

**A Comparative
Analysis of
Public Policies
Affecting Natural
Resources and the
Environment:**

**Interest Group
Politics in the
Eastern Caribbean**

DESFIL

Development Strategies for Fragile Lands
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**A Comparative Analysis of Public Policies Affecting
Natural Resources and the Environment: Interest
Group Politics in the Eastern Caribbean**

by

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FOREWORD

This research report by John K. Gamman is based on his doctoral research in the Department of Urban Studies and Planning at the Massachusetts Institute of Technology. The research was supported in part by Development Strategies for Fragile Lands (DESFIL), a centrally funded project of the Science and Technology and Latin America Bureaus of the United States Agency for International Development. DESFIL assists those Bureaus in their regional programs to arrest the degradation of natural resources while encouraging the increased production of food and fuel for income generation. Tasks of specific interest to DESFIL include the development of institutional arrangements that promote and facilitate the sustainable use of fragile natural resources and the analysis of related policies. The sponsorship of research that focuses specifically on these and other aspects of the general problem of sustainable production and use of fragile lands is a regular feature of DESFIL's activities.

Dr. Gamman exhaustively examines development projects from Barbados, St. Lucia, and St. Kitts. Each project site was the subject of competing uses. In each case, already existing policies and laws designed to protect natural resources and the environment failed. These failures are analyzed, and lessons, recommendations, and an action plan for the future are drawn from them. The case studies show that, in the development of resources subject to competing uses, there are stakeholders, interest groups, and decision makers, and that there is less than a 1:1 correspondence between the three. A description of the characteristics of these interest groups is offered. Interest group politics in the Eastern Caribbean are described. Some interest groups, including major stakeholders in the nondegrading use of natural resources, are excluded from decision making, and this exclusion results in the failure of policies or laws designed to protect the environment and natural resources.

Dr. Gamman concludes that the interests of nondegrading resource use in the economic and social development of the Eastern Caribbean require what he terms a "stakeholder analysis" prior to the implementation or even the planning of development projects. Once stakeholders are identified, they must be actively included in project planning and implementation. His action plan also recommends environmental education, and the strengthening of nongovernmental environmental stakeholders. The careful analysis of institutional functioning in three countries is a keystone in DESFIL's contributions on the topic of appropriate institutional arrangements.

Michael Hanrahan
Program Coordinator
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PREFACE

In recent years, national governments in developing countries and development assistance agencies have adopted new policies to protect limited or fragile natural resources. These policies are often required by the agencies as a condition of development assistance. In many instances these policies are failing. This paper explores one principal reason this is happening.

An underlying assumption of this paper is that in most instances it is appropriate to develop natural resources to provide for economic opportunities. It is not assumed that limited or fragile natural resources should necessarily be left undeveloped in their natural state, but when development does occur, natural resources that are affected should be protected to prevent needless damage, which in turn may hinder future economic growth.

I hypothesize that it is the relationship between interest groups in a country, and a policy-making process that excludes key stakeholders, that cause decisions to be made that override environmental policies. The failure of environmental policies can be explained by examining how interest groups use their relationships with political leaders to exert control over the development process.

National political leaders want to maintain their power, and do this by supporting large development projects that are environmentally destructive but highly visible to voters. Bureaucrats want to enforce policies to protect fragile natural resources, but are dependent on politicians for their jobs. This prevents them from enforcing environmental policies. Major stakeholding groups, including resource users (farmers, herders, fisherman, and charcoal producers) and local nongovernmental organizations (NGOs), are excluded from the decision-making process. By examining the relationships between these groups, we can identify some obstacles that hinder environmental policy implementation.

This paper draws upon three case studies from the Eastern Caribbean to address the following three questions:

- What national environmental policies were or were not implemented in each case?
- Which key interest groups were involved in each case, and how did they influence the way environmental policies were or were not implemented?
- How can institutional arrangements between development assistance agencies and host countries be improved to enhance environmental policy implementation?

APPROACH TO THE CASE STUDIES

The case studies describe what happened when attempts were made to protect natural resources associated with three large development projects in the Eastern Caribbean. The projects are located in Barbados, St. Kitts, and St. Lucia. To gather evidence to support my major ideas, I have used cross-national comparative case research, based on information gathered in the three countries and international organizations headquartered in Washington, D.C.

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The methodology used to create the cases is described by Robert K. Yin in *Case Study Research: Design and Research Methods*, Beverly Hills, Sage Press, 1984. Several sources of information were used to create the chain of evidence in each case, including open-ended interviews, public and private reports, newspaper archives, and my own experience living and working in the region. The evidence was then organized into an annotated chronology of key events and summaries of the major themes and lessons that emerged from each case. After the evidence was collated, I refined my major working hypotheses that formed the framework for the paper. The collections of the national libraries in Barbados and St. Lucia were useful in providing background documents relating to natural resource management, economics, culture, and politics. The library at the National Research and Development Foundation in St. Lucia was a valuable source of local information. Several national and international NGOs also provided background information. Complete citations are included in the text of this report with additional references in the bibliography that accompanies it.

I encountered some difficulties during the field research, because of the politically sensitive nature of the cases and my participation in policy dialogues that are generally not open to outsiders. All of the cases were extremely controversial due to the large size of the projects; the political stakes involved; and, in two instances, substantial opposition to them. But, I found that it was a major benefit to be in the countries when the controversies were unfolding. Insights into the public policy process were easier to obtain by examining them through the lenses provided by the cases.

To maintain my objectivity, interviews were conducted with people from a variety of backgrounds representing a wide range of opinions about the relationship of economic development and environmental management. I presented myself as an outside participant-observer, gathering factual data to describe why environmental policies were failing in the three countries. My affiliation as a research associate with the Centre for Resource Management and Environmental Studies at the University of the West Indies, Barbados, gave me the credibility that was required to gain access to the people I interviewed. In most instances this affiliation, combined with my role as an outside observer, was advantageous. It created the legitimacy that was needed for people to share confidential information about how their political systems work.

To gather the information needed to construct the cases, I interviewed 68 people in four countries: Barbados, St. Lucia, St. Kitts, and the United States. Among those interviewed were senior civil servants, appointed and elected politicians, representatives of NGOs, and representatives of the three donor agencies involved in the cases — the U.S. Agency for International Development, the Inter-American Development Bank, and the Organization of American States. With follow-up interviews to check facts and keep track of events in the cases as they unfolded, I made more than 100 separate contacts with the 68 parties.

Primary sources in each country received drafts of the cases and were asked to verify the chronology of key events. The resulting comments helped me refine the cases. All interviews were kept confidential to protect my sources. In the following discussion of the cases, the reader will sometimes see a letter followed by a number in parentheses (for example, B 12, SL 3 or SK 6). These refer to the specific interview from which the piece of information was taken.

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EXECUTIVE SUMMARY

Environmental policies adopted by developing countries and development assistance agencies often fail. This report presents the hypothesis that one reason this happens is the relationship between interest groups in a country, and a policy-making process that excludes key stakeholders. As a result, decisions are made that override environmental policies. This paper describes the importance of understanding the role of interest groups in the public policy process and, in particular, characteristics of interest groups in the Eastern Caribbean. Case studies of large development projects in St. Lucia, St. Kitts, and Barbados are used to document and describe why attempts to protect limited natural resources have not worked.

The case studies describe the role of stakeholders in the public policy process: who is included and excluded from development decisions, who represents the stakeholders, their strategy of influence, and how their interests are in conflict. The report explains the way the method of decision making in these countries results in a closed public policy system, allowing national political leaders to control the public policy process, and preventing interested civil servants from implementing environmental policies. The growing influence of environmental interest groups in the countries is also described.

Recommendations are offered to improve the effectiveness of efforts to implement environmental policies. It is suggested that more effective linkages need to be created between donor agencies, national governments, and nongovernmental organizations (NGOs), as part of a multiyear program to increase institutional capacity for environmental planning, conflict resolution, and policy analysis. A method of conducting a stakeholder analysis is proposed that can be used to design practical strategies to implement new policies that accompany development projects. Legal protections need to be given to civil servants and local NGOs to enable them to participate more fully in the public policy process.

Recommendations also include how to strengthen ties between international and local NGOs and local resource users to increase interorganizational learning. It is suggested that donors and NGOs initiate a program to identify environmental leaders from developing countries who are familiar with local cultural and political conditions, helping them to form coalitions and devise linkages between economic development and environmental planning.

The research shows that in addition to interest group politics, three other factors need to be accounted for in any successful effort to implement environmental policies. These factors are the "culture of decision making," which is the interplay between local culture and politics that is integral to understanding how political decisions are made; a heavy reliance on short-term solutions for economic growth; and conflicting behavior within donor agencies. The current closed approach to environmental decision making is dysfunctional because it fails to address all of these factors.

Additional case study research is needed to examine these factors and to design a more open, functional approach to policy implementation that successfully protects limited natural resources. The case studies can then be used as the basis for a training curriculum to instruct participants from donor agencies, host countries, and NGOs in cooperative strategies to protect natural resources. In the meantime, a training program can be designed to train agency and country officials to understand the role of interest group politics in environmental policy implementation. This training should include strategies for implementing specific policies required by donor agencies and ways to enhance negotiation and mediation skills.

CHAPTER ONE

THE IMPORTANCE OF INTEREST GROUP POLITICS

Interest groups play an important role in the formation and implementation of public policies. They represent their constituents by forming a link between citizens and their government and different political factions within the political leadership. By studying how interest groups behave and relate to each other we can find out how they influence government and its policy-making process.¹

The emphasis on the importance of interest groups in policy making reflects the theory that society does not consist of a monolithic organization such as the state, but in Catlin's words is "an aggregate of individuals organized into various groups, sometimes contrary, sometimes mutually inclusive, sometimes overlapping."² The interest groups in developing countries, such as the island states of the Eastern Caribbean, often reflect the power of the individual who values political goods more than the health of the natural environment.³

The behavior of interest groups offers insight into the reasons why there is often a gap between the purpose and result of national policies. While policy making is often seen as a formal and predictable process, unintended consequences often result. By examining the interplay between interest groups, we can explore aspects of the policy-making process that may not be revealed by a standard policy analysis.⁴

In the context of the Eastern Caribbean, it is essential to examine how different interest groups interact with the political leadership and agencies of the government, as policy implementation depends largely on the politics within the executing agency.⁵ An analysis of the informal linkages between interest groups portrays the evolution and direction of policy change.

¹ Barry, 1984. Barry discusses the roles and functions of interest groups, including the roots of a group theory of politics. This work was based on experience in the United States but contains a good overview of interest group theory.

² Catlin, 1930 as discussed in Zeigler and Peak, 1972. The author describes interest groups as a political concept within the context of democratic societies.

³ See Catlin, *ibid.*, pp. 371-375, for a discussion of how the desire for personal power often influences the behavior of individuals involved in the policy-making process. Catlin describes the thirst for power as one where political goods are valued more than peace and order in society, a corollary to how the desire for power motivates politicians to make development decisions that damage the environment.

⁴ Ilchman and Uphoff, 1969. The field of political economy has been developed to examine aspects of the public policy process that are not clearly identified by standard analytic research methods.

⁵ Kahn, 1982.

CHARACTERISTICS OF INTEREST GROUPS IN THE EASTERN CARIBBEAN

Governments and public institutions in the Eastern Caribbean are small, as are the number of interest groups, so relatively few individuals exert great influence over the policy-making process. Interest groups themselves are usually small, with no more than a few members. Typically, a single official within a small agency, with close personal ties to a minister or senior civil servant, is the chief representative of an interest group.

