filled for effective NEAP implementation. As was pointed out during district interviews, this local-level horizontal mode of cooperation is important in order to harmonize inter-district policies on shared resources, such as rivers, wetlands, and forests. Some local-level experimentation to forge such cooperative linkages is taking place. For example, CARE's USAID-funded DTC Project is creating an inter-district structure in Kabale, Kisoro and Rukungiri Districts (see CARE, 1997).

D. APPROPRIATE AND SUFFICIENT CAPACITY

Leaders, managers, and agencies possess sufficient management and political skills, and are committed to the policy objectives.

The expectations for performance placed on NEAP implementation partners are high, both from donor agencies and from national stakeholders, yet lack of capacity is a fundamental problem. Capacity constraints arise for NEMA, the ELUs, the districts, NGOs, and local communities, none of which can be dealt with easily in the short term and many of which are interconnected. These constraints will dictate the pace of implementation, particularly the spread of decentralized ENR policy management across the country. NEMA is currently able to support field activities mainly in the eight districts on which donor funds are targeted with only minimal efforts elsewhere, but Uganda has 45 districts. Reaching the sub-county and parish levels with any degree of uniform coverage is a long-term endeavor.

The emphasis that has been placed on capacity building in Uganda's rehabilitation and development programs responds to the severe loss of social and institutional capital during the years of economic decline and civil strife (see Brett, 1994). In all sectors, Uganda needs to restore and add management and implementation capacity, and the environment sector is no exception. Since the late 1980s there have been several national initiatives to address the capacity needs of the country: a national manpower survey, a capacity building plan, and a

human resources development project¹¹ Most recently in 1996, a national capacity assessment project, whose main objective was to identify the most economically debilitating deficits in human and institutional capacity was carried out with World Bank support (see Kalema et al . 1996, Tata, 1996) This effort resulted in a plan prepared by the Ministry of Planning and Economic Development Among the priority areas identified that have an important bearing on NEAP implementation are strengthening of manpower planning within government, attention to training, strengthening capacity for policy analysis outside government and encouraging the return of skilled Ugandans from the diaspora

To a considerable extent the implementation of the NEAP depends on the catalyzing actions of NEMA It is therefore not surprising that the institutional placement and capacity of NEMA are two related issues that have attracted much discussion Many argue that the key to NEMA's ability to fulfill its functions lies with its institutional affiliation Strong views have been expressed that NEMA should have been located in the President's or Prime Minister's Office to give it extra clout to deal with the line ministries This type of arrangement, however, does not necessarily always work On the contrary there is always a possibility that environment could be sidelined as the high offices attend to more urgent and high priority agendas such as national security and defense It has also been contended that placing NEMA under a ministry that is also responsible for forestry, a major environmental concern, is not wise The arrangement can result in conflict of interest and risks compromising the supervisory powers of NEMA vis a vis the forestry department

Placement, though, is only part of the picture Of more pressing concern is the present capacity of NEMA and its staff complement to effectively carry out its mandate A lot of skepticism has been expressed Currently NEMA has only 26 professional staff Almost all those interviewed felt that the current staff strength falls short of what is required to effectively implement the ambitious NEAP mandate A few felt that NEMA has not taken full advantage of the existing capacity within ministries to implement NEAP, nor has it effectively utilized the ELUs, or the district and local environment committees One of the major concerns interviewees expressed about existing NEMA staff is that although well qualified and committed a number of them are junior relative to their sectoral ministry counterparts, and they lack the requisite experience to deal with the intricacies and infighting of the government bureaucracy Another issue raised was the fit between NEMA's functions and its staff skill mix Most NEMA staff have a technical or scientific background, but an important element of their responsibilities deals with interpreting and enforcing the legal and policy provisions of the NEAP

Considering that NEMA has barely been in existence for two years, the agency cannot be expected to have acquired all the implementing capabilities that the NEAP calls for However, NEMA needs a strategy for addressing its capacity problems while at the same time making progress on NEAP targets Significantly, one critical management capacity that both interviewees and donor agency documents cited as being weak in NEMA is strategic priority-setting Over time, if the impediments to smooth implementation inherent in a continued capacity deficit are not reduced, the risk of dwindling stakeholder support, citizen disillusionment with the NEAP, and donor frustration is likely to grow

Beyond NEMA, capacity gaps in the ELUs, DEC's, DEOs, and local implementing agents need filling as well. Currently, the sectoral ministries and NEMA are discussing how best to make the ELUs operationally effective, with a key concern being who pays for it. For the district level, NEMA has already conducted a three-week course for DEOs, and the Authority's DCU works in close collaboration with districts to help them carry out their responsibilities¹². But given the capacity shortages in districts generally, much more training, accompanied by sufficient operating budgets, will be required to give districts effective implementation capacity in any sector (see Leonard, 1997). And beyond the public sector, international NGOs and the growing indigenous cadre of NGOs have been active, particularly at the local level, in community ENR management capacity-building. Donor-funded mini-projects and ICDPs, such as those supported by APE's GMU, also have contributed to community capacity.

E. STAKEHOLDER SUPPORT

The policy receives ongoing support from constituency groups and key stakeholders.

Stakeholder awareness and public discussion of environmental issues is higher in Uganda than in many countries. From the very highest levels of the NRM Government on down, there appears to be generalized support for, if not complete understanding of, environmental concerns, both on the conservation ("green") and pollution ("brown") sides¹³. The press plays a role here, covering ENR issues on a limited but somewhat regular basis. NEMA's education and awareness campaigns, and those of several indigenous NGOs, for example, the Association for Afforestation, have contributed to public awareness, particularly in Kampala, Jinja, and other urban centers. Further, NEMA has responded publicly and quickly to citizen complaints regarding environmental issues, such as confronting a cement factory in Kasese over pollution, negotiating with developers regarding wetlands, and dealing with municipal garbage disposal in Kampala. These highly visible efforts have garnered some public support for NEMA's environmental watchdog role¹⁴.

Uganda faces the classic tension between economic development and ENR goals. For poor rural resource users, many of whom are women, the issue is often lack of alternatives to environmentally damaging behaviors. They often recognize that their livelihood practices jeopardize sustainable ENR use, but they face immediate survival needs, and in many cases have neither the resources nor the incentives to change their ways. Residents of buffer zones around parks and protected areas confront the tension very directly, either by being denied access to resources they previously enjoyed, or by suffering wildlife damage to crops and property (see Box 2). Participatory conservation efforts and ICDPs seek to create value for buffer zone communities from ENR protection, thereby converting local residents into supportive stakeholders and creating positive incentives¹⁵.

For higher income groups the issue revolves around the trade-offs between pursuit of immediate economic benefits, which may have negative environmental effects, and making adjustments to accommodate better ENR practices, which will have long-term benefits in the future. Mbarara's "bare hills," for example, dramatically illustrate the cumulative impact of large numbers of landowners' decisions regarding resource use on their lands for short-term economic gain at the cost of worsening deforestation, erosion, and soil loss. In Kabale, wetlands drainage has taken

place as a result of the actions of the relatively rich, not the poor. There is a significant class of national economic actors in Uganda whose support for environmental policies is largely contingent upon the extent to which those policies conflict with or impede their economic pursuits, despite their recognition that such pursuits may be damaging. Such actors may in fact espouse approval for ENR-protecting policies in general (such as the lofty environmental principles included in the constitution), while quietly opposing or ignoring them in the specific case of their own situations. It is important not to mistake this kind of approval for in-depth and widespread stakeholder support for the environment.

In light of Uganda's drive to attract foreign private sector investment, the trade-offs between ENR protection and economic growth are likely to become more acute, particularly around the application and enforcement of EIA regulations, once these are finalized. The controversy over the planned expansion of the Jinja power station, which will flood a scenic portion of the Nile, is one illustration. As the pace of investment increases, NEMA will be called upon to intervene more and more in ways that will alter the balance between winners and losers. Stakeholders will need to be managed so as to avoid the classic charge leveled against environmental agencies in other African countries, and one that confronts NEMA as well, that they are "blocking development."

Another important set of stakeholders for the NEAP includes the international donors and the international conservation NGOs. Several interviewees expressed the view that without their ongoing support, first of all, the NEAP would not have been developed, and second, it cannot be successfully implemented. Obviously the resources this stakeholder group commands are critical to implementation, but donors and NGOs also have brought ideas and technical expertise as well, particularly on the NEAP's biodiversity components. Further, they have forged alliances with the growing indigenous NGO sector, whose members have become strong local proponents of ENR sustainable use and of the NEAP, and many of whom are active partners with NEMA in a range of NEAP activities, from environmental awareness promotion to legal advocacy. Examples of these stakeholders are the Wildlife Clubs of Uganda, The Auxiliary Foundation, Environmental Alert, and Joint Energy and Environment Projects (JEEP).

In addition to partnering with public sector entities like NEMA, Ugandan NGOs are increasing their linkages with each other. Among the older of such linkage mechanisms is DENIVA (the Development Network of Indigenous Voluntary Associations), founded in 1988. Among the newest is the National NGO Forum, launched in January 1997, whose council has 82 elected members. The members of these associations include NGOs that intervene in a variety of sectors, but a significant proportion of them have a rural development and ENR focus.

