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**Decentralizing Natural Resource Management:  
Some Issues Regarding Sub-District Environmental  
Planning and Implementation in Uganda**

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This discussion paper is prepared by Center staff and collaborators. WRI takes responsibility for choosing the topic and guaranteeing authors and researchers freedom of inquiry. Unless otherwise stated, all the interpretations and findings are those of the authors.

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## I. Introduction

Since assuming power in 1986, the National Resistance Movement (hereafter government of Uganda - GOU) has made strides to address environmental and local development issues. Most environmental attention has focused on national-level issues, such as reforming natural resource policies and legislation, establishing new institutional structures, and developing a national environmental strategy and action plan. In 1986, the GOU established the Ministry of Environment Protection, since merged (in 1992) with other ministries/departments to form the Water, Energy, Minerals and Environment Protection (MWEMEP). And in 1990, it began preparing a National Environmental Action Plan (NEAP) -- now under the direction of the NEAP Secretariat. The goal of the NEAP is to define policy and legislative actions, institutional strengthening guidelines, and potential investments for a more environmentally sustainable national development strategy. Other environmental efforts, particularly sectoral and resource-specific actions, have also been undertaken by relevant line ministries and departments.

Concurrently, the GOU has addressed issues of local governance and development. These include decentralizing administrative responsibilities and political authority for development purposes, and strengthening relevant sub-national institutions. The GOU's multi-faceted decentralization program is principally under the direction of the Ministry of Local Government's (MLG) Department of Planning and Decentralization Secretariat and the Ministry of Finance, Planning and Economic Development (MFPED), although various line ministries/departments have also been involved.

More recently, the GOU, principally the MWEMEP's Department of Environment and NEAP Secretariat, began addressing issues of local-level natural resource management. Most of the attention has focused on devoluting power and responsibility for development/environment planning and management purposes to the district-level. The GOU recognizes that the participation and direct involvement of local people is critical to effective resource management and environmental protection. Most local (and national) economies are resource-dependent; local people are the principal resource users and managers, and, as a result, the most impacted by environmental degradation and declining productivity of the resource base. Recognizing the constraints for direct popular participation in district planning and implementation, the MWEMEP has become increasingly interested in developing options for devoluting natural resource management responsibilities below the district level.

This report addresses some aspects of sub-district natural resource management, principally environmental planning and implementation (EPI). EPI refers principally to the design and implementation of development plans which are environmentally sound, although it may also result in resource-specific or environmental management

actions. Equally important, EPI refers to the development of site-specific, community-level actions as well as district, county, or sub-county wide actions.

The purpose of this report is to present some preliminary perspectives and proposals regarding sub-district EPI and to stimulate further discussion and debate.<sup>1</sup> It assumes that on-going decentralization efforts proceed and that many of the proposed initiatives are realized, including the approval and effective implementation of the draft Local Governments Bill and the posting of District Environmental Officers (DEOs). It recognizes that these on-going/proposed initiatives, principally district-level actions, are GOU priorities and that the success of sub-district EPI will require additional manpower, technical expertise, and resources, financial and otherwise.

The report begins with a brief overview of the GOU's decentralization efforts, followed by a summary of environmental decentralization activities. Some issues regarding sub-national EPI are discussed, followed by discussions of sub-district, principally sub-county and community EPI. It concludes with a series of preliminary options and recommendations regarding the strengthening of sub-district EPI. The report has been prepared for USAID - Kampala and the MWEMEP's Department of Environment and NEAP Secretariat.

## II. Government Decentralization

Uganda's legal system for decentralized administration and political authority was first introduced by the British colonialists and later incorporated and strengthened by the independent governments. A mosaic of policies, ordinances, and acts currently constitutes Ugandan decentralization, including the 1967 District Administrative Act, the 1969 Urban Authority Act, the 1987 Resistance Councils and Committees Statute (No.9), and the 1988 Resistance Committees (Judicial Powers) Statute (No.1).

During the German colonial period (1899-1919) of "indirect" rule, the indigenous governance/authority structure was formally recognized, supported, and, as a result, strengthened. The British powers, however, significantly modified the traditional political structures and responsibilities. Multiple levels of public

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<sup>1</sup> This report does not address district, national, regional, or global environmental management by the GOU, except as they relate to sub-district EPI. Further, in emphasizing EPI, it does not address other critical environmental management issues, such as environmental policies and legislation (including district by-laws), environmental education, environmental impact assessments, and environmental standards.

administration were established, including provincial authorities and districts headed by District Commissioners. The British also appointed chiefs for each sub-parish, parish, sub-county, and county, who were responsible for administration, tax collection, development, law enforcement, and adjudication.

The chiefs were strategically selected to ensure British control and influence over the people (The county chiefs reported directly to the District Commissioner.). This policy of appointing chiefs to meet political objectives continued after independence. Many chiefs abused their positions and powers, and local people grew increasingly suspicious of them and less supportive of their leadership. Although traditional community authority was retained, the village leaders were undermined and their capacity to supervise and mobilize people was hindered.

After independence in 1962, the constitution provided for decentralized government, based in part on the existing British system. A system of development planning was established at the district level by District Teams and Planning Committees which consisted of representatives of the central ministries and departments at the local level (i.e., civil servants selected by central government). These Committees were not particularly effective, and in 1967, a new constitution put into place a highly centralized system of government which remained through Obote's and Amin's regimes.