The role of the individual within an interest group is magnified because of an emphasis on personalism and charisma in the region. The effect of personalism and charisma are amplified by the emphasis on informal relationships, oral traditions, and "man-to-man" politics that characterize decision making.⁶

The development of interest groups, and their relationship with governments, has not been static. As the economies and political systems of countries have matured, the strategy and influence of key interest groups have changed. Bureaucratic elitism and interest group manipulation, dominated by land owners, sugar producers, and general importers, have been augmented by formalized political parties, trade unions, and influential outside groups such as international foreign assistance agencies and multilateral development banks (MDB).⁷ With the increase in international development assistance in the region, the importance of outside interest groups, such as the MDBs, has grown.

Local interest groups influence political leaders and bureaucrats responsible for carrying out environmental policies. These groups include local land owners, the business community, industrial and trade associations, the tourist industry, and private investors. Some interest groups with a stake in implementing environmental policies are not as influential. These groups include environmental nongovernmental organizations (NGOs), educators, community groups, and resource users such as fishermen and farmers who depend on the health of the environment for their livelihood.

INTEREST GROUPS AND STAKEHOLDERS

There are some important distinctions between interest groups and stakeholders. Interest groups are existing organizations with an expressed interest in the outcome of a public policy decision. Stakeholders also have, as the name implies, a stake in the outcome of a government decision or policy, but may not be organized into a group.⁸ In many developing countries, stakeholders that have an interest

⁶ Ibid. Khan describes the importance of personal ties between elites and politicians and the importance of this within the informal decision-making mechanisms that influence public policy implementation (pp. 43-44, 76).

⁷ Ibid., p. 43.

⁸ Susskind and Cruikshank, 1987, pp. 11, 13, 25, 103-104, 239-240. The authors discuss how to identify stakeholders, the need to involve all stakeholders in the decision-making process, and how to include stakeholder attitudes and perceptions in negotiations and policy making.

in minimizing the adverse environmental effects of development decisions do not have a formal voice in the decision-making process. Stakeholders who have an interest in promoting effective environmental policies are generally newly organized and do not belong to existing interest groups.

By identifying and examining both interest groups and stakeholders, it becomes evident who is included and who is left out of key policy decisions that cause environmental destruction. The ability of different parties, whether they are organized into groups or not, to strengthen or weaken environmental policies is a result of their underlying interest, who represents them, and their strategy of influence. The issue of who has access to power and how they use it is also important.

Parties that have an interest in public policy decisions that affect the environment can be divided into two groups — those that are included in development decisions and those that have a stake but are left out. Parties that are typically included in development decisions include the political leadership, private investors and developers, local civil servants, labor unions, and selected members of the local business community.

PARTIES INCLUDED IN DEVELOPMENT DECISIONS

The Political Leadership

The national political leadership is headed by the Prime Minister, who is leader of the majority party and chairman of the Cabinet of Ministers. The Prime Minister also holds a major cabinet portfolio, usually doubling as Premier and Minister of Finance or Planning. The Prime Minister often exerts great personal influence in an informal manner through one-on-one conversations and public oratory, reinforced by charisma and the force of personality.

In recent years in the Eastern Caribbean, since many countries have gained national independence, political parties have become better organized. The emergence of community-based political parties, reinforced by patronage appointments of party members to top government jobs, creates an intense loyalty to the political leadership. The concentration of power among a few political leaders is further accentuated by their tendency to make decisions personally, without bringing outsiders into the policy making process. Outsiders can be senior civil servants, technical experts from foreign assistance agencies, or members of the public. The Prime Minister sits atop a network of influence, persuasion, pressure, and obligation, fueled by relative isolation that perpetuates particularistic role play and factionalism based on political ideology, party affiliation, and social class.⁹

The Prime Minister, the Cabinet, and top officials such as permanent secretaries have a primary interest in staying in power. They do this by promoting policies that increase economic growth, reduce unemployment, and preserve foreign exchange. The agenda of economic growth is often highlighted by large, highly visible development projects that are approved just before or after national elections.

⁹ Khan, *ibid.*, pp. 50, 51, 76. Khan also discusses the work of Simey, 1946, who cautions that management issues in the West Indies tend to become submerged in a welter of conflicting personalities. Also see Palmer, 1985. Palmer describes the role of charismatic politicians in political development, including how such leaders operate outside the boundaries of traditional authority.

In most of the countries of the Eastern Caribbean, virtually all decisions that affect natural resources are made directly by political leaders with little or no input from the public. The Cabinet or a single minister usually initiates and must approve all large development projects. The wide range of decisions made by political leaders is a sign of the ubiquitousness of government as the major stakeholder in these societies.

Private Investors and Developers

When development projects are proposed and funded by private investors, they usually approach the political leadership directly to "test the waters," instead of first applying for a development permit using formal planning procedures. In this way an informal project approval may be obtained from a member of the Cabinet, usually a minister with the portfolio similar to the project (for example, a resort developer will approach the Minister of Tourism), prior to submitting the project to the national planning authority.

When a project is formally submitted to the planning agency for its review, developers benefit from pressure exerted on civil servants by political leaders through party affiliation, patronage-dominated relations, subservient relations, and direct interference.¹⁰ Private investors and political leaders have complementary objectives — to bring in foreign exchange that promotes investment and economic growth.

Civil Servants

Civil servants involved in development decisions that affect natural resources work in a central planning unit, physical planning office, or in some specialized area of natural resource management (fisheries, forestry, agriculture, or water quality). An office within the central planning unit, usually either Town and Country Planning or the physical planning section, is the lead agency for evaluating development projects. To understand how civil servants influence the outcome of development projects, it is necessary to review how the planning process typically works.

When a proposed project is reviewed for conformity with planning laws and policies, the chief planner is responsible for consulting informally with technical experts in other agencies (fisheries, forestry, agriculture, water engineering, public works, transportation, or coastal management) to determine how a project will affect natural resources. The consultative process used for evaluating projects is informal, and the way that it is used depends on the discretion of the chief planning officer, who reports directly to a permanent secretary and a minister. When planning officials are pressured to approve projects that have received informal approval from ministers or the Cabinet, the input of natural resource managers is usually ignored.

This abuse of the consultative process usually results in developments that damage natural resources. For example, in the late 1980s, permission to build the Sierra Hotel on the south coast of Barbados was denied by all government agencies, including the office responsible for managing coastal

¹⁰ Khan, *ibid.* He discusses the dominant factors in the relationship between politicians and civil servants, which were confirmed by my field work. In all of the countries studied, it was found that civil servants working in planning agencies feel pressured to review and approve development proposals promptly, often ignoring time-consuming environmental requirements (B 2, 22, 30; SL 5).

resources. But the hotel was built because a key minister had a financial interest in the project (B 3). This project resulted in severe beach erosion that affected the new hotel and adjacent properties. Numerous interviews with local officials and subsequent field observations showed that it is not uncommon for projects to be approved in this ad hoc fashion in St. Kitts, St. Lucia, or Barbados.

The general interest of civil servants involved in natural resource management is to carry out government policies in a way that meets their professional standards and protects the resources. This is difficult for several reasons. Planning agencies operate under the same financial and technical constraints as other ministries, and, as a result, their staffs are routinely overworked. The planning authority only makes recommendations; its decisions are not binding, but are referred to the lead minister who reports to the Cabinet, which makes the final decision. By placing the responsibility for development decisions, including the enforcement of environmental protection standards, in the political directorate, authority is effectively removed from the civil service.

In addition, the way in which natural resource managers are spread among disparate ministries that have narrowly defined responsibilities for different sectors of public management prevents a coordinated approach to evaluating the environmental effects of development projects. Civil servants are in a double bind; they wish to use their technical training to integrate natural resource management with development planning, but find it politically infeasible to implement environmental policies because of their close personal ties and dependency upon the political leadership for jobs.¹¹

Unions and Trade Associations

Unions and trade associations are indirectly involved with the development approval process. In the past several years these groups have increased in size and solidified their place in Eastern Caribbean society. Due to the overwhelming need for foreign exchange and employment, these groups often publicly support large development projects.

A case in point is the National Workers Union in St. Lucia, which is the largest union in the country with 5,000 members. The union publicly supported construction of a large tourist resort in the proposed Pitons National Park, in the belief that it would generate local jobs and increase government support to rebuild the west road connecting Castries with Soufrière.¹² Unions and trade associations generally support the ruling political party in its effort to attract foreign investment. They utilize local media and regular meetings of their membership to support projects that provide jobs, which in turn weakens the authority of civil servants who lack the resources and jurisdiction to respond.¹³

¹¹ *Ibid.*, p. 76.

¹² The St. Lucian *Weekend Voice* newspaper, Saturday, May 13, 1989.

¹³ Forester, 1989. Forester discusses, in Chapter 3, how the exercise of private economic power combines with politics to counteract the implementation of plans. He describes how this contributes to the intensely political nature of the planning process.

Members of the Business Community

The members of this interest group are individuals and companies in the local business community who benefit directly from the economic benefits often credited to development projects. Their interest in a specific project is usually represented directly by themselves, as opposed to representation by a trade association or chamber of commerce. It is common for key members of the business community, who also belong to the ruling party, to be appointed to influential government advisory boards or commissions on which they can represent their own interests.

The business community promotes its influence through close ties to political leaders in a variety of ways. For example, politicians are depending more and more on their patrons in the business community to provide money and manpower in national election campaigns. It is also common for politicians, both elected and appointed, to own a local business, or have a financial interest in one. For example, a member of parliament may have a local business as a contractor, supplier, or attorney for a developer or investor. When such a politician meets with other political leaders to determine if a project should be approved, he represents his own business interests as well. This creates a pro-development liaison between political leaders and the business community that values economic development more than environmental protection, and places these individuals in conflict with parties often left out of the policy making process whose primary interest is the protection of natural resources.

PARTIES LEFT OUT OF DEVELOPMENT DECISIONS

Stakeholders that are left out of the policy-making process when development decisions are made often lack direct and personal access to the political leadership. Many of these stakeholders are unorganized and have no formal representation. This includes local resource users such as farmers, fishermen, and small landowners. If these parties are organized, such as a farming or fishing cooperative, they usually are hesitant to become advocates in the policy-making process, as this behavior will place them in competition with established political leaders.

Other stakeholders that are usually excluded from policy making include those that have recently organized and have not been in existence long enough to build the personal relationships with political leaders needed to affect the policy dialogue. These groups can include environmental groups, regional universities, and research centers, based in the country, region, or abroad.

Stakeholders that are unorganized or that have recently formed, such as environmental groups, need to increase their political power to obtain a stronger bargaining position when negotiating with political leaders.¹⁴ Governments in the region have not agreed to share authority with most stakeholders, so they have little influence in the public policy process.

¹⁴ Bartelmus, 1986. The author describes the major stages in the national planning process and how the potential for ecologically sound development is affected at each stage. He cites a report prepared in 1976 by the United Nations Environment Program, titled "Ecodevelopment," which recommends that "the style and rate of development . . . be determined by those people most affected." However, this recommendation did not account for the political realities of existing power structures and the difficulty of gaining access to them.

The Public, Including Resource Users and Beneficiaries of Development

Individual ministers and the cabinet control the development review process, so there is no opportunity for members of the public to take part in development decisions. Formal public meetings to obtain the feedback of local citizens are not held.