The NEAP's reliance upon decentralization and broad-based participation offers the possibility that the needs and desires of local stakeholders can be more easily addressed in ways that are more responsive, flexible, and accountable. Communities and villages, where those Ugandans whose day-to-day livelihoods depend directly upon the country's natural resource base reside, are a vitally important set of stakeholders. Besides NGOs, communities are often assisted by churches and religious groups to organize and build the social capital that encourages the pursuit of common objectives. Many church groups are active at the grassroots in basic rural development projects dealing with soil and water conservation, basic ENR concerns. In Kabale

District, for example, most of the chairmen of the LECs are ministers, reflecting their ability both to command the confidence of community members and to act effectively on their behalf

As previously noted, decentralized and participatory mechanisms and procedures for ENR management are in their nascent operational stages in most cases, even in the donor-supported focal districts. Over time, however, progress in successfully implementing them could generate wider and more sustained stakeholder support among larger numbers of Ugandan citizens. It is important to recognize, however, that the growth of such support will in large part depend upon how well the NEAP's legal provisions and procedures, in practice and not just on paper, balance access to natural resources for sustainable use with conservation and preservation, and provide a viable framework for mitigating conflicts among claimants

F. SUPPORTIVE SOCIOECONOMIC AND POLITICAL CONDITIONS

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.

Uganda is emerging from a long period of political turmoil and socioeconomic decline. A significant amount of rebuilding and progress has been made in a relatively short period of time, though much remains to be done to consolidate and extend the early gains (see Apter, 1995, Khadiagala, 1993, Omara-Otunnu, 1992). Ongoing flows of international donor funds and private sector investment will be influenced by how well these promising beginnings bear fruit. Their fragility and the danger of reversal need to be recognized. For example, related to ENR and the NEAP, recent unrest and banditry in the southwestern region has led to a sharp decline in ecotourism this year.

The situation in the southwest exemplifies the fact that despite the overall improving political situation there are nevertheless still pockets of insecurity in some parts of Uganda. Districts that are located in those areas have experienced problems in NEAP implementation. Apart from Arua, they are conspicuously absent from the NEMA list of target/focus districts. The worry is the long-term impact this state of affairs is likely to have on NEAP implementation strategies, leading to delays due to the suspension of normal government activity in those districts.

Achieving the current level of political stability has involved some compromises that hold implications for NEAP implementation. The NRM Government's efforts to create broad-based support and to satisfy its various political stakeholders has led to an expansion in the number of ministries in order to create vacancies for individuals representing different interests that need to be accommodated. A large government complicates the coordination function further, and adds complexity to the implementation process. Jurisdictional conflicts are escalated as a result. The situation is changing for the better, the size of government has been gradually cut down as the political tensions that characterized the early days of the NRM Government continue to subside. Additionally, the World Bank-supported civil service reform has helped in trimming the size of government.

Positive for NEAP implementation is a strong expressed government commitment to ENR policies. Commitment is difficult to assess with any degree of accuracy, and indicators for and against are open to interpretation. The President mentions environmental issues in his public communiques, and many government agencies espouse the desire and intent to build environmental considerations into their programs and actions. Some observers express the view, however, that the real level of government commitment is more halfhearted than public pronouncements, which are intended for donor and public consumption. They suggest that private sector investment and national security are the issues of paramount government concern, not the environment. Some cite the fact that the government has not met its obligations for counterpart funding for NEMA under the EMCBP as a sign of weak commitment. On the other hand, countering such skeptical views, several interviewees cited as signs of commitment the passage of the Environment Statute, which in some important respects imposes obligations for government action, and the fact that NEMA has been given a relatively free hand in interpreting and carrying out its mandate.

The democratic governance moves toward decentralization and increased local participation are encouraging for the success of Uganda's NEAP. The government's decentralization policy, which has transferred some powers to the district level and below, has created a favorable climate for NEAP implementation at the grassroots level. Many of the people interviewed conceded that establishing DEC's and hiring DEOs would have been difficult under the centralized system of government that was still in existence as recently as 1991 when discussions on the NEAP started. As citizens and government officials gain more experience with decentralized and participatory systems and procedures, NEAP implementation progress will likely be facilitated and accelerated.

Other factors in the socioeconomic and political setting that are encouraging for NEAP implementation include the increased participation of indigenous NGOs in ENR activities and, more generally, the development of a strong civil society, plus a vibrant media sector that pays attention to ENR issues and can inform and educate the public. The increased private sector investment that Uganda is beginning to enjoy could either help or hinder NEAP implementation. To the extent that investment projects allow NEMA to gain experience with EIAs and the provisions of those assessments are respected, and environmental standards enforced, private investment will advance the development of appropriate and viable ENR rules and regulations that protect the environment while contributing to socioeconomic growth. However, if private investment deals are cut that disregard or shortcut laws and regulations, and benefit privileged actors at the expense of ENR concerns, then the environment will suffer and citizen cynicism about government commitment to the NEAP and the Environment Statute could increase.

IV. IMPLEMENTATION CHALLENGES

Analysis of African NEAPs and ENR policy implementation reveals that progress will be influenced by the extent to which the following challenges are successfully confronted (Brinkerhoff with Honadle, 1996). This section discusses how Uganda's NEAP has faced up to these challenges. They fall into five categories: 1) setting priorities, sequencing actions, and avoiding crisis management; 2) maintaining resource user participation and stakeholder support, 3) managing interorganizational linkages across sectoral boundaries, 4) coping with the evolution

of NEAP implementation strategically, and 5) dealing with resource constraints and financial sustainability

A. SETTING PRIORITIES, SEQUENCING ACTIONS, AVOIDING CRISIS MANAGEMENT

To a large extent, the successful evolution of NEAP implementation depends on how well priorities are set. This is true because 1) NEAP objectives are interconnected and interdependent, 2) NEAP implementors are also linked and interdependent, and 3) resource and capacity constraints limit the extent to which interventions can take place simultaneously on a broad scale. However, setting priorities in a situation where many actors are involved, who assess and rank priorities differently according to their own needs and organizational agendas, is a complicated undertaking. Uganda's NEAP emerged from an elaborate, highly participatory and consultative process. Its analytic approach is both comprehensive and ambitious. A point made by several interviewees, however, is that the NEAP's implementation strategy did not receive the degree of attention comparable to what went into its design.

A core element of strategy development is deciding which issues and actions deserve the highest priorities, and working out a hierarchy of effort and attention. This priority-setting and strategic planning cannot, for the reasons just elaborated, be done completely independently by any single implementing entity. As NEMA staff are well aware, the various NEAP implementing partners have different priorities, so selecting and ranking issues and actions is strongly influenced by whose priorities are taken into account. The risk of being pulled in several directions at once is ever-present.

It is obvious that the establishment of a legal framework has received priority attention, and this is indeed a logical and fundamental step. But while a necessary step toward effective implementation, it is not a sufficient one. What is needed is a sequence of steps, with milestones, and an agreed-upon process for deciding priorities and tracking progress. At the most general level, there is a sequence built into the NEAP, one that moves from establishing structures, to building capacity, to carrying out programs, and achieving results¹⁶. But getting down to specifics, it becomes apparent that there are many intertwined sequences, each with a different starting point, pace of progress, and outcomes. For example, at the community level, donor and NGO support to local communities around parks and protected areas, which predates the start-up of the NEAP, has led in certain cases to communities getting out ahead of the legal framework. In Kabale District one LEC is facing legal action from a landowner due to the committee's efforts to enforce restrictions on wetlands use. The case is contentious because the details of the National Wetlands Policy have not been worked out.

This example is symptomatic of the sequencing problem. The environmental framework law and basic enabling legislation have not been quickly followed by regulations, which are necessary as the basis of enforcement and operations. While NEMA labors to transform provisional guidelines into draft regulations, get those regulations reviewed and finalized, and submitted for parliamentary ratification, ENR actors at various levels, from national to local, are making decisions and taking actions. Furthermore, donor programs introduce their own sequences, with frequently compelling reasons to pay attention to their steps due to the funds attached. In fact,

35

NEMA has been criticized in some quarters for paying more heed to implementing the EMCBP than to the NEAP

It is easy to see how efforts to balance timely consideration of all these linked steps, and to respond to different perceptions of priority actions, can quickly lead to a reactive, crisis-driven management approach, where the groups or individuals that create the loudest fuss are responded to first. But managing by putting out fires as they erupt is neither efficient nor strategic (Kiggundu, 1996). There will always be unanticipated crises requiring unforeseen attention, but techniques exist that can reduce uncertainties and prioritize action.