The current GOU has worked to decentralize administration and undertaken multiple actions to strengthen local government. These measures include:

- \* Redefining local administrative units at various levels to make them more efficient managerially (smaller geographic regions, smaller population) and responsive to local circumstances (i.e., from 34 district in 1986 to 42 in 1993, now including 220 counties and approximately 1185 sub-counties);
- \* Strengthening local authorities to enable them to better perform their functions, including development planning and implementation. District Executive Secretaries (DESS) have replaced District Commissioners; District Administrators have been appointed as the principal links to central government; and District Development Committees (DDCs) -- including both elected officials and civil servants -- have replaced the District Teams and Planning Committees;
- \* Drafting a new constitution that is sensitive to local government, rural development, and local-level environmental management (see below); and

- \* Preparing multiple sub-national development and environment profiles and plans (i.e., water, women, population, physical plans at county, district, and multi-district levels). The MLG and MFPED have spearheaded these efforts, although other ministries have also been involved, including the MWEMEP's National Environmental Information Centre (NEIC) and the Ministry of Land, Housing and Urban Development.

Three components of the GOU's decentralization program are particularly important because of their implications for local-level natural resource management and environmental protection. These include the formation of Resistance Councils and Executive Committees, the drafting of a new Local Governments Bill, and a pilot District Development Planning project.

Resistance Councils and Executive Committees. In response to the decline of government authority at the local level, the GOU, established a five-tiered system of Resistance Councils (RCs) and Executive Committees -- community, parish, sub-county, county, and district. Each RC at every level includes an Executive Committee of 9 members with separate responsibilities, including a Chairman, Vice-Chairman, Secretary, Secretary for Youth, Secretary for Women, Secretary for Information, Secretary for Mass Mobilization and Education, Secretary for Security, and Secretary for Finance. Community RC members (RC1) include are residents 18 years and older; higher-level RCs include all Executive Committee members of the RCs immediately below them and in their area of jurisdiction. The members of the Executive Committee are elected by the RC members. RC5, RC4, and RC3 Executive Committee members are paid; RC2 and RC1 Committee members are volunteers.

The RCs are responsible for local policy making, particularly with regard to development planning and implementation (RC3 and RC4 Executive Committee members are part of the DDCs). Initially, conflicts over authority, roles, and responsibilities arose as a result of the dual administration of RCs and chiefs, as well as of RC5 Chairmen and District Administrators. Strong GOU support of the RCs has fostered their growth in power, often at the expense of the chiefs and District Administrators (The draft constitution proposes that RCs be renamed Local Government Councils as a means to apoliticize local administration and ensure continuity across political regimes.).

Local Governments Bill. The MLG and its newly established (February 1992) Decentralization Secretariat have focused their efforts on drafting a new decentralization law -- the Local Governments Bill -- which will harmonize the previous decentralization statutes and further strengthen local government. It is hoped the Bill will reach the House of Parliament for debate and ratification by June 1993. Certain aspects of the new

decentralization program which do not require legislative action for implementation will be initiated in July 1993, the beginning of the next fiscal year. For example, financial decentralization will be initiated in 13 districts in July 1993 (a second group of 13 districts will be added in July 94, and the remaining districts will be added in FY 95).

The most recent draft of the Local Governments Bill features several changes to the current structure with potentially significant implications for local governance and development. These include:

- \* Eliminating sub-parish chiefs as local authorities and thereby, in effect, dissolving the sub-parish as an administrative level -- there is no RC at the sub-parish level;
- \* Strengthening the county by upgrading the level of personnel, including replacing county chiefs with the current Assistant DESs;
- \* Better defining the roles and responsibilities of chiefs, RC Chairmen, DESs, and other officials. For example, the RC Chairmen will be formally established at the local political heads; the chiefs will be the principal policy implementors and law enforcers; the DESs will become under-secretaries (one step below Permanent Secretaries), but accountable to the RC5 Chairmen; and the District Administrators will be responsible for local administration such as accounting and bookkeeping;
- \* Decentralizing finances, including diverting central government funds earmarked for extension services from their parent line ministries in Kampala (14 ministries are involved) to the districts, and allowing sub-counties to retain 30 percent of the graduated tax ("able-man" tax) they collect for local administration, development, and other purposes; and
- \* Strengthening the district level by empowering district authorities to oversee (and possibly select) the technical extension staff. In so doing the extension staff will become accountable to the district authorities, rather than the relevant line ministries. The ministries will emphasize policy making, reforming legislation, setting standards, overall planning and supervision, inspection, advising, and coordination.

District Development Planning. From 1989 to 1991 the MFPED and MLG (principally the Department of Planning) led a pilot District Development Planning exercise. The effort was assisted by other ministries/department's (included the MWEMEP's Department of

Environment) and supported by the European Economic Community (EEC) and World Bank. It involved designing a district development planning methodology, undertaking pilot planning exercises in 3 districts (Mbarara, Iganga, and ? Districts), developing a training program in the planning methodology, and analyzing alternative funding mechanisms for implementing the plans. Some of the project's recommendations are being implemented -- including the placement of environmental officers at the district-level -- but none of the pilot plans have been implemented, only one other district (Rakai District) has prepared a development plan based on the proposed methodology (DANIDA supported), and there has been no systematic training of district planners and DDCs in the planning methodology. The planning methodology has been criticized for being too complex and not involving individuals/institutions below the district.