If the political leadership decided to sponsor public hearings, it is uncertain what effect it would have, given a cultural predisposition against community participation, a perception of powerlessness, a sense of self-doubt, and the acceptance of dependency.¹⁵ However, the lack of public participation means that resource users (such as farmers, fishermen, and charcoal producers) who have special knowledge of local environmental conditions are not consulted during the development review process. Local knowledge of the natural environment is hard to find, given the general rejection of land-based manual labor due to its association with slavery. This condition, combined with illiteracy among rural dwellers who tend to be the resource users, means that it would take a concerted effort to tap the knowledge of these individuals. Members of the public who may have an interest in preserving environmental quality are few in number, unorganized, and not consulted.

Local Environmental Groups

Environmental stakeholders are a disparate group, and include individuals who are experts in natural resource management, historians, anthropologists, architectural preservationists, and naturalists. These parties are often organized into small NGOs by one or two key individuals motivated originally to carry out a specific task, such as the preservation of a particular area, building, or wildlife species.

Pro-environmental groups and individuals have a limited capacity to affect public policy decisions for several reasons. These groups are small in size and lack the staff that would enable them to work on more than a few small projects at once. Most are self-supporting and must find a way to support themselves financially, as few organizations have the official support of national governments. Exceptions to this are the National Trusts in St. Lucia and Barbados, which are officially recognized by their governments. However, organizations such as these must be careful not to alienate political leaders by taking sides in environmental disputes or they can be branded as antigovernment or as being aligned with the opposition party. To keep government sponsorship, these quasi-governmental organizations have to remain politically neutral, so they are not able to serve as advocates for the environment in most disputes.

Most environmental groups have been formed in the last few years. They lack the public base of support needed to be effective political organizations, and find it very hard to increase their constituencies. This is due to the public's lack of awareness of environmental concerns, and a perception that environmental protection results in lost economic opportunities. In addition, governments are often skeptical or suspicious about the role of NGOs in general.¹⁶

¹⁵ Mills, 1966. Also see Jones, 1976.

¹⁶ See Island Resources Foundation, 1987. This report lists all of the NGOs in the region in each country that have or could have an interest in promoting environmental protection, and discusses the limitations NGOs face when trying to affect national public policies.

Environmental stakeholders are motivated by a personal environmental ethic, which is difficult to translate into the economic terms that politicians understand.¹⁷ This dilemma will require local NGOs to develop new strategies if they are to make any substantial contribution to protecting the natural resources in the countries of the Eastern Caribbean.

Nongovernmental Organizations

This group of stakeholders includes environmental foundations in the region and the United States, educational institutions, and small research agencies specializing in natural resource management. The following descriptions are not meant to be exhaustive, but are included to give an idea of the organizations that are involved in the Eastern Caribbean.

The Centre for Environmental Studies and Natural Resource Management (CERMES) at the University of the West Indies, Barbados, trains students in a new degree program. Several of the students are now employed by governments in the region. The Caribbean Conservation Association (CCA) is the oldest environmental NGO in the region, and is located in Barbados. Seventeen countries belong to the CCA. It sponsors conferences, coordinates training, advises governments, and conducts environmental education programs. The Caribbean Natural Resources Institute (CANRI), formerly the Eastern Caribbean Natural Area Management Program, has offices in St. Lucia and the U.S. Virgin Islands. It coordinates several natural resource management projects in the region, and is helping several countries increase their institutional capacity. The Island Resources Foundation, in the U.S. Virgin Islands and Washington, D.C., also works with several countries. It provides technical environmental services, works with the U.S. Agency for International Development (USAID) to prepare national environmental profiles for several countries, has a new program to organize small NGOs throughout the region, and has published many papers on a wide variety of environmental topics.

These organizations are making a valuable contribution to natural resource management in the region by training technicians, developing programs to improve environmental management, and performing field research. However, because governments in the region do not have formal mechanisms to allow these stakeholders to participate in the policy-making process, they generally do not become directly involved in development decisions. Two other factors influence the involvement of NGOs in the political process. Regional organizations, such as CCA, cannot become directly involved in local politics out of fear that they will alienate their members in government. It is politically more acceptable to serve a regional coordinating role, and this helps assure a longer life for the organization. In addition, regional organizations lack the credibility within each country to work effectively on local environmental issues. Organizations have to have a local institutional presence on an island to have legitimacy, and to know enough about the political system and culture to be effective.

An additional factor preventing these organizations from being effective is the prevailing view among political leaders in the region that environmental concerns are obstacles to development. If these groups take a pro-environment stand on a given project that political leaders deem too strong, they will lose their access to government, rendering them ineffective in the future. However, these organizations are helping the region to slowly form an environmental tradition.

¹⁷ Weber, 1958, pp. 77-128. Weber talks about the "flame of pure intentions" and the "ethic of responsibility" in relation to political decision making.

CHAPTER TWO

CASE STUDIES FROM THE EASTERN CARIBBEAN

ST. KITTS

National environmental legislation in St. Kitts includes laws to control the use of land, forests, water, beaches, wildlife, and public areas. In most instances, no regulations have been created to implement legislation and, if regulations do exist, they are usually not enforced.

The Town and Country Planning Ordinance was passed in 1949 but has no regulations to implement it. The Land Development (Control) Ordinance, passed in 1966, requires that development plans be approved by the Minister of Development, but there are no regulations to accompany it.¹ As a result, there are no controls over new developments being built on steep hillsides, on fragile soils, or in areas with flooding problems from intense seasonal rainfall.

A Forestry Ordinance was adopted in 1904 with the Chief Agricultural Officer in charge of regulations intended to control clearing, burning, and charcoal production. This legislation does not include provisions to establish and manage forest reserves. Field surveys in 1989 showed that this law remains largely unenforced. The result is clearing and burning of forest areas that contribute to erosion and siltation of downstream water catchment areas.

The Pesticides Act of 1973 does not have any regulations to implement it, and pesticide misuse and contamination of neighboring lands are growing problems. The Pesticides Board accompanying the Act has apparently stopped functioning.² Sand mining on beaches is supposed to be regulated by the Beach Control Ordinance. To stop illegal sand mining, which provides beach sand at low cost to make the foundations for new buildings, a quarry was opened up near the Canada Estate in the mid-1980s to protect the nearby beach. However, mining of the beach has continued, degrading the adjacent mangrove habitat in Greatheeds Pond and destabilizing the coastal sand dune system.

Fish that are caught and marketed by local fishermen are a major source of protein for the people of St. Kitts. The Fisheries Act of 1984 allows for the regulation of shellfish such as lobster and conch that are heavily fished and exported to earn foreign exchange. However, both fisheries remain largely unregulated, resulting in a severe decline of the local fishery (SK 13). The Watercourses and Waterworks Act adopted in 1973 established a Water Board to manage fresh water resources. Its responsibility includes pollution abatement. A field survey of the many drainage channels on the island, including a river that drains into the main beach in the capital of Basseterre, shows that water pollution is evident in every settled area.

¹ Information about the history and status of older laws relating to different aspects of natural resource management is contained in Organization of Eastern Caribbean States, 1986a.

² Ibid.

The existence of these environmental problems was confirmed during a workshop with civil servants responsible for resource management in St. Kitts in 1987. During the workshop, documented problems included the improper dumping of industrial waste in the main harbor in Basseterre, unregulated dumping of garbage in watercourses, uncontrolled construction in coastal areas, destruction of coral reefs, coastal erosion, the failure of beach protection projects, and the removal of mangroves because of sand mining.³

In 1985 the parliament passed legislation establishing an Environmental Department with a wide range of duties, including taking over all functions related to environmental management from the Physical Planning Section (PPS) of the Central Planning Unit.⁴ The department has not been funded and has no staff. The responsibility for environmental concerns is scattered among various ministries, so that no one office is accountable for them.

After the 1989 national election, the Cabinet eliminated the ministerial portfolio for the environment, which had been held by the Premier of Nevis, the sister island of St. Kitts. This action reflected the low priority given to environmental protection by the national political leadership. The failure of the government of St. Kitts to enforce its own environmental legislation was an indication of what would happen when the government decided to develop intensively the island's southeast peninsula.

USAID and the Southeast Peninsula Development Project

In early 1984 representatives of the government of St. Kitts asked USAID to provide financial and technical assistance to develop the island's southeast peninsula as a major tourist destination. The project elements include a 6.4-mile road to provide access to the peninsula, in addition to public utilities (water, power, and communication) to serve future tourist developments including hotels, condominiums, houses, shops, duty-free concessions, marinas, and a possible cruise ship port. Construction of the road has been funded by USAID. The USAID loan agreement includes a grant for \$1.14M and a loan of \$11.40M, with St. Kitts contributing \$4.1M for a total package of \$16.64M.

The project has been closely tied to the National Development Plan for St. Kitts. The Five Year Plan for 1986-1990 emphasizes the development of the tourism sector to lead national economic growth. The general objectives of increased tourism include generating foreign exchange earnings, providing jobs, and a secondary boost to local manufacturing and agriculture. The plan contains specific objectives, including 800 new hotel rooms, the doubling of tourists from 50,000 to 104,000 annually, and an increase in tourist revenue from \$20M to \$50M.⁵

³ The proceedings of the workshop are summarized in Gamman, 1987.

⁴ Soler, 1988a. Soler's report summarizes the administrative structure of the physical planning process in St. Kitts and problems that it has encountered due to the lack of a clear mandate from the political leadership. It also predicts how these problems will be increased with the added responsibility of the Southeast Peninsula Development Project.

⁵ National Development Planning of St. Kitts and Nevis: 1986-1990.

Prior to the peninsula project, the government had no organized national growth strategy. The Five Year Plan was coordinated with the project, as evidenced by a 1985 study on tourism prepared for USAID, which concludes that "the maximum value of the peninsula lies in its ability to broaden the island of St. Kitts as a tourist destination" as it will increase tourist visits, add investor interests in providing a tourist infrastructure, and improve foreign exchange earnings.⁶

Since USAID first became involved with the southeast peninsula project in St. Kitts, one of its stated goals has been to carry out the mandate of the U.S. Congress to preserve the island's natural resources. But the efforts of USAID to protect the environment of the peninsula have not been entirely successful.

The 4,000-acre peninsula is considered to be one of the best examples of a native wildlife area in the Eastern Caribbean because it has been relatively undisturbed. Among its abundant natural resources are coral reefs, salt ponds, sea grass beds, mangroves, and wetlands, which include several species in danger of extinction.⁷ Natural resources that are particularly limited or sensitive have been included in proposed parks and protected areas, as part of the planning for the project. Proposed protected areas and their associated natural resources include marine reserves at South Friars Bay (conch), Majors Bay (lobster), Guana Point (coral), and wildlife reserves at Nags Head (birds), and North Canoe Bay (endangered sea turtles). Seventeen sites have been classified as "Landscape and Conservation Management" areas, to protect sand dunes, ponds, steep slopes, peaks, scenic vistas, forested areas, wildlife habitats, and beaches. Eleven areas have been identified as Historic and Archaeologic sites.⁸ The fragility of these resources makes them particularly vulnerable. They could easily be destroyed given the lack of a strong national policy to protect them.

Officials within USAID's Regional Development Office in the Caribbean (RDO/C) expressed their concern about the peninsula's natural environment as early as mid-1985: "RDO/C considers the adoption of a land use and environmental policy as essential to guiding the development of the peninsula along an appropriate path."⁹ Also, USAID's Congressional mandate requires the mission to assess the potential adverse environmental effects of its projects by preparing Environmental Impact Assessments to mitigate damage to natural resources. The stated purpose of this procedure is to "permit consideration of alternatives and mitigating features in project design."¹⁰

⁶ Beekhuis, 1985. Current economic indicators in St. Kitts include a current account deficit, an external debt of \$40M and persistent high unemployment, although unemployment has dropped with the construction of the peninsula road. The national economy is largely dependent on sugar exports; hence the emphasis on strengthening the tourist sector (1986 World Bank *Economic Report*).