The answer is not to seek to identify all the steps in all the relevant sequences in advance, nor to anticipate all crises. Regarding the former, such a detailed level of planning quickly becomes an end in itself and is ultimately unproductive. The latter is clearly an impossibility, implying a level of omniscience reserved for the divine. Rather, the situation can be dealt with by using the approaches and tools of strategic management (see IV D below). These can help decision-makers and managers sort through the issues that confront them, set priorities and identify key targets, and respond to stakeholder needs and desires. Importantly, they also encourage managers to establish a process for using the approaches and tools.¹⁷

B. MAINTAINING RESOURCE USER PARTICIPATION AND STAKEHOLDER SUPPORT

Many interviewees pointed to the NEAP as exemplifying grassroots policy-making and implementation. But it is clear that to date, the operational modalities that will make ongoing popular participation a reality remain, in some important respects, to be determined. This is not uniform across all aspects of the NEAP. It is less true, for example, of ICDPs in protected areas and national parks, where with donor support participatory approaches designed to shape resource user behaviors and build local support for conservation have been evolving for nearly a decade in some cases. However, for participation in other types of ENR activities, such as environmental planning, monitoring, and policy review, much less progress has been made. Kakuru et al. argue that for environmental impact assessment (EIA) this lag is due to the fact that,

Identifying effective methods of public involvement presents challenges in Uganda. Techniques employed in other countries, such as publishing EIA documents, holding public hearings, and providing opportunities to submit written comments may not adequately reach rural citizens. Literacy and local languages issues also will need to be considered (1995: 21).

The major opportunities for local participation in the NEAP exist as a result of the decentralized structures created by the Environment Statute, but these are still in the nascent stages of creation on the ground. So far, no districts have completed DEAPs, and no sub-counties have prepared LEAPs due mainly to capacity constraints. In focal districts, DEOs and DECAs are beginning to function, and some PRAs have been conducted. These efforts lay the foundation for expanding participation in the public structures for the NEAP. NGOs and civil society organizations are, and will continue to be, key to increasing participation, helping local resource users mobilize to

identify and express their ENR concerns, and mediating between communities and government agencies

However, despite Uganda's admirable push to decentralize ENR management, there are some serious questions to be asked regarding the extent to which the NEAP's decentralization, as currently conceived and pursued, is in fact going to promote bottom-up grass-roots initiative for sustainable use, or whether it will simply enlist local effort in the service of implementing a centrally managed ENR agenda. Experience demonstrates that long-term ENR policy objectives are unlikely to be achieved unless significant numbers of resource users at the local level are active participants in decisions regarding the rules and procedures for using those resources (see Rukuba-Ngaiza and Hitchcock, 1995). Even in countries with high levels of capacity, sole reliance on centrally-directed interdiction and enforcement strategies will not lead to ENR sustainability (Brinkerhoff with Honadle, 1996). Developing effective approaches will require confronting the conflicts that arise when there are competing uses for available resources, as Box 2 illustrates in the case of Lake Mburo National Park. It is important not to sweep the existence of conflict under the proverbial carpet, and not to over-idealize the extent to which participation can mitigate or resolve conflicts.

Redclift suggests that underlying much of the policy debate around sustainable development in many developing countries is "a bias toward 'managerialism' stemming from a top-down approach to local development" (1995: 23). The study team encountered several indications which suggest that, in practice though not necessarily in intent, Uganda's NEAP runs the risk of following this bias. One indication was an unfortunate incident-- from the point of view of incentives for community participation-- in Kabale District where the DEO had worked with several communities to identify micro-projects for funding from the EMCBP's grants component, but because the process did not include an "official" PRA, the proposals were rejected, leaving the DEO in the uncomfortable position of having to go back to the communities to tell them they had to follow centrally-approved procedures in order to be considered for funding. While perhaps this is an isolated event, it nonetheless illustrates what is often a pattern in program implementation, namely that administrative requirements drive action, rather than the needs of the intended beneficiaries.

Another indication, admittedly subtle and open to interpretation, was the notion, implied in remarks made by a number of the public officials interviewed, that local people are for the most part ignorant of the environmental impacts of their actions until exposed to awareness-building conducted by external agents¹⁸. Such attitudes often reflect an inherent view that local people are incompetent or-- worse-- malicious, and translate into practices that discount local input in favor of external direction. The growing body of knowledge regarding ENR co-management indicates that local knowledge and understanding, combined with specialized external expertise, is critical to designing and implementing interventions that can promote ENR sustainability (see Borrini-Feyerabend, 1997).

A third indication of potential problems in implementing the NEAP with significant grass-roots participation stems from how the Environment Statute's NEAP-DEAP-LEAP chain is delineated. The Statute talks about how each of the lower-level plans, as well as any locally-developed by-laws, are to be harmonized with the higher level plans and policies, but little is said regarding

how or whether higher-level plans and policies might be modified in light of decisions taken lower down. Thus the extent to which the center-to-periphery ENR "street" is one-way or dual direction remains to be seen.

The NEAP's rhetoric is participatory and user-focused, but the reality of that language is mediated by the legal and administrative structures and procedures established for implementation. Participation and the stakeholder support that derives from consultation and involvement are necessary for Uganda's NEAP to achieve its objectives. Governments cannot impose policy agendas that ultimately do not have the support of their citizens. Sustainable ENR policies involve "trade-offs between economic, social, and ecological objectives. Such trade-offs cannot be determined by 'scientific' means alone, no matter how multi-disciplinary. They are value judgements, and therefore 'people-centered' approaches are needed" (Carew-Reid et al., 1994: 51). The inevitability of conflicts cannot be avoided (see V B 2 below).

C. MANAGING INTERORGANIZATIONAL LINKAGES ACROSS SECTORAL BOUNDARIES

As the discussion of intertwined sequences above suggests, the implementation of the NEAP involves interorganizational action among many entities from the national to the local level.

Many of the linkages among NEAP implementation network actors are characterized in terms of coordination. However, in many cases what this means operationally has not been clarified, and is the source of some confusion and tension. NEMA is at the hub of the coordination nexus, and with only slightly more than one year of operations is still feeling its way toward concretizing its coordination mandate. Other agencies are still in the throes of determining their own roles in relation to NEMA and the various NEAP partners they connect with. Working out interorganizational linkages in the complex ENR sector is difficult and takes substantial time, no matter how "cut and dried" the connections may appear on paper.

Uganda's NEAP implementors need to be open to experimentation here, and remain flexible as they search for solutions that fit their circumstances. NEMA appears so far to have resisted the temptation to define these linkages in control terms, a strategy destined for failure.¹⁹ It has been suggested that,

The trick to making implementation networks function successfully is to achieve a balance between letting individual actors operate independently, and limiting their independence with supervision and control mechanisms, and resource interdependencies. Success depends upon offsetting plural responsibility diffused among actors with some degree of individual accountability for contributing to the larger outcomes (Brinkerhoff, 1996a: 1498).

Finding the appropriate balance will not happen without dissension or controversy. Jurisdictional conflicts are one type of linkage-related dispute, such as those that surfaced when the wildlife department was merged with Uganda National Parks to form UWA. Another type occurs when the rules governing land and resource use change (see Box 2), for example, the gazetting of some forest areas as National Parks (Bwindi, Mgahinga, Kibale, Ruwenzori mountains). Yet another

type relates to the allocation of resources to cope with meeting the obligations of interorganizational linkages. Examples here include the debate over who should fund what the ELUs are expected to do, or to what extent districts are responsible for using their own resources to implement center-determined mandates.

Crafting appropriate incentives is important to resolving these and other types of disputes that arise from interorganizational linkages. The NEAP cannot rely solely on the incentives and sanctions that derive from the corpus of ENR law. These are critical, but much of the coordination that needs to happen is administrative. Thus it is procedural in a managerial sense, but not totally in a legal one. Keeping this distinction in mind can help implementors to avoid excessive formalization, which can slow progress and paralyze joint action. There is convincing evidence that a judicious blend of formal and informal linkages facilitate policy implementation more effectively (Brinkerhoff, 1996a).

Another factor in the effective functioning of interorganizational linkages is the operational capacity of the various organizations involved. Capacity constraints have already been noted as a prime feature of NEAP implementation, limiting both the pace and scope of planned outcomes and results.

D. COPING WITH THE EVOLUTION OF NEAP IMPLEMENTATION STRATEGICALLY

Already discussed above (IV A) is the challenge of sequencing actions, setting priorities, and coping with crises. As noted, meeting this challenge calls for a strategic orientation and an outward-looking, forward-thinking managerial approach. The challenge here is related, but somewhat different. Because NEAP objectives are long-term and intended results do not become manifest immediately, tracking progress and making incremental adjustments over time are important to successful implementation. This raises the issue of milestones and indicators. In many countries, "ENR monitoring systems tend overwhelmingly to concentrate on following a set of technical indicators relating to NR use rates and user behaviors. Much less frequently monitored, and rarely in a systematic or formal way, are bureaucratic and/or political indicators relevant to ENR" (Brinkerhoff with Honadle, 1996: 26).

The overarching objective of Uganda's NEAP deals with sustainable development (see Box 1). This suggests the need to incorporate a broad array of indicators into the monitoring and management systems of NEAP implementing partners. Three categories of sustainability deserve attention: biophysical, social, and institutional. To date the NEAP has directed the majority of its information gathering and monitoring efforts toward the first category, with some attention to the second, and little to the third.