The GOU's decentralization efforts have addressed and impacted administrative units at various levels, but they have focused on strengthening the districts. Eventually, the GOU intends to empower public authorities below the district level for development/EPI purposes, but, at present, it recognizes that more work needs to be undertaken at the district level. For example, in addition to helping draft the new Local Governments Bill, the MLG's Decentralization Secretariat is responsible for training, sensitizing, institutional development, financial management, and coordination, and the MFPED is responsible for development planning and training. Pressing national needs and interests (principally structural adjustment and macro-economic reform), have diverted scarce government resources and technical expertise from decentralization activities.

### III. MWEMEP Decentralization

The MWEMEP's Department of Environment and NEAP Secretariat have undertaken significant work at the national level, including identifying key environmental problems, reviewing existing national natural resource policies and laws, drafting a national environmental bill, and developing a new national institutional structure, specifically the National Environment Management Authority (NEMA). NEMA's principal duties and responsibilities would be to advise the GOU on environmental policies and strategies, and to provide supervision, liaison, technical advice, and coordination with sectoral ministries/departments, district authorities, the private sector, and NGOs dealing with environmental issues. One of its goals would be to have rural environmental problems identified and managed by local people. Consequently, the NEMA staff would include a community outreach specialist whose primary responsibilities would be to identify and assist in designing, implementing, and monitoring local environment/natural resource programs and actions.

Some attention has also been given to NEMA-District linkages as one means of involving resources users in local environmental management. It is proposed that districts enlist the support and participation of local people by collecting, processing, and disseminating environmental information, and by "building local environmental planning capacity to enable local people to sustainably manage their own environment" (NEAP Secretariat, 1993; p.19). With assistance from NEMA, districts will develop their own environmental plans through the RC system and traditional leaders, NGOs, cooperatives, and farmer associations. Eventually, it is expected that districts will "develop the technical and financial capacity to conduct environmental planning and initiate protection measures, without input from central government" (NEAP Secretariat, 1993; p.22).

At least four models have been developed to strengthen NEMA-District linkages, including:

- \* Formation of a District Environment Sub-Committee (DEC) within the District Development Committee (DDC) and the posting of a District Environment Officer (DEO);
- \* Formation of a DEC within the District Resistance Council (DRC) and the posting of a DEO;
- \* District officers from other ministries/departments enlarge their mandate to include the environment; and
- \* Formation of a DEC within the DDC with the posting of a DEO. Responsibility for environmental planning and activities given to an existing RC member at all RC levels.

The last model -- the DEC/DEO/RC Environmentalist model -- is the MWEMEP's preferred structure for decentralizing environmental planning and management. It both retains the perceived strengths of the other three models and adds strong linkages to the grassroots. In July 1993, the Department of Environment will post a DEO in the same 13 districts scheduled for government decentralization, encourage districts to create DEC's, and encourage RC Executive Committees at all levels to select one member to be responsible for environmental matters in his/her area of jurisdiction.

It is proposed that the DEOs will provide environmental planning assistance to the districts (i.e., help gather environmental information, identify environmental problems, advising district authorities on environmental issues) and further the NEAP process at the district level. The principal responsibilities of the DEC's will compliment those of the DEOs -- assist in developing district environmental actions, integrating environmental concerns into the district development plans, and recommending district environmental

policies and by-laws to the RC5s. The RC Environmentalists will initiate and coordinate environmental planning at his/her RC level (with the help of the DEO and DEC), mobilize communities for environmental activities, and receive and share environmental information through the RC system.

Concurrently, the NEAP Secretariat will focus its efforts in 6 pilot districts -- Arua, Kampala, Mbale, Mbarara, Kabale, and Kasese (The Department of Environment and NEAP Secretariat activities will overlap in Arua, Mbale, Mbarara, and Kabale Districts.). The purpose of the pilot districts is to build local capacity in managing environmental issues. The specific actions within the pilot NEAP districts are still being considered, but will involve testing different techniques for land-use/environmental planning and implementation. It is expected that the NEIC will assist in preparing District Environmental Profiles, and both the Makerere Institute of Social Research (MISR) and the Institute of Environment and Natural Resources (IENR) will provide technical assistance. In addition, the Grants Management Unit (GMU) of USAID's APE will provide resources to local organizations for project assistance work in the pilot districts.

#### IV. Sub-National EPI: Some issues for Consideration

Several issues regarding sub-national development/environment planning and implementation have implications for effective EPI at any administrative level in Uganda. Many of these factors are not unique to Uganda and are common in other African nations with decentralization programs and experiences.

- \* All local administrative levels in Uganda have responsibilities in development/environment planning, but few below the district recognize their roles and prepare plans;
- \* There is limited expertise in development planning, particularly environmental planning, at the local administrative levels. The staff of only a few administrative levels (11 districts) include professional planners, and these have experience in national planning. While national plans emphasize economic factors, local plans requires more consideration of social, cultural, political, and ecological conditions;
- \* DDCs are not effective planning institutions. DDCs usually consist of 40-60 individuals, they are too large and complex to be efficient in developing plans and reaching consensus on actions. Even organizing DDC or DRC meetings are difficult and time consuming;
- \* Local development plans which are prepared usually

emphasize two program areas -- administration and government infrastructure such as health services (including provisions of safe drinking water), government buildings, educational facilities, and roads. The concern that district development plans reflect national goals and objectives, overrides interest in addressing local priorities and needs. Although DDCs usually include two representatives from each of the district's sub-counties (usually RC3 Committee members), the plans contain few community-level actions, aside from an occasional site-specific project favored by one or more of the district authorities -- often for political and/or personal gains. As a result, local people perceive district plans to be as distant and removed from their principal problems and potential options as national plans;

