

A CALL FOR SEA: INADEQUATE ASSESSMENT OF THE INTERNATIONALIZATION PLAN FOR RIBEIRÃO PRETO AIRPORT, BRAZIL

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Abstract

The present paper discusses the case of the Internationalization Plan for Ribeirão Preto Airport (in southeastern Brazil) which was assessed through a project EIA process. This Airport Internationalization Plan, part of the Government's transport strategy, conflicts with the Ribeirão Preto city urban plan and generates impacts not considered in the project EIA process. Project EIA is not considered to be the appropriate tool for such an assessment, but SEA is not currently required under the Brazilian system. The conclusion is that project EIA is being used to give more answers than it is intended to give, making the instrument less reliable. On the other hand, SEA could be introduced into the Brazilian system to fill the gap in the impact assessment of higher level decisions, taking horizontal links and the tiering processes into account.

Key-words: SEA, project EIA, airport

Introduction

The construction of an airport is always a challenging task and, in a dense urban area or in districts where there are few open spaces left, the interests and conflicts are even stronger. Ribeirão Preto is a developing regional centre and it was chosen to be part of the state transport development strategy of São Paulo State Government. The increased demand for air transport is responded to in this Plan by developing international facilities at Ribeirão Preto Airport. The proposal is presented as a State Government initiative, and implemented by its specific aviation department (DAESP). The existing passenger airport, upgraded seven years ago to meet the requirements of a custom service connection to Viracopos Airport (200 km from Ribeirão Preto), is now under a development process in line with government initiatives.

The only mandatory impact assessment tool used in Brazil is one focused on projects and this leads to fragmented and disconnected project assessments when decisions need to be made at other levels, such as plans and programs. The inconsistency can be verified in several projects where EIA procedures have been used, leading to weak and questionable decisions. The absence of any technical and social criteria to justify the choice of site and therefore the identification and assessment of impacts, mitigation measures and monitoring requirements, are examples commonly seen in the process. Environmental constraints or concerns within urban, regional and social realities are rarely considered and this is also seen to be the case in Ribeirão Preto, as discussed below.

Although project EIA leads to improvement of projects with tangible benefits for socioeconomic development towards sustainability (Wood, 2003), it does not cover cumulative and synergistic environmental impacts of multiple developments, and often fails to adequately evaluate alternative development scenarios (Noble, 2000; Partidário and Clark, 2000). It is also usual to see project EIA take place before strategic planning decisions, causing irreversible and conflicting decisions in relation to the environment (Partidário and Clark, 2000). Where this is the case, no room is left for links to or

identification of sustainable development alternatives which makes the use of an instrument such as SEA essential to cover these aspects.

SEA needs to come at early stages in the planning process (Fisher, 2003; Noble, 2000; Dalal-Clayton and Sadler, 1999) to improve and facilitate decision making with a tool that fulfills requirements for sustainable development at higher levels of decision-making, leaving project EIA for specific actions.

It is important to mention that SEA must be adjusted to multiple interpretations and to all forms of decision-making and planning rationalities; it must be focused on principles and goals to achieve sustainable development, rather than on specified process requirements or just one form (Partidário and Clark, 2000). In an ideal process, it should be normal for project EIA to take place after planning decisions have been taken at a strategic level.

SEAs and project EIAs can be efficiently used in a tiered system and the outcome at the SEA level may not require deeper explanation at the project EIA level. The importance of this tiering notion is hardly considered and discussed critically in applied situations (Tomlinson and Fry, 2002). As an environmental support tool for decision-making, SEA should not get drawn into any 'balancing/off-setting' process or judgment. Therefore SEA should remain focused on targets, function, goals and outcomes: identifying and reporting impacts, suggesting ways to avoid or reconcile conflicts, and making a special effort to consider cumulative, indirect and long-term impacts (Therivel 2004).