The sustainability of the biophysical environment and the natural resources base is what immediately comes to mind where ENR policies are concerned. Not surprisingly the NEAP and NEMA have concentrated efforts here. NEMA's largest unit, the Information and Monitoring Division, is devoted to collecting, analyzing, and reporting based on an array of biophysical environmental indicators. These make up the database for assessing degradation and improvement of the physical environment and the natural resources base, allowing status and

impact reports and the identification of trends over time. The presentation and analysis of these data make up the bulk of Uganda's state-of-the-environment report (see MNR, 1994)

It is well recognized that ENR policy depends upon the actions and attitudes of people, thus social sustainability is important too. Social sustainability refers to a) the maintenance or improvement of resource users' well-being, b) the practices and behaviors of resource users that affect the physical sustainability of a particular resource, and c) the distribution of benefit flows deriving from resource utilization across time (intergenerational) and space (Wollenberg and Colfer, 1997). Tracking of a set of indicators relating to social sustainability deserves attention as well²⁰. A significant amount of this type of analysis went into the design of the NEAP, and continues to be done, especially by NGOs for ICDPs, but it does not appear to have been incorporated into a systematic monitoring system related to the NEAP.

Particularly for assessing and making adjustments in the organizational and managerial aspects of NEAP implementation, it is important to consider institutional sustainability. This refers to the ability of organizations to fulfill their allotted functions, satisfy their stakeholders, attract and utilize resources, and achieve acceptable levels of performance over time (Brinkerhoff and Goldsmith, 1992). Although these issues are often the subject of discussion or of periodic analysis by NEAP implementors and international donors, rarely are they treated as factors to be systematically and routinely tracked as an integral element of ENR policy monitoring. Uganda's NEAP could benefit from the identification and monitoring of some indicators in this sustainability category²¹.

Addressing the evolution of NEAP implementation strategically involves integrating all three of these types of sustainability. This is not an easy undertaking, and it is tempting to focus on one category of sustainability to the relative exclusion of the others. The disciplinary training and background of implementing actors comes into play here. Environmental scientists are strongly attuned to biophysical sustainability and geographic information systems (GIS). Anthropologists and NGOs tend to favor the social dimensions of sustainability. Management analysts concentrate on institutional sustainability. Strategic integration calls for substantial reliance on multidisciplinary teams throughout the NEAP process, not simply during design. Further it calls for consultative and participatory management processes that reach out to the full range of NEAP stakeholders to assure their input, since particularly for the social and institutional types of indicators they are the key sources of such information.

E. DEALING WITH RESOURCE CONSTRAINTS AND FINANCIAL SUSTAINABILITY

Uganda's NEAP implementors, as revealed in both documents and interviews, are keenly aware of the problem of limited financial resources and dependence upon external and uncertain sources of funds for continuing implementation. Many interviewees expressed concern for the fate of NEMA and the NEAP once World Bank funding is terminated, and mentioned the fickleness of donor interests. One avenue that Uganda has pursued, and which holds intriguing promise for creating a more stable financial base for ENR activities is the establishment of trust funds and endowments for the environment²². Several such funding mechanisms have been established in Uganda, whose legal framework contains a sufficiently developed corpus of trust

law The Mgahinga and Bwindi Impenetrable Forest Conservation Trust (MBIFCT), established in 1995 with World Bank, USAID, and GEF support, was among the first (World Bank, 1995c) Box 3 provides further information on the MBIFCT

Box 3· The MBIFCT

The MBIFCT is a private entity established by deed under Ugandan trust law to manage a fund to promote the long-term conservation of the flora fauna and habitat of Bwindi Impenetrable Forest National Park and Mgahinga Gorilla National Park The two parks are the legal beneficiaries of the trust The GEF provided an initial capitalization of US\$4 million, which is currently invested and provides between US\$400-450 thousand annually for Trust operations The Trust's objectives focus on conservation of biodiversity, environmental awareness, and capacity-building Its funds support community-based projects (60%), basic research (20%), and park management (20%) USAID has financed the first year's operating expenses of the Trust's small management unit, based in Kabale and the Dutch government has agreed to cover the next five years A Technical Advisory Committee helps set priorities and evaluates project proposals' scientific and technical aspects A Local Community Steering Committee (LCSC) screens project proposals, co-signs on the management unit's local bank account interfaces with local communities regarding the MBIFCT, and serves as a participatory forum for discussion of ENR issues LCSC membership includes representatives of local communities national park wardens local governments, NGOs, and technical assistance projects Examples of the types of community projects that the Trust finances are beekeeping, agro-forestry, non-timber forest products, and ecotourism

There are other trust funds in Uganda at various stages of development The Kibale Trust involved a land purchase using USAID funds, and the setting aside of the land to be managed so as to maximize wildlife use benefits for a local community The Wildlife Education Centre Trust, the latter supported by USAID and Zoo/Atlanta, created a financial mechanism to sustainably manage the zoo in Entebbe Arrangements to set up a National

Desertification Fund (UNSO/UNDP supported) are nearing completion A National Environment Fund (NEF), provided for under the Environment Statute, is under discussion and development (see Quintela and Ntambweki, 1996) The NEF is intended to be an umbrella fund that some see as subsuming the other environmental trust funds already created and those planned for the future Each could have a separate funding window and identity under the umbrella NEMA views the NEF as contributing to its sustainability once the EMCBP ends The Wildlife Statute also provides the legal basis for establishing a Wildlife Fund USAID's APE/GMU is planning to establish an endowment fund that will allow the GMU's grants program to continue following the termination of APE

Trusts and endowment funds have become increasingly popular options as countries look for means to assure predictable flow of resources for ENR activities, and as donors seek to maximize the sustainability and effectiveness of their contributions Both countries and donors see trusts and endowments as ways to leverage their resources both through savvy investment of the original capital and through attracting other stakeholders, either nationally or internationally, to make additional donations or investments to build more capital for continued and/or expanded operation Besides addressing concerns regarding financial sustainability in funding of NEAP programs and activities, trust funds have other advantages for NEAP implementation First,

141

trusts can be designed to target long-term financial support to a designated set of beneficiaries for specific and desired ENR activities, thus helping to assure their continuation. Second, their management structure, through the creation of a board of trustees, enhances the effectiveness of financial oversight and has the potential to minimize the likelihood of abuse of office or financial malfeasance. Third, the trust mechanism allows the creation of an operating body with a staff and committee structure that incorporates broad representation of various ENR interest groups/stakeholders while remaining efficient and functional, a body that is simple and easily accessible to local community members, a body that is conducive to democratic governance, and one that is autonomous and can be relatively insulated from special interest "capture," political interference, and government control.

In the current international assistance world, endowments and trust funds are highly popular as mechanisms to address long-term funding and sustainability in a range of development sectors.²³ Because of the worldwide appeal of ENR protection and conservation, African countries with unique and rare biodiversity and ecosystems have the potential for attracting funds from a variety of sources, both public and private. It needs to be remembered, however, that competition for such funds is fierce. There are many good and worthwhile causes chasing after the same pool of charitable giving, foundation support, and donor monies. As Ellsworth (1997) elaborates, success on the "road to financial sustainability" will go to those who are the best prepared. This means knowing how to package a proposal for funding, having a capable and financially sound management entity, demonstrating the worth of proposed activities in terms that stakeholders understand and value, and managing the enterprise creatively and strategically with an eye to the long term and not the quick fix.

V. CONCLUSIONS

Considering the short life span of Uganda's NEAP and of the agency created to coordinate its implementation, NEMA, it is perhaps too early to attempt to make definitive judgments about performance. Indeed, the objective of this study was not to conduct an evaluative performance audit. A couple of general conclusions can be drawn nonetheless. First, looking at the "bottom line" for Uganda's NEAP in terms of the extent to which the six policy implementation conditions associated with success appear to be fulfilled, the balance sheet looks positive. To be sure, there are some problems to be faced, gaps to be filled, and uncertainties to be confronted, but much progress in launching NEAP implementation has been made. Second, compared to other countries in Sub-Saharan Africa involved in implementing NEAPs or similar planning frameworks, Uganda's efforts are on course and impressive. In particular, the focus on operationalizing decentralization stands out.

The successes registered so far are praiseworthy, but should not be justification for relaxation of effort. The tasks that lie ahead are both challenging and complex, calling for concerted action on the part of all of the NEAP partners. This final section offers some thoughts on next steps and issues for the future for Uganda's NEAP.

A. NEXT STEPS FOR UGANDA'S NEAP

A number of the next steps to further NEAP implementation are well recognized and many of these are already planned or underway. The discussion here groups these into several categories of activities.

1. Legal and Regulatory Development and Refinement

Steps here are relatively clear-cut, and include such items as 1) issuing the finalized EIA guidelines and regulations and elaborating other regulations and standards called for in the Environment Statute, 2) reviewing existing sectoral legislation to identify current provisions on which NEAP implementation modalities could be based, to uncover legal and regulatory gaps, and to adapt sectoral laws to fit the provisions of the Environment Statute, 3) harmonizing the inconsistencies and confusion around centralized and decentralized legal and regulatory responsibilities of different levels of government, 4) and beginning to develop district-level environmental by-laws and ordinances. NEMA has added to its legal staff in order to move ahead on these steps more expeditiously. Further down the implementation path in this category will come testing and refinement of regulations through application and (potentially) court cases and legal challenges.

2. Capacity-Building

This category of next steps links to the sequencing issues discussed previously. Capacity constraints limit implementation at the central, district, and local levels. Donor support is critical here in providing the basic resources that allow staff to be hired and to perform, vehicles and equipment to be purchased and operated, skills training to be undertaken, and so on. There is a tendency to assume that many capacity gaps can be filled through awareness and training. While these are necessary aspects of capacity-building, they are not sufficient. Other related factors, such as incentives and organizational structures and procedures, also need consideration.