- \* There is significant local environmental information at the community, sub-parish, parish, and sub-county levels, but few data are recorded, analyzed, or shared with higher administrative levels, including the districts. Multiple reports are prepared and sent to the next administrative level, some monthly, but only information requested by other levels is shared (primarily data associated with revenue collection -- population, number of households, wealth indicators, such as number of livestock, cash crop acreage, perennial crop production, etc.). The information has not been effectively utilized to assess local environmental problems and plan appropriate actions;
- \* There are several effective methodologies for development/environmental planning at the community level, such as Participatory Rural Appraisal (PRA), but few for higher local levels. Those which exist are more often complex, requiring significant time, resources, and technical expertise;
- \* RC1 and RC2 Executive Committees are voluntary positions and the salary of RC3, RC4, and RC5 Committee members is insufficient to enable them to devote full-time to local government matters. Many hold these positions for purposes of social and cultural gains, such as local power, prestige, and honor, rather than for their salary (although social status often leads to economic opportunities). These may be insufficient incentives for them to undertake EPI. Equally important, RC Committee members have two-year mandates, resulting in a regular turnover of personnel, little consistency, and training difficulties;
- \* Only districts and sub-counties have the authority to

collect and retain government revenue. At present, most district funds come from three sources -- central government grants (The amount depends in part on the number of people and the size of the district.), 70-100 percent of graduated tax collected by the sub-county, and an array of other local taxes/fees/rents/market dues which vary from district to district (trading, income, and some other taxes are collected directly by the central government). Some sub-counties retain up to 30 percent of the graduated tax and a few levy additional taxes/fees/fines on their constituencies. Graduated tax ranges from 6000 to 40000 shillings per "able" man per year; the amount -- set by the RC3 Committee -- depends on the man's wealth and ability to pay. The money available to districts and sub-counties is insufficient to support the range of investments needed for development and environmental management. And often when the money, technical expertise, and other necessary resources become available, implementation is often further delayed or abandoned. Resources for local development also come from the international development assistance community, most are channeled through the central government, but increasingly they are sent through local governments;

- \* Much local development and EPI is undertaken independent of government by individuals and communities, often with support from multi-/bi-lateral donor agencies, international PVOs, national NGOs, grassroots organizations, cooperatives/farmer associations, and the private sector. While these efforts are often significant, they should not reduce or replace government responsibilities and investments in development;
- \* Only districts have the political authority to establish by-laws (Sub-district administrators are to share their legislative needs with district authorities for the enactment of district-wide by-laws.). Even so few districts have effectively exercised their powers to establish by-laws for purposes of environmental management, and most existing environmental by-laws fail to account for the area's specific characteristics and circumstances (most are generic and standard across districts). Most environmental by-laws also emphasize conservation and protection, over management, and most are prescriptive (often mandating inappropriate local actions) and punitive (sanction-laden), rather than flexible with incentives to encourage effective resource use. Because district officials often lack knowledge of community priority needs, constraints, and resources, district by-laws are usually made in an information vacuum;

- \* The full compliment of extension staff reaches down to the county level, and there is some technical expertise -- usually an agricultural assistant, veterinary assistant, forest ranger, and health inspector -- at the sub-county level. An assistant, often a local resident, has received some technical training, but does not hold a university degree. All extension staff have only limited trained expertise on natural resource management and environmental protection; and
- \* Although the legitimacy and effectiveness of government authority has been restored at the local-level, the civil servants still often have difficulty mobilizing rural people to undertake development/environment activities. Local people have little "spare" time and few resources to invest in environmental activities which -- because of being unfamiliar with many of the proposed practices - - they often perceive as risky and having minimum, long-term benefits.

These concerns result in a sub-national EPI dilemma. On the one hand, district-level planning has been difficult and general ineffective, and district development plans have not addressed community-level priority needs or environmental management. On the other, while NGOs and grassroots organizations have worked effectively at the village-level to plan and implement environmental actions, experiences from many African nations (i.e., Tanzania and Gambia village-level development planning initiatives) suggest that it is not feasible or realistic for any government, including the GOU, to work directly in each community/RC1. This EPI vacuum at the local level has hindered sub-national natural resource management and resulted in environmental degradation.

At least three options can be identified to better sub-national EPI -- improve district EPI to facilitate the preparation of district plans that address local needs (i.e., "rural" district development plans); streamline community EPI to enable civil servants to work directly with each RC1 and facilitate actions in each village; or work at an intermediate administrative level to undertake EPI. Given sufficient resources, technical expertise, and time, each of these options can perhaps be satisfied. But considering the current circumstances (including the concerns outlined above), the changes needed to achieve each option, as well as their costs, it is not practical for the MWEMEP to focus all of its decentralization attention and resources on improving either district EPI or community EPI. The DEOs, DEC, and RC Environmentalists will improve local environmental management, but their training needs, early commitments, priorities, and primary responsibilities will not allow them to allocate the time needed to develop new methodologies and prepare "rural" district development plans or undertake "rapid" PRAs in each of the

district's communities.