There are still concerns and weaknesses in SEA as an environmental tool and as part of the impact assessment tools group. In practice, the main challenge and target of SEA is to guarantee, at the end of the decision-making process, that there are environmental gains for the whole community instead of merely reporting a net loss situation or a 'validation' of a process in which economic gains have been used to neutralizing environmental or social adverse impacts.

The case of the International Plan of a regional airport shows how SEA could enhance project EIA by looking more widely at major impacts, together with mitigation and monitoring measures, whereas in the case as it unfolded some of these were treated merely as amendments to an existing project EIA.

The context and the process

The Ribeirão Preto region has a great potential as a location for an International Airport and the members of the State Government Development Strategy team support its implementation through the Aviation State Department (DAESP), in charge of the EIA process and report.

The present passenger airport is located in an urban area with both industries and houses and no space to expand. The 1995 Ribeirão Preto City Plan (PDM, 1995) suggested the transfer of the airport away from the urban area. Nevertheless, after that time, the airport's surroundings began to be occupied by other uses and the recommendation for the moving of the existing airport was ignored.

The State government, which is responsible for the airport's management, allowed in 2003 a private company to expand airport services with a custom service connection to Viracopos Airport in the district of Campinas. This expansion of service had very low implications on the city infrastructure or on city services. To prevent future expansion of area in an already heavily occupied zone with existing conflicts, an agreement had been signed previously by the district attorney and the company to clearly ratify only the new custom service in the existing area.

After this service agreement the State government, as the airport manager, included the Internationalization Plan for Ribeirão Preto Airport in its development strategy without considering the limitations and constraints posed by the city's urban plan, which means bring international cargo aircrafts to the city, larger aircrafts requiring expanded runway (from 2100m to 3800m) and night flights in a region that, after the 1995 City Plan, became densely occupied by residences and services. The company "Grom Acústica & Automação" made a noise model – 2006 - and concluded that the aircraft operation considering the internationalization is incompatible with the present land use.

The public hearing, foresee in the Brazilian project EIA procedures, were applied by the DAESP consultants with the stated purpose of reviewing the Internationalization Plan and to assess its effects on the environment, reviewing at the same time about conflicts with houses and services, transportation plan and the enlargement of internal and external airport services and structures. Most of the considerations, which were economic in nature, did not fit either project EIA nor a SEA and the tool was used only in a limited way to show that the items of the EIA procedures had been accomplished.

This project EIA public hearing route became the only way to discuss the environmental, social and economical impacts and to improve the sustainable values of the planned changes to the airport. It must be highlighted that, in this case, these public participation session was essential relevant to support the State Department of Environmental Impact Assessment, the state technical support agency, and the final decision taken by the Environmental State Council, denied the EIA report and the Internationalization Plan unless the amendments recommended by the hearing could cover it all.

The project EIA report

Project EIA is a formal requirement established by the Brazilian National Environmental Policy (Law no. 6938/81) and the Federal Constitution. It includes comparison of project alternatives, evaluation of impacts and public consultation before a decision is made, considering the environmental acceptability of the proposed actions. The Internationalization Plan for Ribeirão Preto Airport (DAESP, 2005) was developed under a project EIA approach, which has meant that the questions which need to be asked at the planning level were kept apart from the main assessment made. Project EIA usually offers misleading answers to these kind of questions and provides very little (or no) support for strategic decisions. However, the Airport expansion had been justified as a Plan and not as a project, therefore should be treated like one. It did not have a fully detailed project to be assessed, just some broad views. On the other hand, during public hearings, in 2006 and 2007, the DAESP consultants responsible for the environmental report stated that their focus was on the airport expansion and that there was no need to link their project to other plans such as the city's urban plan, or to transport or other services.

The main source of conflict in this case is that the project stakeholders assumed that the Internationalization Plan would be applied, **necessarily**, to the existing Ribeirão Preto airport, and therefore no alternative site would need to be chosen, studied or justified.