The process side of capacity-building is important too. Process capacity has two aspects. It refers to a skill category, namely the ability to design and manage consultative and managerial process, which can be addressed through training and on-the-job coaching. It also can be considered a by-product of collaborative effort, that is, a synergy-producing dynamic that emerges as people work together to solve problems. This latter implies that some of the capacity required for NEAP implementation cannot be encapsulated in "bite-size" training modules, but will grow out of the ongoing experience of implementation that can build what is called "social capital," or a reservoir of shared learning and trust that can be drawn upon in the future for effective implementation.²⁴

3. Organization and Procedures

This category addresses a range of organizational and procedural concerns, these are related to capacity. First is the need to streamline and make operational the structures provided for by legislation and/or created under various administrative arrangements to facilitate NEAP implementation, for example the various district and local committees, the ELUs, and UWA

This will help to address some of the duplication and overlap among various committee structures included in ENR legislation, as well as narrow the gap between administrative designs that look good on paper, but because of limited capacity are not operationally feasible. A second step is clarifying the operational meaning of NEMA's coordination role, and of the linkages among other NEAP implementing partners. As the previous discussion pointed out, the NEAP faces a certain amount of confusion regarding coordination. Part of this clarification process involves a review of the expectations placed on NEMA, some of which are excessive and ill-founded. A third step deals with expanding the role of NGOs and civil society groups in implementation, and looking for opportunities to involve the private sector as well. Taking this step will help with capacity problems by matching tasks to the actors most capable to carrying them out, with assuring that NEAP implementation continues to build upon participatory and inclusive practices, and with the ongoing need to maintain stakeholder support for NEAP policies and programs.

4. Sustainability

A fourth set of next steps revolves around sustainability. The first step here focuses on NEMA and deals with priority-setting, trying to do everything will not lead NEMA to be effective or sustainable. The Authority has already gone through a strategic planning exercise, so the step to be taken is sticking to the priorities identified, while monitoring the appropriateness of the choices made. Second, a needed step is to begin now to think about what changes in NEAP implementation will be likely to translate time-bound donor assistance into coherent and sustainable ENR structures and programs, and to identify what adjustments could be made to increase the chances of sustainability. Again, NEMA has already done some thinking in this area, but other NEAP partners, including donors, need to be involved as well. Third, a more coherent, integrated approach to the various trust and endowment funds in existence or planned should be considered, because of the risk of competition among each other. Finally, Uganda, like many countries, is engaged in a variety of planning exercises, some environmentally focused, such as the desertification strategy, and others more broadly oriented, like the recently launched National Long Term Perspective Studies project expected to chart Uganda's development path to the year 2025. NEMA needs to assure that the NEAP articulates appropriately with these other planning exercises and vice versa. Failure to do so risks creating debilitating competition for policy-makers' attentions and for resources, as well as contributing to piecemeal planning approaches.

B. ISSUES FOR THE FUTURE

This section raises a few issues of a broader nature than the next-steps discussion. They apply to Uganda's NEAP but are not necessarily issues restricted to Uganda. NEAPs and ENR policies and programs worldwide confront these issues.

1. Maintaining ENR as a Policy Priority

Policies have what can be thought of as a lifespan, and some policies live longer than others. An issue for NEAPs in general is keeping the environment on the national policy agenda for the long-term, that is, long enough for ENR results and impacts to be achieved. Policy cycles in all countries revolve around political timetables, and the policy choices that generate attention and support result from a near constant dynamic of interest group competition and negotiation. Uganda has many competing priorities and scarce resources, and the NEAP faces the problem of slipping to a lower priority on the government policy agenda. Uganda is pursuing an ambitious variety of policy changes, e.g., structural adjustment, economic liberalization, civil service reform, decentralization, constitutional reforms, and privatization. Many of these are high-priority programs with much more immediate pay-offs compared to the NEAP.

Donor funds have the effect of maintaining government interest in the NEAP, but this raises commitment and long-term sustainability questions. Opinions were expressed during the interviews that if it were not for World Bank and other donor support, NEAP implementation would be difficult if not impossible. Doubts and concerns were expressed about what will happen once the World Bank's EMCBP comes to an end. In the final analysis sustainable NEAP implementation strategies will be those that succeed in creating champions who can mobilize and energize an ongoing national constituency that pushes ENR management up the national priority ladder and keeps it there. This is not an easy task over the long-term.

As remarked by observers in Uganda and elsewhere the tensions inherent in ENR policy and the trade-offs necessary for sustainable use often pit various groups in society against each other. The participatory spirit of NEAP preparation risks evaporating during implementation because when actions begin to be taken on the ground, the gap between espoused principles and what people are really prepared to do is revealed. So the question arises, how can ENR problems and policies be cast so as to maximize the likelihood that concerted and collaborative action will be taken, rather than engender particularistic resistance from elites and/or special interests?

Related here is the question of how the interests of local resource users in ENR consumption can be meshed with the larger interests of the common good in ENR protection and conservation. NEAP policies confront the difficult-to-manage characteristics of common-pool resources, such as forests, groundwater basins, fisheries, grazing lands, and the air we breathe. These resources are at risk of overexploitation, the classic "tragedy of the commons" dilemma (see Ostrom et al., 1994). A significant amount of analysis and practical application directed at this question has taken place, much of it within the framework of NEAPs, to address overexploitation and sustainable use at the local level. But it is important to recognize that there may be situations where the interests of local people will clash with the larger national ENR agenda. So if local sustainable use is the guiding principle behind NEAPs, over the long-term policy decisions may carry the risk of whittling away at resource conservation. Is it possible for NEAPs to put in place linking and/or mediating structures and processes that can assure some kind of balance?²⁵

2. Decentralization and ENR

Historically, ENR policies and their implementation across Africa have evolved from the government-declared central monopoly over control of resources, where resource users were legally alienated from their sources of livelihood, toward devolved control and co-management (Brinkerhoff with Honadle, 1996). The institutional and administrative frameworks appropriate for these new approaches have tended to lag for a variety of reasons: because governments have been reluctant to dismantle their monopolies, because institutional change is a slow and often threatening process, and because capacity gaps take time to fill. As a result, the implementation landscape for NEAPs across Africa reveals uneven progress and a general bipolar pattern of activities. At the center, orchestrated by some sort of coordinating entity, is one concentration of initiative and effort usually dominated by public sector entities. At the community level there is another hub of activity, where NGOs and civil society groups take the lead and in many cases the state is a minor or absent player. This pattern sets up one or the other (or sometimes both) of two dynamics: a) a disconnect between ENR activities at the local and central levels, where things happen independent of each other, and/or b) conflict between the levels, where the goals and interests of one level predominate over the other, creating win-lose situations.

Decentralization is one of the strategies that seeks to bring together these two poles, and to give effect to policy decisions to de-monopolize ENR management. Uganda is at the forefront of African nations pursuing decentralization. As noted throughout this study, NEAP implementation involves decentralization. Beyond the immediate next steps on clarifying the administrative relationships among various government levels, however, there is a broader issue associated with decentralization, and this has to do with institutional pluralism (see Cohen and Peterson, 1997). Particularly for complex tasks for which no specific "blueprint" on how to do the job exists, and for which capacities are limited, expanding the range of participating organizations to deal with the task can improve performance. Decentralization strategies that reallocate responsibilities to a broader set of partners, not just from a central public agency to a local one, are called for. There is some interesting emerging evidence that suggests that institutional pluralist decentralization can alter the bipolar pattern of local-versus-center. This results in the creation of triangular relationships among central government, local government, and civil society organizations, which can result in a lower level of win-lose conflicts, a more stable balance of interests, and better performance (Tendler, 1997).

Uganda's NEAP has faced up to this issue more squarely than most. Its emphasis on decentralized linkages from center to community, through districts and municipalities, and an expanded role for NGOs and civil society warrant attention and further analysis. Among the interesting questions to be answered are, how far can pluralist decentralization of NEAP activities go in a situation where ongoing ethnic cleavages are present? And, over time, how can the state's central organs best counterbalance the spatial inequities that will emerge over time before they fuel conflict, either among districts or ethnic groups?

3. Democratization and ENR Policies

A final issue to be raised here, closely related to pluralist decentralization, has to do with the links between democratization and ENR policies. A growing stream of investigation is looking at these connections, and debating their particulars (see Brinkerhoff and Veit, 1997). In Uganda's case the participatory processes used in NEAP preparation and subsequent implementation, and the drive toward pluralistic decentralization, both derive from and contribute to the reinforcement of democratizing tendencies in the NRM government. There are important implications for ENR policy formulation and implementation in the growth of civil society, the move from isolated instances of local face-to-face participation toward larger representational bodies, the broader aggregations of interest groups around ENR issues and the beginnings of advocacy and lobbying. These trends suggest that new coalitions of ENR stakeholders may emerge with the potential to change the pace of NEAP implementation, and to inject new voices into ENR policy debates. They also hold the possibility that through NEAP implementation, citizens will develop new interaction patterns with government at all levels, and that features associated with democratic governance, such as transparency, accountability, responsiveness, and accommodation of the interests of marginalized groups, will be reinforced and strengthened.