The administrative/RC level between the district and community selected for EPI should be the unit most capable of effectively developing and implementing "rural" development/environmental plans throughout Uganda with the fewest (realistic) changes to current conditions, the least expenses, and the least direct involvement by the GOU. Administrative levels between the district and community include the county, sub-county, parish, and sub-parish; RC units between the district (RC5) and community (RC1) include the county (RC4), sub-county (RC3), and parish (RC2).

Some of the issues raised above pertain to each of the four intermediate levels. Among the more pertinent aspects of each level with regard to EPI level include (sub-county characteristics are considered in the next section.):

### County

#### Advantages

- \* Representation in national government -- each county is represented in central government by a Member of Parliament.
- \* Local authorities include the RC4 and chief (Assistant DES after the Local Governments Bill is approved).
- \* Full compliment of technical expertise.
- \* Feasible number in Uganda (220 counties).

#### Disadvantages

- \* Although most county headquarters have the facilities to handle and store information, most have limited data on local conditions, including environmental trends.
- \* Not a corporate body; no political authority to collect government revenues or levy taxes for development purposes.
- \* Each county includes too many communities to allow for direct village-level participation in county EPI.

### Parish

#### Advantages

- \* Local authorities include RC2 and chief.
- \* Close to the community/RC1 level.

#### Disadvantages

- \* Too numerous in Uganda for direct GOU action.
- \* No technical extension staff.

- \* Few incentives for RC participation in EPI (RC members not paid).
- \* No representation in district or national government.
- \* Not a corporate body and not legally empowered to collect government revenues.

### Sub-Parish

#### Advantages

- \* Close to the community/RC1 level (each sub-parish includes on average 3-4 communities).

#### Disadvantages

- \* No political authority -- no RC and the new Local Governments Bill will eliminate chiefs.
- \* No technical extension staff.
- \* Too numerous in Uganda for direct GOU action.
- \* Not a corporate body and not legally empowered to collect government revenues.

While the disadvantages clearly outweigh the advantages in parish and sub-parish EPI, the county has several important features which suggest that it might be an appropriate EPI level. It has political and technical advantages, and the number of counties in Uganda is realistic for direct GOU involvement. The county disadvantages, however, represent significant obstacles -- particularly financial -- to achieving EPI that is truly participatory. Equally important, in its on-going effort to streamline government -- national and local -- the GOU is considering phasing out certain local administrative levels, including the parish and county. All investments in county EPI at this time are at risk.

### V. Sub-County EPI

The consensus among the officials interviewed in this work from government institutions, non-governmental organizations, for profit enterprises, and international development assistance agencies is that the sub-county is the preferred administrative level for EPI below the district. Among its advantages are:

- \* Lowest administrative level with government infrastructure, including RC3 Executive Committee, chief, extension staff, tax office, police unit, and a prison;
- \* Lowest administrative level with extension officers -- principally an agricultural assistant, a veterinary assistant, a health inspector, and a forest guard/ranger;

- \* Sub-county planning committees -- including the chief, the RC3 executives, and the 2-4 representatives of government departments -- which are potentially more effective planning unit than the 50+ member DDCs;
- \* Highest administrative level which local people believe represents them;
- \* Highest administrative level of implementation and meaningful local involvement ("the sub-county presents the 'local' level in Uganda" (Turyatunga, 1990; p.1)). Each sub-county includes an average 8-9 villages and 15,000-30,000 people;
- \* A legal corporate body with the power to sue and be sued. The lowest administrative level with political authority to collect taxes, principally graduated tax -- from which the sub-county can retain up to 30 percent for local development (the remainder is sent directly to the parent district, by-passing the county). Sub-county authorities also have the power to levy taxes, collect fines, impose charges, etc. to collect funds for local development purposes;
- \* Highest administrative level with accurate knowledge and good understanding of local problems and opportunities for development/environment planning as well as preparing environmental profiles;
- \* Lowest RC level in which the members are paid for their services; and
- \* Lowest administrative level directly represented in the district (Each DDC includes 2 representatives from each sub-county, usually RC3 members -- although this may soon be reduced to 1 representative as a means to improve DDC planning.).

The principal disadvantages of the sub-county as the primary EPI level include:

- \* 1185 sub-counties in Uganda (approximately 30 sub-counties per district);
- \* Limited development/environment planning expertise and experience. Actions are identified in an ad hoc fashion, often as a result of a natural or man-made crisis;
- \* Limited financial resources for development purposes. The 30 percent retention amounts to 0.5-10 million shillings per year depending on the wealth of the sub-

county -- graduated tax is based on an individual's wealth (The salaries of the sub-county authorities are paid by the district from central government funds.). As a result, most sub-county funds support administration and infrastructure development, and little money is directed to environmental and village-level actions;

- \* Despite opportunities, there is limited community-level participation in sub-county government. Increased participation would lead to increased accountability and transparency, and improve planning;
- \* Limited technical expertise -- agricultural assistant, veterinary assistant, health inspector, forest ranger. Most assistants have received some training, but few, if any, have a university degree (most are local residents). For example, agricultural assistants may have received training in cash crop production, but not subsistence crops, and few have any formal training in resource management. Rangers are guards/policemen often with not technical expertise;

There is no methodology and procedures currently available in Uganda for effective sub-county EPI. New methods will need to be designed, field-tested, and refined, although it may be possible to adapt certain tools and techniques from other planning methodologies for other administrative levels (i.e., PRA for community EPI). However developed, the sub-county EPI methodologies should follow certain basic guidelines, including:

- \* The methodologies should be inexpensive, quick, and simple; locally managed by the sub-county planning committee; and transparent to the local people;
- \* Flexible to enable sub-county planning committee to adapt the procedures to the specific and changing local circumstances, yet sufficiently structured and systematized to ensure the comparability of information over time and across regions; and
- \* Participatory, involving local people, technical extension staff, NGOs, grassroots organizations, farmer associations, donor agencies, and other concerned individuals and institutions. Broad participation helps ensure the consideration of indigenous knowledge and external technical expertise, ownership of plans, accountability, and involvement in implementation.