⁷ Norton, 1988. Norton gives a full description of natural resources on the peninsula, and recommends management alternatives to assist preservation efforts as the peninsula develops.

⁸ Island Resources Foundation, 1986.

⁹ Regional Development Office/Caribbean (RDO/C), 1985. The CDSS outlined USAID's strategy for developing the project. It was intended as a way to diversify the economy by expanding it into non-sugar agriculture, tourism and light manufacturing.

¹⁰ USAID, 1988. The U.S. Congress amended the Foreign Assistance Act in 1981 to require that USAID prepare environmental impact assessments.

In early 1986, an independent consultant completed the Environmental Assessment of the peninsula project. Several possible environmental impacts were identified, including coastal erosion, damage to reefs, wetlands and mangroves, degradation of the marine ecosystem, destruction of wildlife habitat, and disposal of dredge materials. The report contained several recommendations intended to mitigate this environmental damage, including the establishment of special conservation zones, formation of a new Environmental Unit within the government to improve its capability to address environmental problems, and preparation of building guidelines and a Land Use Management Plan.¹¹

In July 1986, the Land Use Management Plan was published. It also contained several recommendations to protect the natural resources on the peninsula. Key recommendations included (1) adopting legislation to establish an advisory board to oversee planning and environmental aspects of the project; (2) adopting laws for beach control, marine pollution, fisheries management, and parks and protected areas; and (3) establishment of an Environmental Unit within the Planning Unit. Most importantly, the report stated: "Prior to commencement of Southeast Peninsula construction projects, Government needs to provide the necessary legal and administrative framework within which an orderly but creative process of development can take place without causing environmental damage."¹²

In September 1986, the Project Grant and Loan Agreement financing the project was signed by St. Kitts and USAID. In November, parliament approved the Southeast Peninsula Development and Conservation Act establishing a five-member advisory board. The board is appointed by the Minister of Development, and is responsible to review development proposals and conservation guidelines for the peninsula. In response to pressure from USAID, parliament then passed the National Conservation and Environment Protection Act (NCEPA) in April 1987 (SK 12). Major elements of the act included a comprehensive law to replace environmental statutes that were outdated and unclear, and establishment of a National Conservation Commission to implement the law.

Over the next two years, consultants prepared several reports documenting the natural resources on the peninsula, and recommending how the government should preserve them. The road penetrating the peninsula, the largest part of the project, was completed in early 1990. But at the time the road was completed, the government had still not taken several measures to increase its institutional capacity for environmental planning.

By mid-1990, the advisory board was functioning, reviewing development proposals that included 140- and 400-acre residential projects, and a 250-room hotel. Yet, the Conservation Commission still was not appointed, despite repeated assurances from the Attorney General that its appointment was imminent (SK 12, 17, 21; Soler, 1988). The chairman designee of the commission resigned, after saying that the government was not interested in incorporating conservation into the peninsula developments (SK 8). The National Conservation and Environment Protection Act was not implemented, the Environmental Unit still did not exist, and laws for beach control, marine pollution, fisheries, parks and protected areas remained unenforced. The outlook for the natural resources on the peninsula, despite a long and involved program to increase the environmental accountability of the government, was not good.

¹¹ Island Resources Foundation, 1986, *ibid.*

¹² *Ibid.*, page 5 of the Executive Summary.

ST. LUCIA

In St. Lucia, legislation exists to regulate several aspects of natural resource management, but it is only partially enforced. This has resulted in environmentally destructive land use practices and pollution problems that degrade the island ecosystem. The Forest, Soil, and Water Conservation Ordinance, originally adopted in 1946 and amended in 1983, is intended to regulate forestry activities, promote conservation, and establish forest reserves.¹³ The law is accompanied by enforcement powers including fines and criminal prosecution. However, it is estimated that only 10.8 percent of the forested areas on the island are protected. This has led to deforestation on steep slopes cleared for agricultural production, causing erosion and sedimentation problems.¹⁴ A field survey in 1989 showed that forest lands are being cleared for agriculture, grazing, and charcoal production in many parts of the island.

The Water and Sewage Authority Act established an enforcement mechanism to regulate water pollution, but raw sewage is discharged directly into the main harbor in Castries posing a health hazard. Similarly, the Pesticide Control Act adopted in 1975 established a board empowered with enforcement capabilities, but no regulations have been enacted to control pesticide use.¹⁵ This lack of enforcement has allowed water supplies to be contaminated by toxic chemicals used for agricultural production.

In addition to these regulatory problems, the political leaders of St. Lucia have forestalled several efforts by civil servants to create a comprehensive national policy for the environment. In 1982 a National Environmental Commission was proposed by the Chief Forestry Officer (CFO). The purpose of the commission was to establish a government agency to eliminate overlap and gaps in the jurisdiction of natural resources, and to form a national consensus on the environment. All of the major interest groups from both the public and private sectors were to be represented on the commission. However, the Prime Minister felt that the commission would delay development projects so it was never given its official Terms of Reference by the government (SL 6). As a result, there is no organization within the government to coordinate the resolution of environmental problems. The failure of the national planning authority to perform long-term planning, due to a refusal by the Cabinet to authorize the required legislation, has contributed to this problem.¹⁶

¹³ For a description of all of the environmental legislation in St. Lucia, refer to the Organization of Eastern Caribbean States, 1986b.

¹⁴ Taken from *Short Run Gain - Long Term Pain*, a Report of an Environmental Retreat held for Community Leaders at the Pastoral Center, Marisule, October 14-15, 1987. This report discusses several types of environmental problems in St. Lucia and recommends ways to help resolve them.

¹⁵ Organization of Eastern Caribbean States, 1986b, *ibid*.

¹⁶ Soler, 1988b. This report outlines the administrative framework of the national planning process and makes several recommendations about how to improve it.

The Pitons Controversy: A National Park or a Resort?

The Pitons controversy involves two competing proposals to develop the same site in the Piton mountains. The resort project is sponsored by private international investors proposing to develop a large tourist resort on the Jalousie Estate, a 316-acre parcel in the saddle between the Gros and Petit Pitons, two forested peaks on the Caribbean Sea that are the national symbols of St. Lucia. A proposal for a Pitons National Park, sponsored by the Organization of American States (OAS), would use the estate to house the park headquarters. Both projects have involved attempts to implement environmental policies to protect natural resources.

The tourist resort, sponsored by the Swiss-based M-Group, involves a \$25M private investment to build 120 cottages and suites, sporting facilities, a health spa, and docking facilities for yachts.¹⁷ When the Cabinet granted the developer an Alien Landholding License for the site it also granted financial incentives (duty-free import of construction materials and goods for the hotel, a multiyear tax holiday, and expatriation of profits), and agreed to build the access road to the Estate at government expense.

The second project is the establishment of a Pitons National Park, proposed by the OAS. The proposal for the national park includes a park headquarters and visitor facilities on the Jalousie Estate, surrounded by a 25-acre botanical garden, a spice and fruit tree plantation, a reserve for the protected St. Lucia parrot, a mini-zoo, a small jetty on the beach to service small boats and water taxis, a combination bar/restaurant, museum, and picnic, camping, and hiking areas. The park would serve as a field laboratory for research activities by educational and scientific organizations and the natural sciences. A funding source for the initial \$1.63M needed for land acquisition, roads, and buildings was not included in the park proposal.¹⁸

The natural resources at stake in the Pitons include the beach, prime near-offshore fishing grounds, open space uses on the estate, the vegetation and wildlife within the relatively intact mountain ecosystem, and natural hot springs and mineral baths. The proposed park also includes important cultural and archaeological resources from past human settlements in the area.

¹⁷ The *Voice* newspaper of February 18, 1989, summarizes the elements of the proposed resort. Official information from the government about what the project includes has not been available. Several local newspaper stories have been pieced together to help understand key elements of the case.

¹⁸ Organization of American States, 1989. The St. Lucian government, through the Soufrière Development Program, requested technical assistance from the OAS in 1985. This report summarizes the results of the planning process for the proposed national park, and includes economic conditions, natural and cultural resources, how the project would be executed, and an assessment of its financial benefits. The OAS plan is accompanied by a Master Plan for the redevelopment of Soufrière, prepared by the Soufrière Development Program. It includes a resort hotel closer to Soufrière as an alternate the Jalousie project, a waterfront market mall, restaurants, hotels, commercial facilities, condominiums, a spa, and anchoring area for large cruise ships.

Both of the projects are consistent with a national policy to diversify the agriculturally based economy by promoting tourism.¹⁹ The St. Lucia National Plan calls for developing the island as a tourist destination through improved marketing and airline services, provide foreign exchange, stabilize employment, and benefit local businesses that provide supplies to hotels and resorts. The plan also promotes "harmonization of the growth of tourism with regional development thrusts," which is compatible with the regional growth strategy in the national park proposal. The plan, and statements by the Prime Minister, reflect a target of 3,000 new hotel rooms in the country by the year 2000. There are currently about 2,000 hotel rooms.²⁰

The proposal to develop privately the Jalousie Estate started in 1981 when the Cabinet issued an Alien Landholding License to Sir Colin Tennant. This decision also started the Pitons controversy, because when the Cabinet issued the license, it reversed its own earlier decision to acquire the site as part of a Pitons National Park. Tennant never built a resort on the site, and in 1988 sold it to the Swiss-based M-Group Resorts, which then received a new license from the Cabinet. The Development Control Authority (DCA) gave the new developer an Approval in Concept for a tourist resort on the Estate shortly after they purchased it.

After it gave conceptual approval for the resort, the DCA required that the developer provide an Environmental Impact Assessment ostensibly to protect the natural resources of the estate. However, the scope of the assessment was limited to site planning concerns, and did not include an evaluation of whether or not the Jalousie Estate was an appropriate site for the resort. The assessment was written by a consultant hired by the developer. It was rejected by the DCA as being biased in support of the project. A second assessment was then prepared by a new consultant hired with the assistance of the United Nations Development Programme (SL 5). This assessment was accepted by the DCA as adequately addressing a limited range of site planning concerns.

When the Cabinet issued the second Alien Landholding License in 1988 to the M-Group Resorts, it also granted the financial concessions noted above and agreed to build a major access road. These decisions by the Cabinet placed immense pressure on planning officials to approve the project, even though the environmental assessment process was not finished. In the words of an official familiar with the project; "The development permit itself is not before the Cabinet, but Cabinet makes its wishes well

¹⁹ Current economic indicators in St. Lucia include an annual growth rate of 1-5 percent, 20-25 percent unemployment, and heavy dependence on imports of manufactured goods, food, machinery, fuels, and chemicals, which are not produced in the country. A \$34M national debt also requires an accumulation of foreign exchange, placing additional importance on the growth of the tourism sector.