ENDNOTES

1 For details on Uganda's environment see MNR (1994). NEMA is in the process of finalizing an updated State of the Environment Report.

2 It is interesting to note the similarities between the NCS of 1985 and the NEAP of 1995. Despite these similarities, however, there are also some sharp contrasts which provide important insights in understanding the philosophy and implementation strategies for the NEAP. In some important respects the NEAP addresses the gaps that the NCS overlooked, particularly the need to integrate development and conservation.

3 For background on decentralization in Uganda see Nsibambi (1993). Regarding policy statements on decentralization and the NEAP see Odwedo (1995 and 1996). For broader analyses of administrative decentralization see Smith (1993) and Cohen and Peterson (1997).

4 See Annex C for NEMA's role and functions, as laid out in the Environment Statute.

5 Examples are the Kibale Forest Project, Ruwenzori Mountains Conservation and Development Project, CARE/Development Through Conservation Project, International Gorilla Conservation Program, Lake Mburo National Park Support and Community Conservation Project, and Semliki and Kibale Forest Conservation Project.

6 Sources for this box include Ogwang and DeGeorges (1992), African Wildlife Foundation (1994), and interviews with the Lake Mburo National Park Senior Warden and members of his staff.

7 Rukuba-Ngarza and Hitchcock (1995) discuss these issues relative to the development of district-level by-laws. For broader, Africa-wide perspectives see, for example, Brinkerhoff with Honadle (1996) and Western and Wright (1994).

- 8 This program now in its third phase was instrumental in building awareness of wetlands issues and in getting the National Wetlands Policy formulated and approved
- 9 This risk is a real one and something that other countries have encountered For example Madagascar's counterpart to NEMA ONE (Office National de l'Environnement) has been criticized for trying to do everything related to Madagascar's NEAP and thus failing either to set realistic priorities or build broadbased capacity for ENR management
- 10 The Constitution however, provides for two or more districts to cooperate in areas of development or any other matters (Article 173 (I) also see the fifth schedule)
- 11 Another effort relevant to capacity-building is the World Bank-supported civil service reform project, which has reduced the number of public employees from 320,000 in 1990 to 143,000 in June 1995 (see World Bank, 1995b, Kalema et al., 1996) A key premise of civil service reform projects is that wage bill reductions free up resources that can increase performance capacity by allowing for fewer but better motivated staff (see Langseth and Mugaju, 1996)
- 12 During the NEAP design, some technical assistance was provided to districts regarding local-level ENR management for example from the World Resources Institute (see Veit 1994)
- 13 As one survey of people's perceptions of ENR reports most people have somehow heard about the broader environmental issues at stake in Uganda today even though it appears that they are not doing enough to correct what has gone wrong' (Tukahirwa 1992: 13)
- 14 They have also earned NEMA staff some criticism for being 'publicity hounds' and for responding to crises rather than setting and sticking to priorities
- 15 See for example Kamugasha (1990) on Queen Elizabeth Park, and Etoori (1990) on the Ruwenzori mountains Ogwang and DeGeorges (1992) discuss these two parks as well as Lake Mburo, Bwindi and Kibale Forest The chapters in Western and Wright (1994) discuss this issue with examples from other African countries
- 16 This same sequence can be found in other NEAPs as well For example, the World Bank's support to Madagascar's NEAP in the Environment Program 1 and 2 lays out an identical path toward achieving NEAP objectives
- 17 The technical assistance activities and applied research products of the IPC Project illustrate the application of strategic management approaches and techniques in a wide range of policy implementation situations For overviews see Brinkerhoff (1996b and 1996c) For specific examples of techniques and tools see for example Crosby (1991 and 1992) IPC has an internet website at <http://ipc.msi-inc.com>, which offers additional information
- 18 Experience around the world and in Africa strongly suggests that such ignorance should not be automatically assumed See Ghai and Vivian (1995), Western and Wright (1994)
- 19 A few interviewees perceived NEMA as controlling, but this appears to be a minority perspective
- 20 See the sample indicators in Borrini-Feyerabend (1997)
- 21 Indicators here derive from the tools and techniques of strategic management referred to earlier in this report See the references in endnote No. 17
- 22 A trust fund can be defined as money, stocks, bonds or other property that is held in a separate account for a designated beneficiary or beneficiaries or for some specified purpose The person or institution that actually holds legal title to the assets is the trustee An endowment is a particular type of trust fund It is one in which only the interest on investment income is spent but not the principal, the Bwindi Trust is of this type In other kinds of trust

funds, the principal may be drawn down upon either until it is exhausted (a sinking fund) or it can be periodically replenished from additional grants or from dedicated fees or taxes. In Uganda a trust fund can be established in at least two ways: by legislation or by deed.

23. Several years ago, USAID and the World Bank's Special Program for African Agricultural Research (SPAAR) launched the Sustainable Financing Initiative (SFI) to help African agricultural research and natural resources institutions explore options for increasing their financial sustainability. SPAAR maintains a website for SFI at the following address: www.worldbank.org/html/aftr/sfi.htm

24. There is a great deal of literature on social capital. For one useful source relevant to the discussion here see Evans (1996).

25. This issue is as relevant for the industrialized world as it is for developing countries. See for example, Yaffee (1994), who analyzes the US Forest Service's experience with seeking to implement the Endangered Species Act to preserve the spotted owl, which pitted logging interests in the heavily resource-dependent economies of the Pacific Northwest against a national-level coalition of environmentalists and preservationists.

BIBLIOGRAPHY

- African Wildlife Foundation 1994 "Support to Community Conservation for Uganda National Parks with a Special Focus on Lake Mburo National Park Volume I Proposal" Nairobi, Kenya Author, November
- Ahene, Rex 1994 "Property Tax Modifications to Promote Incentives for Natural Resource Management and Land Stewardship" Gainesville, FL Tropical Research and Development, Inc Report for USAID/Kampala, August
- Apter, David E 1995 "Democracy for Uganda A Case for Comparison" Daedalus Vol 124, No. 3, pp 155-190
- Borrini-Feyerabend, Grazia (ed) 1997 Beyond Fences Seeking Social Sustainability in Conservation Volume 1 A Process Companion Gland, Switzerland. IUCN, The World Conservation Union
- Brett, E A 1994 "Rebuilding Organisation Capacity in Uganda Under the National Resistance Movement" Journal of Modern African Studies Vol 32, No 1, pp. 53-80.
- Brinkerhoff, Derick W 1996a "Coordination Issues in Policy Implementation Networks An Illustration from Madagascar's Environmental Action Plan" World Development Vol. 24, No. 9, pp 1497-1510
- Brinkerhoff, Derick W 1996b "Process Perspectives on Policy Change Highlighting Implementation" World Development Vol 24, No 9, pp 1395-1403
- Brinkerhoff, Derick W 1996c "Technical Cooperation for Building Strategic Policy Management Capacity in Developing Countries" International Journal of Technical Cooperation Vol 2, No 1, pp 1-18
- Brinkerhoff, Derick W and Arthur A Goldsmith 1992 "Promoting the Sustainability of Development Institutions a Framework for Strategy" World Development Vol 20, No 3, pp 369-383
- Brinkerhoff, Derick W with George Honadle 1996 Co-Managing Natural Resources in Africa Implementing Policy and Institutional Changes in Five Countries Washington, DC U S Agency for International Development, Implementing Policy Change Project, Monograph No. 4, October
- Brinkerhoff, Derick W and Peter G Veit 1997 "Democratic Governance and Environmental/Natural Resources Policy in Africa Exploring the Linkages." Washington, DC U S Agency for International Development, Implementing Policy Change Project, and World Resources Institute, Natural Resources Policy Consultative Group for Africa Draft, October.

- CARE 1997 "A Proposal for an Institutional Framework for Natural Resources Management in South-West Uganda (Kabale, Kisoro and Rukungiri Districts)" Kabale CARE/Uganda. Development Through Conservation Project, 3rd Draft
- Carew-Reid, Jeremy, Robert Prescott-Allen, Stephen Bass, and Barry Dalal-Clayton 1994 Strategies for National Sustainable Development A Handbook for their Planning and Implementation. London Earthscan Publications.
- Cohen, John M and Stephen B Peterson 1997 "Administrative Decentralization A New Framework for Improved Governance, Accountability, and Performance" Cambridge, MA Harvard Institute for International Development, Discussion Paper No 582, May
- Crosby Benjamin 1991 "Strategic Planning and Strategic Management What Are They and How Are They Different?" Washington, DC U S Agency for International Development, Implementing Policy Change Project, Technical Note No 1
- Crosby, Benjamin 1992 "Stakeholder Analysis A Vital Tool for Strategic Managers" Washington, DC U S Agency for International Development, Implementing Policy Change Project, Technical Note No 2
- Cullimore, Charles 1994 "Uganda the Making of a Constitution" Journal of Modern African Studies Vol 32, No 4, pp 707-711
- Dorm-Adzobu, Clement 1995 New Roots Institutionalizing Environmental Management in Africa Washington, DC World Resources Institute
- Ellsworth, Lynn 1997 "The Road to Financial Sustainability How Managers, Government, and Donors in Africa Can Create a Legacy of Viable Public and Non-Profit Organizations" Bethesda, MD Abt Associates Inc Agricultural Policy Analysis Project, Phase III, Research Report No 1030, September
- Etoori, Dorothy K 1990 "The Ruwenzori Mountains Conservation and Development Project" In Agnes Kiss (ed) Living with Wildlife Wildlife Resource Management with Local Participation in Africa Washington, DC World Bank, Africa Technical Department Series, Technical Paper No 130, pp 111-115
- Evans, Peter 1996 "Government Action, Social Capital and Development Reviewing the Evidence on Synergy" World Development Vol 24, No 6, pp 1119-1132
- Ghai, Dharam and Jessica M Vivian (eds) 1995 Grassroots Environmental Action People's Participation in Sustainable Development London Routledge