The environmental impacts assessment process followed all legal procedures and, showed what a chronic weakness of Brazilian EIA system is: too much unnecessary information was provided but there was an absence of useful and important data. The focus of the statements was clearly not environmental but economic, with objectives and targets not linked to basic criteria and not reporting on alternatives considered. As a

consequence, the impact evaluation had very little influence on the actions described and on the implementation decision

The existing airport is located in a dense urban area; this means greater conflict with the Internationalization Plan and highlights the need for a well-balanced decision which considers development requirements, as well as social and environmental values. Given the dense occupation of the district, an array of negative or conflicting impacts can be seen, and these have usually been neglected in most situations described in the EIA report.

Alternatives to the Internationalization Plan (e.g. location) were not identified, assessed and compared because the environmental report justifies the Internationalization Plan merely as an enlargement of the existing Ribeirão Preto airport. The report considers the positive economic impact of this enlargement to exceed any other considerations for all alternatives which might come forward. Thus, the discussion was used only to fulfill the reporting requirements. All existing infrastructure for planes and passengers, including parking areas, fuel and maintenance depots etc. were described as positive impacts in that they exist. Then in the following section of the proposal they were shown as having a negative impact, i.e. cost, in that if a new airport were to be built elsewhere, these would be added costs. Thus, with all economic aspects initially described as positive impacts at the existing airport but converted to negative impacts to all other alternatives this led to the idea that airport enlargement on the same site 'had no cost', and that all other impacts are less important. The report consequently concluded that no other feasible site in the city district could exceed or even match the positive economic impacts of the existing airport site.

No links or references were made in the EIA report to the Ribeirão Preto city urban plan then in force, even the new one (which was in process of approval), nor to other plans: the transport plan, the mobility plan nor even the land use 1995 Plan in which it was specifically recommended that the airport would move out of the urban area. Two important impacts are shown below to exemplify the case.

First, at present the continuing operation of the airport is dependent on an agreement to transfer local residents, in view of the noise impact on the population within the noise influence zone (Figure 1). To the municipality, the Internationalization Plan for the Ribeirão Preto Airport, which is a State government strategic investment, is a good approach to solving the problems of existing slums in the surrounding area and, at the same time, bringing investments to the whole city. The impact of the transfer of residents was assessed only in terms of compensation for houses values. The losses in living standards, public and private services and mobility were not considered as impacts.