For purposes of presentation, the following discussion of sub-county EPI is divided by activities into three sections -- information collection (including monitoring/evaluation), environmental planning, and implementation. The actions to

accomplish each effort are, however, inter-woven, inter-related, and over-lapping. The following sections include brief overviews of some tools, means, and procedures for a proposed EPI methodology. Together they outline a preliminary framework for a sub-county EPI methodology. The presented methodology would no doubt benefit from an iterative development process of design, field-testing (possibly in the NEAP pilot districts), and refinement.

Information Collection. Much of the information necessary for effective EPI and monitoring/evaluation is collected by local government and known by sub-county authorities. For example, government ministries and departments request that sub-counties submit multiple data sets and reports to the district. Some of this information is (should be) collected by parish, sub-parish, and community authorities, other data is collected and organized by sub-county authorities. Only a small fraction of the information, however, is recorded, analyzed, and shared with authorities outside the sub-county due, in part, to difficulties in transportation, communication, and budgetary provisions.

The following data are requested by government from the sub-county (Turyatunga, 1990):

Monthly

- \* Revenue collection
- \* Number of patients
- \* Immuni status

Quarterly

- \* Agricultural produce (perennial crops)
- \* Government marketing strategies
- \* Government subsidies
- \* Availability of food

Annually

- \* Number of tax payers
- \* Schools and school going children
- \* Cultivated land (agricultural area)
- \* Tax assessment data (local wealth)
- \* Population
- \* Economic output
- \* Number of AIDS victims
- \* Number of ranches
- \* Trading traffic (business records)

5-Year Updates

- \* General land use/land cover
- \* Protected areas, including wetlands
- \* State of forests/woodlands
- \* Livestock population
- \* Area of the sub-county
- \* Rainfall seasons
- \* Roads
- \* Developed farms

Sub-county authorities recognize that certain information is required for effective planning, and, according to one field survey (Turyatunga, 1990), are willing to spend 10 percent of their funds on data gathering and analysis (including employing assistants to undertake these activities if the necessary facilities would be available). At present, however, most sub-county offices lack the equipment, stationary, and other facilities to handle and store the data.

If the data sets already requested by government would be accurately collected, recorded, and analyzed, they would provide important baseline information for EPI. On some issues, more detailed information would need to be collected, and in most cases, the information would need to be collected more frequently. For example, most of the resource-specific information (land use, forests, wetlands, rainfall, etc.) is now only requested once every five years. Agreed upon sets of data should be collected and recorded in standardized formats at regular intervals to capture seasonal changes and variability (perhaps twice each year), with options for additional, more detailed site-specific information. The formats should be consistent across sub-counties and over time to allow for data comparison.

Because of their proximity to the grassroots, much of this information is known to the sub-county agriculture assistant, veterinary assistant, and forest ranger. As a result, the information gathering effort is, in fact, primarily an information recording exercise which can be conducted primarily at the sub-county headquarters (while the information flow between communities and sub-counties may be sufficient in some cases, that between sub-counties and districts needs significant improvement.).

These same data sets can provide much of the information to measure people-level impacts for monitoring local resource management practices and evaluating project performance. For some projects, specific indicators will need to be monitored to measure performance (i.e., biodiversity conservation) which will require that additional information be collected (i.e., wildlife populations). The collection and analysis of this new information should be the responsibility of the project staff (or the relevant government institution), but shared with the sub-county officials. Only if the new information becomes critical to local government policy/by-law objectives and actions, should it become a sub-

county responsibility.

Environmental Planning. The planning process involves several actions, including data review/analysis, problem identification and prioritization, the identification of alternative options to address the priority problems, the selection of best options, and the development of detailed action plans to implement the selected options. Sustainable development/environmental plans should be prepared or updated every 1-3 years.

The planning process should be participatory to help ensure the plans are appropriate (socially, culturally, economically, technically, ecologically, politically acceptable), and to foster some sense of ownership (important in facilitating local involvement). In addition to the sub-county planning committee (chief, RC executives, sub-county extension staff), the EPI team should involve representatives (perhaps one RC1 member) from each of the 8-9 sub-county communities, relevant technical expertise not available at the sub-county level (probably from the county), as well as individuals from concerned NGOs, PVOs, grassroots organizations, farmer associations, and donor agencies. Ideally, the planning group should total no more than 20-25 individuals; larger groups have difficulty agreeing on issues and reaching consensus.

The full EPI planning group should convene to prepare the development/environmental action plan, perhaps in an office at the sub-county headquarters. Some sub-counties are small enough so that travel by community representatives to a central location is not difficult; transportation will have to be arranged for villagers in larger sub-counties. If well organized, the entire planning process can be completed in 1-3 days. The DEO can play a critical role in organizing and perhaps facilitating the planning sessions. For example, he/she can meet the sub-county planning committee in advance of the planning sessions to guide the committee on effective data presentation, and to share conflict resolution and consensus building techniques.