- Gibson, J Eugene 1996 "Environmental Bye-Law Development in Kasese District " Gamesville, FL Tropical Research and Development, Inc Report for USAID/Kampala, March
- Gow, David D 1992 "The Uganda NEAP Prioritizing Issues for a National Environmental Policy " Washington, DC World Resources Institute, for USAID/Kampala, July 3
- Greve, Albert M , Julian Lampietti, and François Falloux 1995 National Environmental Action Plans in Sub-Saharan Africa Washington DC World Bank, Environmentally Sustainable Development Division, Africa Technical Department, Building Blocks Series, Paper No 6, June
- Johns, Andrew D (ed) 1989 Conservation for Development Proceedings of the First Symposium on Conservation and Development in Uganda, 16-17 January 1989 Mweya, Uganda Makerere University Biological Field Station
- Kakuru, Kenneth, Benedict Mutyaba Brian Rohan, and Anne Ziebarth 1995 "Roles and Best Practices of the Central Government of Uganda in Environmental Management " Washington, DC World Resources Institute, August 22
- Kalema, William S , James Musinguzi, Benjamin Kamugasha-Nganwa, Mary Consolate Muduuli, Rosemary Ssenabulya, Anthony Okech, Rehema Jingo-Kakonge, and Lydia Ochieng-Obbo 1996 "Uganda National Capacity Assessment " Kampala Uganda Manufacturers Association Consultancy and Information Services Report to the World Bank, African Region, June
- Kamugasha, Benjamin N 1990 "Uganda Queen Elizabeth Park " In Agnes Kiss (ed) Living with Wildlife Wildlife Resource Management with Local Participation in Africa Washington, DC World Bank, Africa Technical Department Series, Technical Paper No. 130, pp 59-67
- Kamugasha, Benjamin N 1987 "Resource Conservation and Environment Protection in Uganda A Survey of the Effect of Land Tenure Systems and the Law " New York United Nations Environment Program, April
- Khadiagala, Gilbert M 1993 "Uganda's Domestic and Regional Security Since the 1970s " Journal of Modern African Studies Vol 31, No 2, pp 231-255
- Kiggundu, Moses N 1996 "Integrating Strategic Management Tasks into Implementing Agencies: From Firefighting to Prevention " World Development Vol. 24, No 9, pp. 1417-1431
- Kisubi, Mohammed 1996 "The Process of Decentralization " In Petter Langseth and Justus Mugaju (eds) Post-Conflict Uganda Towards an Effective Civil Service Kampala: Fountain Publishers, pp 83-107

52

- Langseth, Petter and Justus Mugaju (eds) Post-Conflict Uganda Towards an Effective Civil Service Kampala Fountain Publishers
- Leonard, Robert A 1997 “An Assessment of the Uganda Local Governments Act of 1997 ” Kampala USAID. Draft Report
- Matt, Lisa M , Ed Karch, Lorna M Butler, J E Clarke, and Tom Kangwagye 1995 “Action Plan for the Environment, Mid-Term Evaluation (Project No 617-0124[PA] 617-0123[NPA]) Arlington, VA International Science and Technology Institute Inc Final Report, Prepared for USAID/Uganda.
- Mazmanian, Daniel A and Paul A Sabatier 1989 Implementation and Public Policy Lanham, MD University Press of America.
- Ministry of Natural Resources (MNR), National Environment Action Plan Secretariat 1995. The National Environment Action Plan for Uganda Kampala Government of Uganda, June
- Ministry of Natural Resources, National Environment Action Plan Secretariat 1995 The Environment Investment Program Kampala Government of Uganda, NEAP Vol II, Part A June
- Ministry of Natural Resources, National Environment Action Plan Secretariat 1994 The National Environment Management Policy for Uganda Kampala. Government of Uganda, January
- Ministry of Natural Resources, National Environment Information Centre 1994 State of the Environment Report for Uganda Kampala Government of Uganda
- Muramira, Telly Eugene 1995 “Minimum Data Requirements for District Level Planning ” Kampala, Uganda National Environment Information Centre, November-December
- National Environment Management Authority 1997 “Strategic Workplan for the Period 1997-2001 and Annual Workplan for the Year 1997/98 Volume I - Main Report ” Kampala. Author, May
- NEAP, Regional Activity Workgroup 1993 “Decentralizing Natural Resource Management in Uganda Draft Guidelines for Environmental Management at District and Local Community Levels.” Kampala Author, July
- Nsibambi, Apolo 1993 “The Facilitators and Inhibitors of Decentralization of Power in Uganda, 1962-1993 ” Kampala, Uganda Makerere University Institute of Social Research, University of Dar Es Salaam Institute of Development Studies, Maputo Higher Institute for International Relations, Friedrich Ebert Foundation, and DANIDA Paper presented at the Regional Conference on Local Self Governance, People’s Participation and Development Preconditions for Peace and Stability, August 30-September 4

- Odwedo, Martin. 1995 "Decentralisation of Natural Resource Management and the Role of the District as Planning Units " Mbale, Uganda Paper presented at the Mbale District Environment Profile Workshop, September 6-7
- Odwedo, Martin 1996 "Decentralisation of Natural Resources and Environment Management in Uganda The Concept and the Way Forward " Kampala, Uganda National Environment Management Authority Paper presented at the Workshop to Launch the National Environment Action Plan, the National Environment Management Policy and Statute, and the National Environment Management Authority, July 30
- Ogwang, David Abura and Paul Andre DeGeorges 1992 "Community Participation in Interactive Park Planning and the Privatization Process in Uganda's National Parks " Kampala USAID and Uganda National Parks, April
- Omara-Otunnu, Amu 1992 "The Struggle for Democracy in Uganda " Journal of Modern African Studies Vol 30, No 3, pp 443-463
- Ostrom, Elinor, Roy Gardner, and James Walker 1994 Rules, Games, and Common-Pool Resources Ann Arbor University of Michigan Press
- Quintela, Carlos E and John Ntambirweki 1996 "Issues and Options for Implementing a National Environmental Fund " Gainesville, FL Tropical Research and Development Inc , for USAID/Kampala and the National Environment Management Authority, July
- Redclift, Michael 1995 "Sustainable Development and Popular Participation A Framework for Analysis " In Dharam Ghai and Jessica M Vivian (eds) Grassroots Environmental Action People's Participation in Sustainable Development London Routledge, pp 23-50
- Rukuba-Ngaiza, Nightingale and Laura Hitchcock 1995 "Environmental Bye-Law Development in Uganda Needs Assessment and Guidelines " Gainesville, FL Tropical Research and Development Inc , for USAID/Kampala and the National Environment Management Authority, January
- Smith, Brian C 1993 Choices in the Design of Decentralization. London. Commonwealth Secretariat, Management and Training Services Division
- Swartzendruber, J Frederick 1996 "Environmental Threats Assessment " Washington, DC World Resources Institute Report prepared for USAID/Kampala, July
- Tata, Gariv 1996. "Capacity Building " In Petter Langseth and Justus Mugaju (eds) Post-Conflict Uganda Towards an Effective Civil Service Kampala: Fountain Publishers, pp 126-143

54

- Tendler, Judith 1997 Good Governance in the Tropics Baltimore Johns Hopkins University Press
- Tukahirwa, Eldad M (ed) 1992 Environmental and Natural Resource Management Policy and Law Issues and Options Kampala and Washington, DC Makerere University, Institute of Environment and Natural Resources and World Resources Institute
- United Nations Environment Program 1988 Strategic Resources Planning in Uganda Nairobi UNEP, 10 volumes.
- U S Agency for International Development 1996 "USAID Country Strategic Plan for Uganda, FY 1997-2001 " Kampala USAID, November
- Veit, Peter G 1994 "From Crisis Management to Strategic Planning for Sustainable Development Sub-County/Town Planning Procedure and Process Guidelines " Washington, DC World Resources Institute, for USAID/Kampala and the NEAP Secretariat, August 8
- Western, David, and R Michael Wright, eds 1994 Natural Connections. Perspectives in Community-based Conservation Washington, DC and Covelo, CA Island Press
- Wollenberg, Eva and Carol Colfer 1997 "Social Sustainability " In Gracia Borrini-Feyerabend (ed) Beyond Fences Seeking Social Sustainability in Conservation Volume 2 A Resource Book Gland, Switzerland IUCN, The World Conservation Union, pp 115-118
- World Bank. 1995a "Environmental Management Capacity Building Project " Washington, DC World Bank, Africa Region Staff Appraisal Report, No 14015-UG, August
- World Bank 1995b "Institutional Capacity Building Project " Washington, DC World Bank, Africa Region Staff Appraisal Report, No 13610-UG, May
- World Bank 1995c "Uganda Bwindi Impenetrable National Park and Mgahinga Gorilla National Park Conservation " Washington, DC World Bank, Global Environment Facility Project Document, January
- Yaffee, Steven Lewis 1994 The Wisdom of the Spotted Owl Policy Lessons for a New Century Washington, DC Island Press

ANNEX A

IPC ANALYTIC FRAMEWORK

The Implementing Policy Change Project's multi-year, multi-country research study conducted for USAID's Africa Bureau has employed a common analytic framework throughout its various research activities. The study has adopted the perspective on examining policy implementation developed by Mazmanian and Sabatier, whose research on policy implementation in the U.S. has concentrated on elucidating the relationship between policy outcomes and three categories of variables: the problem the policy is intended to solve, the way implementation is structured and managed, and the sociopolitical and economic setting in which implementation takes place (Mazmanian and Sabatier, 1989: 18-48).