²⁰ Government of St. Lucia, 1980 (?). *St. Lucia National Plan: Development Strategy*. The Plan promotes the development of tourism, but also notes that it can disrupt "the socio-economic balance, aggravated by the fact that the sector is extremely susceptible to external influence at times of international boom and recession." The Plan also states: "a more specific social problem requiring close monitoring concerns local participation and interaction of tourists and residents." On April 11, 1989, the Prime Minister addressed Parliament regarding the Pitons controversy. He indicated his commitment to developing the resort facility while supporting the Park proposal. It is important to note the public position taken on this controversy by the Prime Minister. As the top political official and Leader of the Majority Party, a public pronouncement is at least as important as objectives contained in the National Plan.

known with its tacit support, so the choice to not develop the site is no longer feasible for DCA technicians" (SL 5).

When the government granted the Approval in Concept for the resort, plans for the project were not available to the public. The approval was granted without a public hearing, preventing environmental groups or concerned citizens from voicing their concerns. Before the DCA finished reviewing the second environmental assessment, and before it had issued any permits allowing the site to be developed, the developer posted "No Trespassing" signs on the beach and main road, preempting the long standing public use of the site for fishing, boating, and picnicking. The developer then brought a bulldozer to the beach, proceeded to grade it, and started construction of a jetty as part of a marina to serve resort guests. Meanwhile, the government started to build the access road it had promised the developer, also without the required permits.

At about same time, in early 1989, the Department of Regional Development of the OAS was submitting a formal proposal to the government for the Pitons National Park. The proposal stated: "The proposed development of a large private hotel on the Jalousie Estate is incompatible with the overall concept of the Pitons National Park and could also hamper the conservation or preservation of the unique cultural and natural attractions of the area."²¹

A group of businessmen from the nearby town of Soufrière who had formed the Soufrière Development Committee (SDC) had asked the OAS to prepare the proposal. The main objective of the national park was to provide economic opportunities for this remote part of the island that were compatible with the natural environment. The vision of park planners was to initiate a growth strategy that was environmentally sustainable.

When the park proposal was given to the government, it was not released to the public. The government did not adopt the proposal. In mid-1990, the government reportedly gave the developer permission to build the resort. A second large tourist project, the La Gros Piton Resort Village and Aerial Tramway was proposed in mid-1990, carrying 250,000 tourists a year to an 11-acre resort built on the top of the Gros Piton.²² This proposal caused renewed opposition to development in the area, spearheaded by a group of St. Lucians based in Barbados called the St. Lucia Environment and Development Awareness Council (SLEDAC). The park proposal has been recast as the Soufrière National Park project, which would protect several properties in the Pitons area, in concert with the World Heritage Convention. The St. Lucia National Trust is sponsoring this new park proposal. It appears that the Jalousie site will be developed as a private resort (SL 22).

²¹ Organization of American States, 1989, *ibid.*

²² Bousquet, 1990.

BARBADOS

Like St. Kitts and St. Lucia, Barbados has many laws intended to protect the environment, but they are not enforced. The Beaches Protection Act of 1890 prohibits removal of sand from the foreshore, while the Fisheries Regulation of 1904 is supposed to regulate the harvesting of sea turtles and sea eggs.²³ Yet, the beaches of the south coast were heavily mined to supply construction materials during the building boom of the 1970s, and remain unstable, while sea eggs and sea turtles are becoming scarce due to overexploitation and habitat destruction (B 16).

Legislation exists to establish marine reserves, but coral reefs are harvested to sell souvenirs to tourists, damaged by boat anchors, and degraded by raw sewage and agricultural runoff.²⁴ The Tree Preservation Act was passed in 1981 but lacks an enforcement mechanism, so trees continue to be illegally harvested, causing deforestation, erosion, and sedimentation that damages water catchment areas.

The Coastal Conservation Project Unit has recommended that a comprehensive Coastal Zone Management Act be passed but the government has taken no action. Government officials have publicly stated that competing uses are depleting limited natural resources, such as reefs and beaches.²⁵ The political leadership replaced the Ministry of Tourism and the Environment with the Ministry of Sport and Tourism in 1987. This action dropped the environment to a sub-Cabinet position in the government, reflecting a deemphasis of the environment by the political leadership.

The Bridgetown Fisheries Harbor

In 1982, the government of Barbados asked the Inter-American Development Bank (IDB) to provide the financial and technical assistance needed to build a large fisheries harbor in the capitol of Bridgetown. Between 1982-1984, the IDB undertook several steps to evaluate the feasibility of the project, including a Country Programming Paper, and orientation and analysis missions for its Washington, D.C. staff that resulted in a Project Report. A Loan Proposal was then prepared and submitted to the Bank's Board of Directors as the last step prior to executing a Project Agreement. The Barbados government and the bank signed the Project Agreement in late 1984.

The harbor is a large project, especially by island standards. It includes slips for 150 boats, a boat repair facility, an ice plant and fish processing facilities, a vending area, rum shop, and fuel docks. To build the harbor required massive cutting and filling of coastal land, and construction of a large

²³ See Atherley, 1987. Sea eggs are taken from sea urchins and are a delicacy in the West Indies.

²⁴ Hunte, 1989. Dr. Hunte is Director of the Bellairs Research Institute in Barbados. This paper summarizes several environmental problems related to the coastal zone and marine environment that exist in Barbados and throughout the region.

²⁵ Nurse, 1988. Dr. Nurse is Project Manager of the Coastal Conservation Project Unit.

breakwater to guard against storm surges. The jetty and harbor are next to the Constitution River, which houses several boats and drains a large part of urban Bridgetown.²⁶

The Fisheries Harbor was financed with a \$12.3M funding package from the IDB. The Project Agreement also included technical components to strengthen the institutional capacity of the National Fisheries Division to improve fishing gear technology, processing, and marketing operations. These programs are underway and end in mid-1990 (B 17, 31, 42). The Fisheries Harbor Project is consistent with national planning objectives contained in the Barbados Development Plan, 1983-1988. The plan states: "The main factors which have tended to inhibit the growth of the [fishing] industry are inefficient marketing and distribution systems and inadequate facilities for servicing and shelter." The plan also contains policies to improve marketing, upgrade the local fleet, and increase the efficiency of fishing operations, so that the industry meets 75 percent of local protein. Several specific projects are outlined in the plan, including construction of a large fisheries harbor in Bridgetown.

The natural resources at stake with the development of the Bridgetown Fisheries Harbor include both terrestrial and marine resources, local and regional fisheries, the stability of the interface between the near-offshore marine environment and a major river basin, and overall local water quality. While evaluating the feasibility of the harbor, the bank did not examine its potential adverse impact on the natural environment. Possible environmental impacts included depletion of local and regional fish stocks, sedimentation of the harbor mouth and the adjacent river mouth, and degraded water quality in the harbor due to improper waste disposal from live-aboard fishermen.

One of the major objectives of the project was to increase the production of the fishing industry. Technical experts from the bank assumed that the population of flying fish, the mainstay of the Barbadian fishing industry, was sufficient to sustain the increased fishing pressure the harbor would create (B 34, 43, 17, 42),²⁷ but this judgement was made without any scientific evidence about the status of the fishery. In addition, when the government decided to redesign the harbor and extend the large breakwater in 1986, the bank had the opportunity to assess the effects of the project on coastal resources, but decided to proceed without doing so (B 17, 31).

Several reasons have been given by IDB officials to explain why the environmental impact of the fisheries harbor was not integrated into the evaluation, design, or construction of the harbor. One official said that the project simply "pre-dated the environmental period of the Bank" (B 34). Other officials explained that the bank focuses on analyzing projects, not implementing environmental

²⁶ It is important to consider the fisheries harbor project in the context of the island economy. The national economy is largely dependent upon sugar, which accounts for over 50 percent of its export revenue. Efforts are underway to strengthen the economy by diversifying the agricultural base and providing new facilities for tourism. Economic problems have increased in the 1980s, as indicated by an external debt of \$40M, a 20-percent rate of unemployment, and a current account deficit. Domestic savings have declined continuously since 1978, adding to fiscal difficulties caused by the deteriorating financial performance of the sugar industry.

²⁷ In 1982 the United Nations Food and Agricultural Organization issued the *Report of the Barbados Fisheries Development Project*, sponsored by the FAO Investment Center. The report included a "quick and dirty" estimate of the sustained yield of the Barbados fishery. It estimated that an annual yield of 20,000 tons can be sustained. This is more than three times the peak fish catch, which occurred in 1983. There was no scientific evidence to support the estimate (B 24).

safeguards, as few bank staff in the regional offices are trained in environmental management (B 35, 42).²⁸

²⁸ The case presented above analyzes the status of the IDB's environmental policies as of early 1989. Since then the bank has made substantial progress in strengthening its capacity to include environmental factors in projects. In early 1990, the bank formed an Environmental Protection Division, staffed by experts in various aspects of natural resource management. One of its first tasks was to develop procedures for classifying and evaluating the environmental impacts of projects. The division is continuing to create new procedures for dealing with the environmental and social impacts of bank projects — a significant improvement from the period when the Bridgetown Fisheries Harbor was built. At that time the bank lacked any procedures to integrate natural resource management into its development process. However, as is the case with all donor agency environmental policies, there remains a gap between policy and practice. Problems with implementing measures to protect natural resources in the field still persist, and additional staffing and political will are required to overcome these problems.

CHAPTER THREE

LESSONS FROM THE CASES

The evidence shows that one reason why environmentally destructive decisions take place in the Eastern Caribbean is because key stakeholders are excluded from the policy-making process. In addition, these decisions can best be explained by examining the relationship between interest groups that are included in policy making, and their relationship with political leaders.

HOW POLITICAL LEADERS CONTROL THE PUBLIC POLICY PROCESS

In all three countries, the political leadership represented pro-development interest groups to support development projects that had environmental problems. In each case, the developers used a different strategy of influence. Certain stakeholders were included in the policy-making process while others were excluded.

St. Kitts

In St. Kitts a small group of political leaders, with the advice of influential members of their political party, possess the power to make public policy decisions that affect the environment. Throughout the decision-making process for the Southeast Peninsula Development Project, the same few people have represented the government.

The primary representatives of two main interest groups, the national political leadership and landowners on the peninsula, have been the Prime Minister, the Minister of Development, and the Attorney General. The Minister of Development and the Attorney General have represented the government in its negotiations with USAID over the past several years. In turn, the Minister of Development has represented peninsula landowners in these negotiations (SK 12).¹

The control that the Minister of Development exerts over the development process in St. Kitts, and the way the implementation of environmental policies is discouraged, can be seen by examining his role in the government. His ministerial portfolio includes Agriculture, Lands, and Housing, in addition to Development. His responsibilities include overseeing the Central Planning Unit which reviews development applications for the country. His multiple portfolio makes him responsible for the enforcement of most environmental laws. He controls the Southeast Peninsula Land Development and Conservation Board, an advisory body coordinating all development activities on the peninsula. By

¹ When the Southeast Peninsula Development Project was initiated in the early 1980s, its 4,000 acres were divided into 22 parcels owned by about 30 private parties. The peninsula was the only part of St. Kitts left in private ownership after the government formed the National Sugar Corporation in 1975 and nationalized all of the sugar plantations in the country. No working plantations existed on the peninsula at the time.

holding these positions of authority, the minister is the major force in forming national policies that determine how decisions are made that favor development or the environment. The way that the minister is choosing to favor pro-development interests can be seen by examining some of his actions.

The minister appointed five members to the Southeast Peninsula advisory board. The board is responsible for making recommendations to the minister to provide for the development, conservation and management of the peninsula.² The minister takes recommendations from the board to the Cabinet, which makes all final decisions. These decisions are then ratified by the House of Assembly.