To facilitate data review and analysis, the relevant information should be presented in formats suitable for easy interpretation and quick analysis. These might include maps, tables, figures, charts, diagrams, and other visual formats. Because of community-level involvement in this process, many of the proven PRA tools should be considered, including:

- \* Resource maps
- \* Transects
- \* Farm sketches
- \* Operational sketches of on-going resource management practices (irrigation, terracing)
- \* Seasonal agricultural calendars (12 months)
- \* Time trends (30-50 year periods)

- \* Historical time lines (the last 100-150 years)
- \* Matrixes (for relative comparisons)
- \* Production cycle flowcharts
- \* Venn diagrams (institutional analysis)

Multiple tools are also available for prioritizing problems, selecting appropriate actions, and developing detailed action plans. Tools should be selected which help ensure that the decision-making process is democratic and not dominated by certain individuals with special interests, that the plan benefits from both indigenous knowledge and external technical expertise, and that the options/actions are acceptable to all or most members of the EPI planning group.

Implementation. Implementing the agreed upon set of actions requires that the necessary resources are secured (financial, materials, etc.) and that the local labor and technical expertise are mobilized in timely fashion. To facilitate implementation, the development/environmental plans should be as comprehensive and specific as possible. They should also include actions that can be realistically accomplished or furthered within the planning cycle (i.e., the resources are/are likely to be made available). For example, the plans should include precise time schedules, accurate lists of required resources (and quantities), and responsible individuals/institutions should be designated. Each action should also include a contact person from the community in which the effort will be undertaken as well as a relevant sub-county official (i.e., agricultural assistant) to coordinate actions outside the target community.

Most local communities have limited financial and other resources for development and environmental management purposes. Well-designed actions will emphasize locally available material resources and minimize costly external inputs. Should funds be necessary to purchase important resources (or hire critical technical expertise), the most likely sources include limited community contributions, sub-county coffers, and the international development assistance community. Eventually, the sub-county should provide the bulk of the resources (see below), although initially the actions could be supported by external donors (i.e., GMU, PVO-NGO/NRMS, Africa 2000 Network, etc.) with at least token contributions from the targeted community and sub-county.

Each RC Executive Committee at every level includes a Secretary for Mass Mobilization and Education whose responsibilities include mobilizing local labor for development/environment purposes. In addition, most communities have some traditional means of mobilizing local labor (i.e., short-term agricultural work groups which rotate to the farms of the group members, communal labor for community development/crisis management). Given sufficient time, the village leadership should be able to mobilize sufficient local labor. It is important, however, that the labor needed to

construct, maintain, and manage the development/environmental effort does not conflict with peak agricultural and other economically important activity labor periods.

Evidence suggests that the technical expertise needed for most appropriate local development/environmental management activities already exists in the community or at the sub-county. Communities possess a wealth of indigenous knowledge and most sub-counties include some technical expertise in agriculture, animal husbandry (veterinary), and health sufficient. Although the formal training given to assistants may be narrow in scope, their experiences, knowledge, and understanding of local conditions and resource management are often quite broad -- most assistants are local residents. Alternatively, the full compliment of technical extension officers is located at the county level. Their assistance should be solicited by the sub-county authorities when necessary. Preferably, their services would be partially paid for by the sub-county. The pay -- on top of their government salaries -- would act as an incentive for county/district extension officers to work at the village level. In so doing, they would also be accountable to the sub-county for their contracted tasks.

#### VI. Community EPI

In some cases, certain communities or village-clusters might need to be targeted for more intensive and comprehensive development and EPI. For example, a community which has been relocated or which has lost access to critical land and natural resources (i.e., as a result of the gazetting of a new protected area of status) might need considerable assistance to reestablish itself. For such communities, it would not be appropriate for the sub-county to be responsible for all development/environment actions (A focus on one or a few targeted communities would be at the expense of actions in other sub-county villages.). Rather, the county, district, or central government should work with the sub-county planning committee and the RC1 Executive Committee to prepare community development/environmental action plans for the targeted village. Several effective methodologies (D&D, PRA, RRA, etc.) have been developed and are available which enable extension officers to work with local people at the village level to plan and implement development and resource management actions. The coordination and implementation of such efforts could be, in part, the responsibility of the DEO.

#### VII. Options and Recommendations

Undertaking effective sub-county EPI and, when necessary, community EPI, in the decentralized/NEAP pilot districts and within the context of the current socio-economic and political conditions will require some actions on the part of the GOU, in particular, the

MWEMEP's Department of Environment and the NEAP Secretariat. To facilitate sub-county EPI throughout Uganda will require more fundamental changes in government, particularly in its decentralization program. These two levels of recommendations will be discussed separately.

### Immediate Policy Changes

Political Support for Sub-County EPI. The primary recommendation of this report is that the sub-county is the most appropriate administrative level for EPI. To legitimize sub-county EPI, The GOU, perhaps through the MWEMEP, should make a policy statement outlining this new directive. It should also make explicit the new roles and responsibilities of the involved institutions. In so doing, other government ministries/departments, local government, development agencies, as well as NGOs, grassroots organizations, and local people will be made aware of the GOU's intentions and commitment to devolute development/environment power and responsibilities. Political legitimacy often translates into broad participation and local involvement.