They define policy implementation as the process that runs from the development and 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 transformation 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). This definition emphasizes the importance of implementation as mediating between policy intent and outcomes, something that the IPC study wanted to underscore in looking at African NEAP and ENR experience. Further, it mirrors the process employed in most international development efforts, where interventions begin with problem analysis and solution design, and move to implementation in pursuit of a particular set of objectives. This fits closely, for example, with how NEAPs have come into being.

Mazmanian and Sabatier distill the findings of their field research into a set of six conditions associated with successful implementation (1989: 41-43). They offer these as a kind of heuristic checklist containing the following elements:

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 minimum veto points and adequate incentives for compliance,
 - supportive decision rules (e.g., appropriate authority and procedures),
 - adequate financial resources,
 - 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.

The first two conditions address the policy directive and the problem it engages, the third and fourth focus on organizational arrangements and managerial capacity for implementation, and the fifth and sixth consider the context for moving from intent to impacts. No policy in the real world reflects a situation where all six of these conditions are fully met, but the framework points decision-makers and implementors toward considering the broad range of factors that contribute to implementation success

51

ANNEX B

PERSONS CONTACTED

National Environment Management Authority

Mr Charles Akol	District Coordination Division
Dr Henry Aryamanya	Deputy Executive Director
Mr Emmanuel Mukanga	Public Awareness Programme
Prof John Okedi	Executive Director
Mr G B Rutangye	Education, Awareness, and Training
Mr Charles Sebukera	Information and Monitoring Division
Ms. Fortunate Sewankambo	Director, Policy, Planning and Legal Division
Mr Robert Wabunoha	Legal Advisor

Uganda Wildlife Authority

Ms Jane Anywar	Legal Officer
Dr Yakobo Moyini	Acting UWA Director, and Deputy Director, Planning, Monitoring, and Research
Mr Arthur Mugisha	Community Conservation Coordinator
Mr Joseph Serugo	Chief Park Warden, Lake Mburo National Park

Government Ministries and Agencies

Mr David Abura	PAMSU Coordinator, Ministry of Tourism, Wildlife and Antiquities
Mr E Dribidu	Coordinator, Water Resources Assessment Project, Directorate of Water Development, Ministry of Natural Resources
Mr Kabagamba-Kalusa	Permanent Secretary, Ministry of Natural Resources
Mr Charles Kiamanga	Planner, Kampala City Council
Mr Frederick Kigenyi	Deputy Commissioner, Department of Forestry
Mr Paul Mafabi	Manager, Ministry of Natural Resources, Uganda National Wetlands Programme
Mr Mugizi	Head, Environmental Liaison Unit, Kampala City Council
Dr Steven Muwaya	Ministry of Agriculture, Animal Industry and Fisheries (Desertification Convention)
Mr. Dick Nyeko	National Coordinator, Water Hyacinth Control, Ministry of Agriculture, Animal Industry and Fisheries
Mr Martin Odwedo	Ministry of Local Government, Office of Donor Coordination
Dr. David Ogaram	Commissioner, Ministry of Labour
Dr Orach-Meza	Director, Lake Victoria Environmental Management Programme

District Government

Mr Mathias Akabway	Resident District Commissioner, Mbale
Mr Edward Berinda	Production/Environment Committee Coordinator, Mbarara
Mr Joshua Esiepet	District Environment Officer, Tororo
Mr Johnson Gumisiriza	District Planner, Kabale
Ms Beatrice Lagada	Resident District Commissioner, Mbarara
Mr Francis Mukwana	Councillor, Mbale District
Mr Paul Musamali	District Environment Officer, Mbale
Mr Jaconious Musingwire	District Environment Officer, Mbarara
Mr. Tony Mwesigwa	District Security Officer, Mbale
Mr. Mwambu Namangala	LCV Chairman, Mbale District
Mr Godfrey Okut	Acting Chief Administrative Officer, Tororo
Mr Edward Onenerach	Project Manager, Mt Elgon Conservation and Development Project
Ms Pence Onzia	Chief Administrative Officer, Mbale
Mr J Sabuti	LCV Chairman, Mbarara
Mr Paul Sabuti	District Environment Officer Kabale

International Donor Agencies

Prof Thomas Babatunde	Resident Representative, UNDP/Kampala
Dr Albert Greve	Coordinator, Multi-Donor Secretariat, World Bank, Washington
Ms Joanne T Hale	Deputy Director, USAID/Kampala
Mr Randolph Harris	Resident Representative, World Bank, Uganda
Ms Alexandra Karekaho	Staff Member, UNDP/Kampala
Ms Nightingale Nantamu	Strategic Objective 2 Team, USAID/Kampala
Prof Joesph Opio-Odingo	Staff Member, UNDP/Kampala
Mr Ray Victorine	Coordinator, Grants Management Unit, Action Program for the Environment (USAID)

Universities and Training Institutes

Mr James Kalebbo	Director, Uganda Management Institute
Dr. P M B Kasoma	Acting Director, Makerere Institute of Environment and Natural Resources (MIENR), Makerere University
Prof Derek Pomeroy	Deputy Director, MIENR, Makerere University

Non-governmental Organizations

Mr Steve Cavell	Mgahinga-Bwindi Impenetrable Forest Conservation Trust, Kabale
Mr Franz Fischer	Technical Advisor, National Adult Education Association
Ms Edith Kabesume	Programme Secretary, Wildlife Clubs of Uganda
Mr Frederick M Kabuye	Director -URDT Institute, Uganda Rural Development and Training Programme
Ms Pauline Kagwa	Secretary, Joint Energy and Environment Projects
Mr. Samuel M Karuhanga	Institutional Development Advisor, CARE/DTC Project, Kabale
Mr Robert Kugonza	Environmental Educator, National Adult Education Association
Ms Susan Mubbala	Programme Officer, Environmental Alert
Mr Alex Muhweezi	Head, Country Programme, IUCN

Mr Parmenas W Ogwal Programme Director, The Auxiliary Foundation
Mr Geoffrey Oyai Programme Director, National Adult Education Association
Mr Yasine Tumwine Secretary General, NEIA, National Youth Organisation for Democracy
Mr Frank Turyatunga Agricultural Cooperative Development International, (formerly in NEMA National Environmental Information Center)

Private Sector

Mr Ndyakira Amooti Senior Writer-Environment, The New Vision
Ms Helen Bugaari Staff Member, Aquatics Unlimited
Dr William Kalema Uganda Manufacturers Association, NEMA Board of Directors
Mr Tom Moorhouse Technical Coordinator, Aquatics Unlimited
Ms Charles Owor Staff Member, Aquatics Unlimited

Local Communities (group interviews)

Bendo Community 51 members
Abur Community 178 members

ANNEX C

NEMA'S ROLE AND FUNCTIONS

7 (1) The functions of the Authority are--

- (a) to coordinate the implementation of Government policy and the decisions of the Policy Committee,
- (b) to ensure the integration of environmental concerns in overall national planning through co-ordination with the relevant ministries, departments and agencies of Government,
- (c) to liaise with the private sector, intergovernmental organizations, non-governmental agencies, governmental agencies of other states on issues relating to the environment,
- (d) to propose environmental policies and strategies to the Policy Committee;
- (e) to initiate legislative proposals, standards and guidelines on the environment in accordance with this Statute,
- (f) to review and approve environmental impact assessments and environmental impact statements submitted in accordance with this Statute or any other law,
- (g) to promote public awareness through formal, non-formal and informal education about environmental issues,
- (h) to undertake such studies and submit such reports and recommendations with respect to the environment as the Government of the Policy Committee may consider necessary,
- (i) to ensure observance of proper safeguards in the planning and execution of all development projects, including those already in existence that have or are likely to have significant impact on the environment determined in accordance with Part V of this Statute,
- (j) to undertake research, and disseminate information about the environment,
- (k) to prepare and disseminate a state of the environment report once in every two years;
- (l) to mobilize, expedite and monitor resources for environmental management;
- (m) to perform such other functions as the Government may assign to the Authority or as are incidental or conducive to the exercise by the Authority of any or all of the functions provided for under this Statute