However, the individuals appointed by the minister represent only development interests. No member of the board has background or expertise in natural resource management or conservation. Board members include the Permanent Secretary of Tourism, a senator who also is a private electrical contractor, a landowner/hotelier, a private engineer, and the public works engineer. The hotelier is a major landowner on the peninsula and is a founder of the Peoples Action Movement party, the majority party in the country. He is a member of the government's inner circle and wields much political influence (SK 8, 14, 17). He represents the interests of large landowners and the tourist industry, and supports intensive development of the peninsula, including projects he is sponsoring (SK 25). He perceives the role of the board as a "coordinator for developers" (SK 18). This is in contrast with the legal mandate for the board, which is to evaluate development proposals, control pollution, preserve environmental quality, and implement environmental protection plans.³

USAID required that St. Kitts pass new comprehensive environmental legislation (the National Conservation and Environment Protection Act) and establish a National Conservation Commission to oversee environmental management on St. Kitts and Nevis, including the southeast peninsula. The government delayed gazetting (issuing public notice of) the act until mid-1989 because of concerns of peninsula landowners that its provisions for public access to the coast would adversely affect their property rights (SK 3). Just as important, the Conservation Commission was still not operational as of mid-1990, and the designated chairman of the board had resigned in protest.

The failure of the government to enforce the NCEPA is consistent with other policy decisions that favor pro-development interest groups. The recommendation of the Land Use Management Plan for a new Environmental Management Unit has not occurred. The environmental laws in St. Kitts remain unenforced.

The authority to control public policy decisions that affect the environment is held within the closed circle of a few top political leaders. The chain of command that controls decisions favoring the use of the peninsula for intensive commercial development starts and ends with the Minister of Development, the Prime Minister, and the Attorney General, who thus far appear to favor pro-development policies. The advisory board has adopted environmental and land use standards, in the form of the Land Use Management Plan and Developer's Handbook, which appear to be guiding government

² The full purpose and jurisdiction of the board is contained in the Southeast Peninsula Land Development and Conservation Act passed by Parliament in late 1986. The Act was required by the Loan and Grant Agreement executed by St. Kitts and USAID in Article 5, Section 5.1(a).

³ Ibid.

policy to some extent.⁴ But, given the obvious lack of enforcement of environmental laws throughout the country, and the severely limited capacity of the government to undertake its own environmental planning activities, the future looks bleak for one of the most important wildlife areas in the Eastern Caribbean.

St. Lucia

St. Lucians describe the Piton mountains as "the breasts of their mother." These twin peaks, towering over the land as they rise from the Caribbean Sea, are widely recognized as the symbols of St. Lucia. They appear on the national flag, and on the logos of countless businesses. Should a resort be built between the Pitons, privatizing an area where a national park is proposed? In the words of St. Lucia writer Derek Walcott: "When the tribe sells the Pitons it has sold its mother, it has turned her into a prostitute."⁵

In November 1981, the Cabinet issued an Alien Landholding License to a private developer, enabling him to buy the Jalousie Estate. The developer planned to develop the site, located in the heart of the Piton mountains, as an exclusive tourist resort. By granting the license the Cabinet reversed its earlier decision to acquire the Estate as the key parcel within the proposed Pitons National Park. However, the developer apparently lacked the funds needed to build the resort, so the site remained undeveloped throughout the 1980s.

A series of events took place from late 1988 to mid-1989 underscoring how the Prime Minister and Cabinet represented the interests of the developer. In late 1988, the Cabinet issued a second Alien Landholding License to a new developer, the M-Group, a Swiss-based holding company. Although there is no public record of the meeting at which this decision was made, officials close to the project reported that the Cabinet granted substantial economic concessions to the developer and also gave an unusual incentive to the developer by approving public funds to build the main access road to the site.⁶

In January 1988, the DCA gave the developer an Approval in Concept for a resort project without a public hearing. It is important to realize that the Prime Minister holds the portfolios for Planning and Finance. This gives him control over policy decisions involving financial concessions and planning approvals. In the words of one senior civil servant: "When Cabinet approves economic concessions for the project it does suggest what the government wants, and whose wrath will be incurred if the project is denied. Cabinet makes its wishes well known. The choice not to develop the site is no longer feasible" (SL 5).

⁴ In addition to preparing the Developer's Handbook and Land Use Management Plan for the peninsula, the DESFIL team coordinated a series of field trips for government officials and members of the southeast peninsula advisory board, to illustrate how some tourist projects protect natural resources, while others degrade them. By all accounts, these field visits left strong impressions on the participants. It is hoped that this experience will lead eventually to added political support for the adoption of formal guidelines to regulate the development of the peninsula.

⁵ Taken from "Jalousie Argument Borders on Prostitution," *St. Lucia Star*, August 26, 1989, by Derek Walcott.

⁶ These developments are also discussed in Chapter Two.

The Prime Minister took action in March 1988, to show that he was willing to use his authority to represent the interests of developers. He made headlines in local newspapers when he presided over a ground-breaking ceremony for the Windjammer Landing Villa Hotel. This project has 190 individual villas spread over several acres above the Caribbean Sea, and includes a beach with private recreational facilities. It is a large project. At the ceremony, the Premier joked that "We are all participating in a criminal activity." He was right, as the DCA had not issued any permits for the project. The civil servants in the DCA were badly embarrassed. They fined the developer and appointed an ad hoc commission to issue conditions under which the project could be built. The villas were completed in 1989 (SL 13; *The Star*, April 30, 1988). The action of the Prime Minister showed how far he was willing to go, including flagrantly breaking national laws, to support the interests of private developers.

The Prime Minister took a similar action that reflected his control over the national planning process when he used the occasion of his annual address to Parliament in April 1988 to support publicly the developers of the proposed resort at the Jalousie Estate. During this widely reported speech he said: "Government has indicated its approval to an investment group to proceed with a touristic development on lands between the Pitons, without encroaching upon lands which have been earmarked as a National Park and nature reserve." At the time, the project had not received DCA approval.

The response to the Prime Minister's public support of the project was swift and blunt. Newspapers printed editorials within the week asking how a large resort could possibly be built in the center of the proposed park without degrading it.⁶ When the Cabinet secretly gave the landholding license and financial concessions for the resort, while taking no action to implement the park proposal, it showed clearly that the government favored the resort.

The developer enlisted the support of other political leaders in addition to the Prime Minister. In February 1988, the developer presented EC\$100,000 to the Soufrière Hospital Committee. The payment was delivered personally to the Minister of Health, who also holds the portfolio for the Environment. In March, the Minister of Communication and Works initiated construction of the access road. In May, after several newspapers published editorials condemning the way that the Cabinet secretly approved the resort despite the value of the Estate as a national park, the minister told a reporter; "Government fully supports the tourism development project, approval has been granted in principle to the Jalousie Plantation Company, the developers, and it's just a matter of time before approval is granted in full for the commencement of construction" (*Weekend Voice*, May 20, 1989). The same minister threatened to revoke the broadcast license of a local television station planning to televise a public hearing sponsored by the Concerned Persons on the Environment, an environmental group concerned about the negative impact of the resort (SL 4, 8, 13, 15).

It is believed that the developers were represented in negotiations with the political leadership to gain support for the project by a local attorney who is also chairman of the M-Group (the developers company) and Director of the St. Lucia Tourist Board. He also obtained the support of the national

⁶ The *St. Lucia Star's* editorial of April 22, 1989 was titled: "Must We Always Choose Sight Unseen"? It mentioned that the government had not taken any public position on either the resort or park, and concluded by saying: "It would do us all a world of good if the government came clean with all the facts of the matter. We should not be required yet again to make our choices in the dark of ignorance." The editorial in the *St. Lucia Voice* of April 29 was titled: "Piton Confusion." It said that the resort and park cannot both be located in the same area, and declared: "It is high time that the government make its position clear."

tourist industry for the resort. In April, when the Prime Minister used his speech to the Parliament to state his public support for the resort, he also announced that he was increasing the subvention to the Tourist Board by EC\$5 million, thereby linking the project to a national effort to increase tourism.

The developer also funded a grassroots organizing effort in the impoverished town of Soufrière near the Pitons. A local mason was hired to circulate a petition in support of the project. In May, the National Workers Union, the largest union in the country with 5,000 members and over 400 in Soufrière, announced its support for the resort. All of these actions reflect a focused effort by the developer to orchestrate support for the project.

Barbados

The development of the Bridgetown Fishing Harbor shows that when large projects, often funded by donor agencies, originate in the political directorate of a country, strategic political interests cause environmental problems to be ignored (B 2).

Expansion of the fishing industry has been a major goal of the Barbados government for 15 years.⁷ To carry out this policy, the Minister of Agriculture initiated two projects in the early 1980s. The first was a small fishing complex at Ostins on the south coast. The second was a major fishing harbor in the capital city of Bridgetown. This project, also known as the Cheapside harbor after the neighborhood where it is located, was initiated by the Ministry in 1983.

When he initiated and successfully completed the project, the Minister of Agriculture represented his own interests and those of the national political leadership, including the Prime Minister and Cabinet. The primary interest of the leadership is to stay in power. At the beginning of the project, the minister formed a coordinating committee with representatives from relevant government offices and assigned his Permanent Secretary of the Special Projects Division to be in charge of it. These actions consolidated the authority of the ministry within the government, giving it the political mandate necessary to build the harbor.

The significance of the project originating in and coordinated by the political directorate is emphasized by the following observation by a government official: "Projects such as the fishing harbor are often decided by one man, the Minister of Agriculture in this case, who decides that the project is good, and will be visible, so investigations of concerns like the environment are frowned upon, so bureaucrats don't or can't review them. Projects like this may be a white elephant, but they are big, and look good" (B 22).

After the Ministry of Economic Affairs reviewed the project, the government asked the IDB to provide funding for it, and, after the bank conducted its own economic analysis, the agreement was signed. With the funding in place, the Ministry of Agriculture had to obtain permission from national planning authorities before construction began.

⁷ The Barbados National Development Plans for the years 1979-1983, 1983-1988, and 1988-1993 describe how the fishing industry will be improved with the intent of decreasing food imports, lowering the balance of payments deficit, and providing additional food protein for the population.

In Barbados the planning authority is the Town and Country Planning Department (TCP). In September 1985, the ministry submitted a site plan to the department. When TCP evaluates a project like the harbor, it solicits feedback from other government agencies that have relevant expertise or jurisdiction related to it. This is called the "consultative process." On one hand, this process gives the planning authority considerable flexibility. For example, it theoretically gives natural resource managers the opportunity to have input into the planning process so that potential environmental problems can be identified. On the other hand, the informality of this approach reduces the accountability of the planning process because the minister who oversees the planning department determines whose input to accept. The result is that planning authorities give up control of the development review process to the political leadership.

As part of the consultative process, TCP contacted the Coastal Conservation Project Unit, the national agency responsible for coastal management. The CCPU happens to be funded by the IDB, the sponsor of the fishing harbor. Officials at the regional office of the bank asked the government to have the CCPU review the project (B 17). The CCPU had not been asked by the ministry to help with the design of the harbor (B 20). After reviewing the project, the CCPU staff identified four major areas of environmental concern, including long-term degradation of harbor waters from sewage disposal from live-aboard fishermen; adverse effects of dredging; changes in coastal dynamics caused by the breakwater, which could cause siltation of the harbor mouth or adjacent river mouth; and the impact of increased fishing pressure on limited fish stocks in the region (B 5, 20). No scientific information existed to address any of these concerns.