Strengthen Sub-County Environmental Information Management. Minimum data sets for effective environmental planning, monitoring, and evaluation must be identified, and the information collecting, reporting, and analysis procedures agreed upon. Sub-county planning committees should be introduced and trained in these formats -- principally by the DEOs with NEMA assistance -- and provided the necessary time and resources to record the information. The facilities to handle and store the information at the sub-county must be introduced.

Strengthen Sub-County/Community Environmental Planning. An effective sub-county EPI methodology must be developed, field-tested, refined, and shared with the sub-county planning committees and the DEOs. The EPI method must be quick, simple, inexpensive, participatory, and transparent; the development/environmental plans must address community priorities and be locally appropriate; and the sub-county must be accountable to its constituency. In addition, one or more of the many effective community EPI methodologies should be shared with the DEOs. DEOs should be responsible for working with the sub-county planning committees to organize and facilitate development/environmental planning (although DEOs should not be held accountable for micro-managing all activities in each of their district's sub-counties.). DEOs and DECs should also help facilitate the approval of sub-county development/environmental plans by the district authorities.

Financial Support for Sub-County EPI. Sub-counties should not be responsible for the financial costs of developing and training the EPI methodology, although they should contribute (token financial or in-kind) to all development/environment activities which are initiated in their sub-county as a result of the EPI. None of the

immediate financial costs associated with these activities -- especially those in the decentralization/NEAP pilot districts -- should be borne by the MWEMEP's Department of Environment and NEAP Secretariat (or the parent district if financial decentralization is realized). Additional resources could come from USAID's APE (i.e., GMU); NGOs, PVOs, and donor agencies working in the NEAP pilot districts can also be asked to support certain actions.

Technical Expertise. The technical expertise to develop the sub-county EPI methodology, and to train DEOs and sub-county planning committees in both the sub-county and community EPI methodologies can come from a variety of local sources. The design, field-testing, and refinement of an effective sub-county EPI methodology should be led by a local training institution (eg. IENR, MISR), perhaps in collaboration with an international organization with expertise in local development/environmental planning (eg. WRI). Individuals and institutions in Uganda (as well as Kenya) have expertise in PRA and similar community EPI methodologies (as do a host of international organizations, including WRI, Clark University, IIED, etc.). Technical expertise to implement the development/environmental plans should come first from the targeted communities and sub-county extension staff, and second from the county or district level, including the DEO.

#### Long-Term Policy Reform

Technical Expertise at the Sub-County. Eventually, the full compliment of technical extension officers, including environmental officers, currently available at the county/district level should be decentralized to the sub-county. Such expertise would facilitate the EPI processes both at the sub-county and community levels. Considerable education and training of extension staff would be needed to achieve this objective.

Financial decentralization. If sub-counties become the principal EPI level, they must have access to more government revenues if they are to be effective. Multiple options exist for increasing sub-county resources, including retaining a larger share of the graduated tax, raising the graduated tax (most likely the top-end), expanding the current tax base, receiving block grants from the district or directly from central government, and/or initiating other income-generating actions. Special allotments can also be made to particularly poor sub-counties. In addition, donors can be allowed and encouraged to work directly with sub-county governments. As sub-county revenues increase it will be important to ensure local governments remain effective, efficient, transparent, and accountable to their constituencies.

Political Authority to Establish By-Laws. To enable sub-counties to meet their responsibilities, they should be given the political authority to establish by-laws. And to ensure a quick approval process, sub-county by-laws should be reviewed and authorized by

district authorities, rather than central government. Such devolution of political authority, however, must involve the placing of qualified attorneys at the sub-county.

Multiple Sub-County EPI. On the one hand, most EPI methodologies which are responsive to community needs and priorities, allow for direct village-level participation. On the other, planning sessions involving more than 30 people have difficulty making decisions and reaching consensus. Preparing one EPI for two adjacent sub-counties would still keep the joint planning group to a manageable size (assuming the planning group includes only one representative from each of the 16-18 communities). The EPIs of adjacent sub-counties with similar social, cultural, political, economic, and physical characteristics would be the most feasible.

#### VIII. Conclusions

This report argues that, given present socio-economic and political realities, the most preferred administrative level below the district for EPI is the sub-county. It presents a framework for a proposed EPI methodology which is simple, quick, and inexpensive. Effective sub-county EPI, as proposed in this report, requires that the on-going and intended government decentralization efforts are implemented as planned. It recognizes that these efforts may require several years to be realized, and, as a result, sub-county EPI efforts may not be launched until this time. WRI is prepared to further assist USAID-Kampala in planning for sub-district EPI, developing a sub-county EPI methodology, and/or developing a training program in sub-county/community EPI methodologies.

## List of Contacts (Institutions)

### Government Institutions

Ministry of Local Government  
Department of Planning  
Decentralization Secretariat

Ministry of Finance, Planning and Economic Development

Ministry of Water, Energy, Minerals and Environment Protection  
NEAP Secretariat  
Department of Forestry  
Department of Environment

Makerere University  
Institute of Environment and Natural Resources  
Makerere Institute of Social Research  
Faculty of Law

### Non-Governmental Organizations

DENIVA  
JEEP  
Women's Tree Planting Association  
Kigulu Development Group  
Jinja Construction and Joinery, Ltd.

### International Agencies

USAID/Contractors and Consultants  
Mission  
TR&D  
EIA  
WRI

IUCN  
World Learning - PVO/NGO-NRMS Project  
Land Tenure Center, Wisconsin  
London School of Economics, UK  
York University, Canada