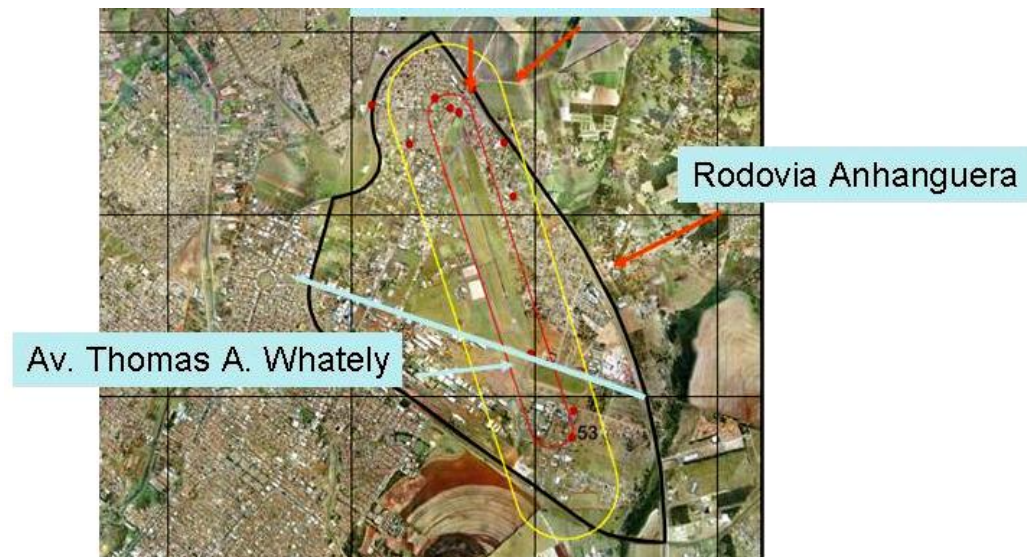


Figure 1 – Noise impact zones (level 1 curve – in red, and level 2 curve in yellow). To maintain the airport at this site, with or without the new plan, local residents need to be transferred because they are in the Area Directly Affected (ADA) in black. Source: Environmental Impact Statement (DAESP, 2005)

Secondly, the obstruction and diversion of one of the city's main avenues is not mentioned in the report as an impact (Figure 2). This diversion is introduced to extend the runway to the required length. The Avenue Thomas A. Whately is shown diverted around the airfield (from 800m to 3700m and the project does not mention its cost). At present the existing road system has straight and good avenue access with heavy cargo traffic from the Rodovia Anhanguera, interstate highway, to the airport custom service in question and is one of the main entrance routes for the whole city cargo as well. Added to this questionable traffic flow solution it has to be considered that the avenue provides the only access of some densely populated city districts to the city centre. The new road design will lead to a zone of conflicts, with much more than just transport problems, but also safety problems for pedestrians, bicycles and motor vehicles; for example the darkness area along the avenue, as required by the aviation department for night flights operations, will be enlarged.



Figure 2 – Representation of the main avenue (in yellow) today, connecting the highway and some city districts. The proposed diversion is shown in red. The diversion shows no links with the existing road system. Source: Environmental Impact Statement (DAESP, 2005)

The State Government's strategies have no link with the Ribeirão Preto city urban plan. The current land use plan still shows the airport as moving out of the urban area; this proposed move is neglected by the new proposal and not discussed as an alternative. The mitigation given by the State Government goes only as far as the population transfer required by district attorney. The land use change which may be induced by the Internationalization Plan is not mentioned in connection with today's urban plan, but is seen only as a positive development impact in the report.

Conclusion

It would be appropriate to evaluate the Internationalization Plan for Ribeirão Preto Airport under an SEA process and not a project EIA process, even though SEA is not mandatory under the Brazilian planning and legal system. There are conflicting interests and critical issues at the boundaries between today's airport and its surroundings. These include the likelihood that the expanded airport will further induce urban sprawl – this has not been considered in this case as a potential impact. Through the use of public participation, some wider topics can occasionally be included in an assessment. If an SEA process is applied, the interaction with other plans would lead to the identification of alternative options for decision makers and would provide more detailed information which could be taken forward to lower stages of the decision chain (i.e. project EIA). In this sense, the tiering process can occur based on wider sustainable criteria without losing its strategic focus on the city's urban plans as a whole.

The proponent's refusal to provide criteria, to review other alternatives, or make other necessary connections makes it more difficult to improve the process and so it provides less benefit to the community as a whole than it could. The public hearing gave the local residents a chance of showing to the private technical experts, who are responsible for achieving project EIA approval, the inconsistencies in the Plan and to demonstrate concerns about impacts upon quality of life.

Inconsistencies have been identified in the assessment process through a process of public hearings. It would be possible to increase commitment to the achievement of more sustainable goals with respect to both technical and social matters. In this case, all the inconsistencies were addressed as amendments to be answered by the project EIA process. An improved project EIA is needed, but; nevertheless in the meantime, project EIA is enlarging its function in the absence of SEA.

The conclusion drawn here is that the project EIA is being used to provide answers beyond its remit and capacity and this, in practice, makes the process less reliable. At the same time, this process and this particular example makes clear that SEA is the right tool to achieve better answers on impact assessment of plans, making the connections across horizontal levels. With an existing SEA in place, the subsequent project EIA would be able to be more detailed and searching, and this would strengthen future decisions.

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