In January 1986, TCP approved the site plan for the harbor. The environmental concerns pointed out by the CCPU were not mentioned or included in the conditions of approval (B 22). During the 1988-1989 fishing season, the catch of the Barbados fishing fleet dropped 40 percent. It is not known if this is a cyclical drop or the result of over-fishing (B 29).

The political leadership was the primary pro-development interest group in this case. It wanted to build the harbor without the possible delays that would be caused by researching potential environmental problems, even though the result could be the decline of the regional fishery and sedimentation of the harbor. The manner in which the government pushed this project through the permit process, ignoring environmental concerns, supports the contention that large projects do not receive a thorough environmental evaluation when they are initiated in the political directorate, especially if politicians want the project approved before a national election (B 3, 20).⁸

HOW CIVIL SERVANTS ARE PREVENTED FROM IMPLEMENTING ENVIRONMENTAL POLICIES

While national policies are formulated by political leaders, civil servants are often responsible for implementing them. At the same time that many civil servants work to implement environmental

⁸ There was a national election in May 1986, four months after the project was approved. In interviews, civil servants said that ministers push large projects through the planning process when national elections are coming up to convince voters that they are productive. This means that large projects, which normally require the most careful planning, often receive the least attention from planning technicians.

policies, they are dependent on political leaders for their jobs. The relationship between politicians and civil servants prevents environmental policies from being implemented. The events that took place in all three countries shows how this happens.

St. Kitts

The small size of the government in St. Kitts gives political leaders nearly total control over civil servants, who could use their jobs to carry out environmental policies to protect the natural resources on the southeast peninsula. There are several ways that the political system exerts control over civil servants, preventing them from being involved in the planning process for the peninsula. The Physical Planning Section of the Central Planning Unit is under the jurisdiction of the Minister of Development. It has a dual responsibility for evaluating development proposals and examining the possible adverse environmental affects they could cause. But it remains unclear what the role of the PPS is in the development process for the southeast peninsula. The PPS is the only agency responsible for environmental planning, but it has no formal liaison with the southeast peninsula advisory board. The board's staff offered to train planning officials in environmental planning to help build the governments institutional capacity, but this offer was refused by the Minister of Development (SK 17).

The problems caused by the lack of integration between planning authorities and the advisory board were summarized in 1988: "It is imperative that planning('s) standing, and management and tenure policies with respect to the southeastern peninsula be defined. Given its high touristic potential it could be subject to all sorts of pressures, speculative and expansionist, in the near future."⁹ The decision by the Minister of Development not to integrate the national planning process with the development of the peninsula has the potential to prevent civil servants from implementing policies designed to protect its natural resources, although the environmental management tools provided by DESFIL (the Land Use Management Plan and the Developer's Handbook) appear to be gaining acceptance.

The government's refusal to create an Environmental Unit and make the National Conservation Commission operational has sent an informal message to civil servants, discouraging them from being involved in environmental planning. These policy decisions, combined with the lack of enforcement of several national environmental laws regulating coastal development, sewage disposal, industrial pollution, garbage disposal and beach mining, has created an atmosphere in which civil servants know that politicians do not want them to enforce environmental laws.

The political relationship between ministers and civil servants in St. Kitts also prevents the natural resources of the peninsula from being protected. As with other countries in the region, the government is based on the Westminster model. The authority for policy making is held by the cabinet of ministers. Other government bodies, such as the southeast peninsula advisory board, are merely advisory. Final decisions are made by the Cabinet and Parliament. In St. Kitts, and in the southeast peninsula project in particular, when environmental standards are not enforced, civil servants have little room for action. Control is exerted by political leaders over every aspect of the development process (SK 4).

To date, no projects have been built on the peninsula. This is reportedly due to a lack of sewage and water supply facilities, and a concern among developers that they will have to provide public access

⁹ Soler, 1988a.

to beach through their projects. The consultative process between the advisory board and government, based on the development guidelines in the Developer's Handbook and Land Use Management Plan, appears to be gradually gaining acceptance. However, once projects are actually under construction, with tremendous economic and political pressure favoring development, it is questionable whether the government's limited capacity for environmental planning will be sufficient to assure the protection of the peninsula's fragile natural resources.

St. Lucia

After the Cabinet granted an Alien Landholding License to Sir Colin Tennant in 1981, reversing its earlier decision to acquire the Jalousie Estate as part of a national park, a senior planner in the Central Planning Unit wrote the "Proposed Policy of Development at the Pitons, Soufrière." It included several recommendations to the Cabinet to protect the natural resources on the Estate, stressing its importance to the country. But, the Cabinet refused to adopt the report, so these recommendations were not implemented, despite the efforts of the Central Planning Unit.

The Chief Forestry Officer was the most outspoken environmental advocate in the government. He founded the Environmental Commission, which the Prime Minister has refused to certify, so it remains an unofficial body. In late 1988, the Ministry of Tourism asked the CFO to attend a meeting of officials who had voiced concern about the environmental impact of the resort project. He voiced concerns about the protection of the site's prime agricultural lands, and asked the ministry to provide information showing how these lands would be protected if the project was built. The ministry failed to provide the information requested, and excluded the CFO from further discussions about the project (SL 6).¹⁰ Similarly, the CFO has an interest in seeing that the prime fishing grounds adjacent to the Estate are protected, but has no direct voice in the policy process to present this viewpoint.

THE EXCLUSION OF ENVIRONMENTAL STAKEHOLDERS

Environmental interest groups are prevented from participating in the public policy process in all three countries. In St. Lucia, environmental stakeholders excluded from the decision-making process included civil servants responsible for managing natural resources, such as the forest, agricultural uses, and fisheries; the Concerned Persons on the Environment; and individual stakeholders who live and work in the area. As a government official said: "Development review is not public; the developer presents technical information to the Cabinet without input from others, so there is a bias for the developer due to the process" (SL 5). The lack of public participation has also prevented park advocates from building a local political base to convince politicians of the need for the park (SL 2, 13).

The Concerned Persons on the Environment was an ad hoc group of professionals and community leaders who started meeting in mid 1988 as a result of the secrecy surrounding the resort project and its conflict with the proposed Pitons National Park. Its members included leaders of the Catholic Church, the National Trust, the Naturalists Society, the Soufrière Development Committee, the Organization of American States, the Caribbean Conservation Association, and senior civil servants from

¹⁰ The Chief Forestry Officer was the first civil servant to advocate environmental reform in St. Lucia. He retired in 1990.

several ministries. The group was formed to increase the collective bargaining power of its members. To do this they sponsored unprecedented public meetings in Soufrière and Castries to express concerns over the Pitons controversy. The meetings were widely reported in the local press, but offers from its most influential members to meet with the Prime Minister were rebuffed (SL 4, 9).

The Catholic Church emerged as a major public voice in the Pitons controversy. It opposed the resort to protest the secrecy surrounding the public policy process, and was against privatization of the Pitons — the national symbol of St. Lucia (*Catholic Chronicle*, No. 4, April 1989). The opposition of the church to the commercial development of the Jalousie Estate is notable, as an estimated 90 percent of St. Lucians are Catholic. However, it is not clear that the Concerned Persons or the church has had any influence on the government.

Other parties that have an interest in protecting the environment of the Pitons are unorganized stakeholders that use the natural resources in the area for subsistence. This includes several individuals and families who live or work within the boundaries of the proposed park, such as fishermen who use the prime offshore reefs, herders, small farmers, squatters, and charcoal producers. These resource users have not been involved in the planning process for the park or the resort. Their interest in maintaining a healthy natural environment are represented indirectly by the Concerned Persons, but they have no direct access to the public policy process, including the Prime Minister, the Cabinet or the DCA.

Environmental stakeholders in St. Kitts face a similar situation. There are no environmental interest groups on St. Kitts. Individuals that depend on the natural resources of the peninsula are few in number. There are a few herders, one charcoal producer, and several squatters. These parties are unorganized, lack any formal representation, and have no voice in the decision making process. St. Kitts does have small organizations that promote the preservation of historical homes and the famous Brimstone Hill Fortress, as well as a horticultural society, but they have not been involved with the peninsula project. The Historical and Conservation Society in the neighboring island of Nevis has not been directly involved with the project.

There are several reasons why there are no environmental interest groups in St. Kitts. There is a lack of awareness among the citizens about the need to protect the environment. The low level of political and economic development on the island has discouraged such a group from forming, as it would be perceived as antidevelopment and antigovernment. The government controls the flow of information in the society. The only two regular newspapers on the island are published by the majority and opposition political parties. The only radio station on St. Kitts is run by the government news agency (ZIZ Radio). The Public Information Officer decides what issues to air on the radio and what stories to send to regional newspapers. Differences of opinion between the few individuals involved in policy making, including both civil servants and politicians, are deemed confidential, and people refrain from "airing their dirty laundry in public" (SK 4).

Because no organized environmental interest groups exist in St. Kitts, and the flow of information is controlled by the government, environmental issues are not part of the public policy debate. The result is a total lack of political pressure on the leadership to protect the fragile natural resources on the southeast peninsula.

Barbados does not have a tradition of supporting local environmental interest groups. Historically the public has not been concerned about the environment, and there was no public debate about the environmental consequences of the fishing harbor. However, a public dialogue about environmental problems is starting (30, 33). There are two pro-environmental interest groups in the

country, the Barbados Environmental Association and the National Trust. The BEA has several members from the civil service and business community. It was started in the late 1980s to promote an anti-litter campaign called "Keep Barbados Beautiful," funded by the Canadian International Development Agency. The Trust has successfully promoted the preservation of historic buildings and landmarks. However, these groups are hesitant to become involved in a public dialogue about larger environmental issues facing Barbados because of the risk of being branded as antigovernment.

The potential does exist for a public debate on environmental issues in Barbados because of the openness of the media. Barbadians have an adult literacy rate of over 90 percent and support three privately owned daily newspapers. Indirect public participation in the policy-making process occurs through several national radio call-in shows.¹¹ At most times of the day at least one call-in show is on the radio. These shows are reportedly listened to by Cabinet ministers, and have resulted in the government taking action on issues of concern to the public, such as an investigation of health concerns at a major chicken plant in 1989.

Radio call-in shows could serve as a surrogate for public hearings, which are not part of the national planning process. However, the fear does exist among civil servants, who are among the best educated and environmentally aware citizens, that their voices will be recognized on the radio by politicians who will exact retribution for any criticism leveled at the government.

¹¹ Three of the best known radio call-in shows are Tell It Like It Is, Getting Down to Business, and Gottaerperk (which roughly means to catapult or to shout directly). These shows are a good example of "bottom up" participation in the public policy process.

CHAPTER FOUR

RECOMMENDATIONS TO IMPROVE ENVIRONMENTAL POLICY IMPLEMENTATION

There are several actions that development assistance agencies and NGOs can take to improve the effectiveness of environmental policies. These recommended actions are intended to help counterbalance the effect of national politics within host countries on the public policy process. A cooperative effort is necessary to overcome the existing obstacles to environmental policy implementation.

CREATE LINKAGES TO BUILD INSTITUTIONAL CAPACITY

A coordinated approach is recommended to increase the institutional capacity within donor agencies, national governments, and NGOs. If the capacity to implement environmental policies is not simultaneously increased in all three types of organizations, the ability to create and carry out new policies will continue to reside with one or two major stakeholders, exclude key parties, and result in continued environmental degradation.

Donor agencies should allocate more resources to increase the institutional capacity within countries and their own agencies. Countries need to improve their performance in three areas: policy analysis, natural resource management, and long-term planning. Institution building for countries is needed on both the local and national levels as well as regionally. Regional organizations such as NGOs and quasi-governmental organizations, and regional coordinating bodies such as common economic markets can serve as conduits to increase international learning between countries. Donors should target regional organizations as well as national governments and local NGOs for institutional support.

Donors can help improve policy implementation by providing support to stakeholders through regional organizations when governments resist making changes on the national level. This can include funding regional training centers that specialize in teaching skills such as conflict resolution, environmental leadership, and project management. To help ensure that new environmental policies that accompany development projects are implemented, donors should make sure that the borrower has sufficient institutional capacity to provide a trained counterpart during project construction who will be available to help enforce mitigation measures intended to protect limited natural resources. This is crucial, given the shortage of trained personnel in many countries. In most instances, this counterpart will be from a ministry dealing with planning, land use, or some aspect of natural resource management.

Donor agencies should be aware that a program that is sufficient to increase a country's institutional capacity to protect its natural resources through environmental planning, policy analysis, and implementation will take several years. Environmental policies that are linked to a single project may need to be tied to a multiyear program to build the institutional capacity in the borrowing country.

Donors may have to require that certain objective criteria are met by a host country before agreeing to execute a loan agreement. Criteria can be agreed upon during preproject negotiations, and could include training of civil servants, implementation of consistent planning laws to unify land use controls, and making a conservation commission operable. The important point is to establish objective

criteria to help all concerned parties evaluate the effectiveness of measures needed to improve environmental policy implementation. Once the parties agree that the conditions for institution building are met, project funds can be released. This is essentially a form of structural adjustment, and is needed in many instances to transfer environmental policies from written laws to in-country action.

Donor agencies also need to build their own capacity for environmental planning. In many instances, field offices that are responsible for getting projects built do not have staff trained in natural resource management. As a result, it is almost impossible to enforce project-related conditions to protect the environment. It is crucial to have field staff participate in the writing of project-related conditions to make sure they are realistic and can be carried out.

CONDUCT STAKEHOLDER ANALYSIS AS PART OF IMPLEMENTATION STRATEGY

As the case studies show, the interest groups in a country can pose major obstacles to implementing environmental policies. Yet, new environmental policies introduced by donor agencies often lack a strategy to help ensure that policies are turned into the laws, workable guidelines, and coherent regulations needed to protect natural resources. In the analysis phase of a project, the donor should conduct a stakeholder analysis so that adequate time, technical resources, and funding are allocated to environmental policy implementation.

Conducting a stakeholder analysis involves identifying all of the parties that will be affected by the proposed project. It provides a detailed road map of how the political system includes and excludes parties affected by development projects. This analysis requires formal consultations with NGOs that are familiar with the political system and culture in the borrowing country. Many stakeholders, especially resource users who are typically excluded from the public policy process, are hard to find. They may be politically or socially alienated, and unwilling to participate. But, they possess valuable information about fragile natural resources that project planners need.

As part of the cultural stakeholder analysis, the analyst should identify who the stakeholders are, their interests in the project, who represents their interests, and how their interests are in conflict. This will show who makes policy decisions, and whose interests they represent.¹ By identifying the most powerful stakeholders, it will become clear what parties have to take part in any agreements for institution building or environmental protection so that a binding commitment is obtained.

¹ The stakeholder analysis should also include examining the form and structure of government of the host country. For example, if the government is structured on the Westminster model, wherein all responsibility for policy making is held by a few senior political leaders, the analyst should recognize this, and include steps in the implementation strategy to deal with it. This is especially crucial if the analyst is not accustomed to working within the Westminster system, which is very different from the more open and accessible U.S. model of governance.

The stakeholder analysis will also show who is excluded from the decision-making process. Often the interests of unorganized stakeholders, such as resource users who provide vital services for the society, are not represented by the political system. The analyst can use this information to design a process for including stakeholders that have not been part of the public policy dialogue, so that an institution building program can train resource users to become more efficient resource managers.

While the participation of the stakeholders is needed to improve the manner in which environmental policies are implemented, it is also beneficial to involve the stakeholders in project planning and design. The special knowledge that stakeholders possess about local environmental, social, economic, and political conditions can be used to influence the way that a project is designed and planned, significantly increasing the chances that it will meet its basic objectives while also protecting limited or fragile natural resources.

STRENGTHEN TIES BETWEEN INTERNATIONAL AND LOCAL NGOS

There are two types of environmental NGOs that are the focus of these recommendations — international groups headquartered in Washington, D.C., and the small, local and regional organizations that exist in most developing regions. Each of these groups needs to understand the way their particular strengths and weaknesses can be engaged in a process to strengthen local environmental policies. It is essential that a successful program to protect limited natural resources use the capabilities that these organizations possess.

The strengths of international NGOs include their ability to obtain funding; technical expertise, including project administration and management; and the practical experience they have obtained by participating in conservation projects all over the world. Their weaknesses often include a lack of credibility with political leaders in developing countries, who are often distrustful of outsiders; the difficulties inherent in operating in countries that possess many different cultures; and a lack of awareness about local political conditions.

Environmental NGOs located in developing countries are able to operate effectively in the local political system and are aware of cultural norms that underlie the public policy process. They are weak because they are small, lack adequate financial support, and often do not have the direct access to political leaders that is needed to influence development decisions. By combining their efforts, international and local NGOs can use each other's strengths to compensate for their weaknesses. There are two ways that NGOs can work cooperatively to improve policy implementation.

STRENGTHEN RELATIONSHIPS BETWEEN LOCAL NGOS AND RESOURCE USERS

Local NGOs should develop programs to strengthen their relationships with resource users such as farmers, fishermen, and charcoal producers. There are two ways to do this. First, NGOs can talk to resource users to educate them about the environmental damage caused by traditional forms of development, such as large tourist resorts that damage fishing grounds, close off access to the coast, and so forth. Second, NGOs can work with resource users to help make them more efficient producers. This

can be done by sponsoring programs to examine how resource users operate, and then designing a strategy to increase the efficiency of their operations in a manner that is environmentally sustainable.

This could include observing the habits of local fishermen that may be environmentally harmful, such as dynamiting reefs or overharvesting certain species. The NGO could work with fishery biologists to identify species that can be safely harvested, and train fishermen in the techniques needed to catch them. Then, the NGO could act on behalf of a fishing community to seek funding from a donor agency to build facilities for storing, processing, and marketing the fish that are caught.

By creating this kind of downward linkage with resource users, NGOs will generate economic and political benefits for both groups. This can translate into stronger political influence with the government, which in turn will strengthen both stakeholders in the public policy process.² If international NGOs participate in this effort by funding local NGOs, coalitions will be formed between local NGOs, international NGOs, and resource users, increasing the effectiveness of all three parties.³

IDENTIFY AND TRAIN ENVIRONMENTAL LEADERS

The policy-making process in many instances is greatly influenced by a few people with strong personalities who have developed the skills needed to operate successfully within the political system. One way to influence public decision making is to train individuals who are likely to assume leadership positions in their countries. No one knows local political and culture conditions as well as those who have grown up and worked in a country. For example, only local people really understand the subtleties and opposition politics with any particular government, and how to talk to political leaders.

To train future leaders who are likely to place environmental problems higher on the public agenda than is currently the case, local NGOs can identify civil servants and political leaders that show exceptional promise, and can judge the likely candidates for advanced training. Once candidates for environmental leadership training are selected, international NGOs, in cooperation with supportive donor agencies, can use their expertise in administering and funding training programs to train the candidates. Training could include conflict resolution techniques, communication skills, project administration, and policy analysis. This should be an ongoing program — part of an institution-building effort in selected regions. Ideally, it would take the form of a permanent training center, perhaps a joint effort of more than one NGO, with field offices where training would take place.

It is important that the training be designed specifically for the political and cultural conditions encountered in developing countries. In addition to training future leaders, this approach will build

² Carpenter and Kennedy, 1988. See pages 216-18. Carpenter and Kennedy discuss the value of being able to reward the other side for cooperation, the importance of a sound alternative, and the ability to cause harm by increasing a cost. Stakeholders who are excluded from development decisions can offer all of these incentives to political leaders in exchange for their participation in decision making.

³ See Leonard, 1989. Leonard describes strategies that combine environmental protection with improving the quality of life for poor resource users; see pages 31-43. In McNeely and Pitt, eds., Pitt discusses the effectiveness of linking resource users to national environmental planning programs; see p. 283.

coalitions between future decision makers, NGOs and donors, as well as promoting learning between governments. This is a form of technology transfer from industrialized countries to developing nations that supports sustainable development.

CHAPTER FIVE

ACTION PLAN FOR THE FUTURE

This study of the Caribbean has found that new public policies fail because they do not account for local political, cultural, and economic conditions. Environmental concerns are treated as tangential to the development process, with policies, laws and regulations intended to preserve natural resources treated as add-ons. Environmental policies required by donor agencies are seriously constrained by the temporal limits of the project cycle, and the lack of political will within countries and the agencies to embrace procedural reforms that threaten the way they do business.

This paper has focused on one aspect of environmental policy implementation — the obstacles that are created by national politics in host countries. However, there are other reasons why public policy initiatives, such as environmental policies, fail. New public policies that are imported, ignore local culture, and exclude key stakeholders rarely succeed. The experience of several donor agencies in developing countries shows that a new, more open approach to policy making needs to be developed. This open system needs to include all affected stakeholders, including donors, national political leaders, international and local NGOs, and resource users.

This new, more open system of policy making also has to account for the relationship between local cultural norms and politics — the "culture of decision making." Culture and political decision making are inseparable. Politics in many developing countries are intensely personal, and affected by a history of dependency, insularity, and distrust of outsiders. Innovation in policy making requires that politicians and civil servants take risks, which is difficult to do without upsetting political leaders. The important role of opposition politics is often not understood by outsiders.

In addition to the obstacles created by national politics and the culture of decision making, linkages between environmental and economic policies have to be developed to reflect the near-total reliance of countries on short-term economic development strategies. The conflicting behavior within donor agencies, between political appointees and environmental technicians, also has to be considered. Therefore, efforts to improve environmental policy implementation have to account for four key factors: politics within host countries, politics within donor agencies, the culture of decision making, and the reliance on short-term development strategies.

To incorporate the lessons from the case study research and show the way new environmental policies can be better implemented, three activities can be undertaken.

- A project-specific training program can be developed, integrating the lessons from the case studies, to show the stakeholders (staff from a donor agency, host country, and NGOs) how a more open approach to decision making can help to implement an actual set of environmental policies. This could be done under the auspices of the DESFIL program, and attached to a specific project that is underway or in the planning stage.
- Additional case research can be carried out, focusing on current activities in the donor agencies, to determine how a more open model of decision making can be created within

the project cycle to account for the four basic elements of policy implementation in developing countries. This would involve working with donor agency personnel and NGOs to identify the specific opportunities and constraints to the more open approach, and estimating the financial and technical resources that are needed to make it work.

- A training program can be instituted, based on the model of collaborative negotiation and dispute resolution developed at the Harvard Program on Negotiation, to give participants the personal awareness and communication skills needed to operate more effectively when trying to implement new public policies. Participants to receive this training could include staff from donor agencies, NGOs, and consulting firms which are involved in mediating policy disputes on a regular basis. Attention would be given to improving negotiation and mediation skills. The curriculum would be designed to reflect the special needs of the participants and the actual cultural, political and economic conditions found in developing countries.

These steps are offered as a way to follow up in a practical way on the case studies presented in this paper, to improve the ability of the participants in the environmental policy process to actually implement policies that are often left on paper.

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