

## **Cumulative Impact Assessment**

**November 6 -9, 2008**

**Calgary, Alberta. Canada**

**By**

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### Paper

Review and comparison of legal frameworks, guidance documents and procedures for CEA from the USA, Canada, European Commission, other leading countries, and the international lending institutions and aid agencies.

### Topic

The potential role of Cumulative Environmental Assessment Practices in re-engineering institutional and legal Frameworks and policies for managing Sustainable Economic Development. The case of small island developing states in the Caribbean- Trinidad and Tobago.

### Abstract

This paper explores the challenge of practicing Cumulative Environmental Assessments (CEA) in the context of weak institutional and legal frameworks and policies governing Environmental Impact Assessments (EIA). This paper describes the role of EIAs in the Development Approval process in Trinidad and Tobago. The weaknesses of the current framework are explored, and the leading role the ethical and professional CEA specialist, can play in environmental policy.

### Introduction

Trinidad and Tobago is the most industrialized and perhaps the most urbanized of the Caribbean chain of islands. The country is small and rich in natural resources. The crude oil and natural gas sectors dominate the economy and there are important linkages with the country's heavy industries such as ammonia, methanol, iron and steel, and soon, a series of aluminum smelting plants.

How have we managed our development? Early Planning Law in Trinidad and Tobago was modeled on English planning law at the turn of the 1890s. The current legislation, The Town and Country Planning Act, was adopted in the 1960s. In this legislation, it is the Minister with responsibility for Planning, who

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makes physical planning decisions. This legislation was fashioned in the era of the Master Plan. In that era, the planner and by extension the Minister of Planning was purported to know and to act in the public's interest. Hence, there was very little public involvement in the decision making process.

The Town and Country Planning Division (T&CPD) was established to administer the provisions of the Town and Country Planning Act. It operated within the public service, under public service regulations and acted very much like the alter ego of the Minister.

### Physical Planning-Post Independence

In the 1960s, careful planning was seen as the prudent way to move the country forward. The country had gained independence from Great Britain and was now on an ambitious path to industrialization. Trinidad and Tobago has a long history of crude oil exploration and discoveries spanning over 100 years. By the 1970s, the crude oil industry was highly developed and the sector was very well poised for positive market changes. Therefore the problems in the Middle East in the early 1970s resulted in unexpected and windfall gains in the Trinidad and Tobago's National Income through escalation of crude oil prices. With the country's Treasury now overflowing, it was felt then, that finance would not be a problem for catapulting the country into a more developed one.

Many ambitious industrial projects were formulated at the highest political level. However, given the political nature with which decisions were made, physical planning soon lost its mystique and was quickly replaced by "Sectoral Strategies"- We simply did away with planning and oversight in the development approval process. This occurred during the 1970s and mid 1980s and resulted in the implementation of large scale heavy industrialization projects accompanied with rapid urbanization.

Interestingly, the large increases in urbanization and industrialization occurred at a time when there was no official overarching National Physical Development Plan. The said plan was finally enacted in Parliament in 1984, at a time of waning construction and urbanization. In short, we resumed planning after we had completed our development projects.

Coincidentally, there was international debate at that time on the process of urbanization and the role of cities in the developing world. The premise at that time in the developed world was that there were potential problems with Over-urbanization and Primate Cities. This was eloquently espoused as fact at the 1<sup>st</sup> United Nations Habitat Conference in Vancouver in the 1970s. History has shown that this was in fact a myth. Current evidence suggests that one needs to encourage urbanization and to make cities more efficient, rather than constrain their growth.

Trinidad and Tobago is one of those country's where these untested United Nations' advocated policies were implemented with disastrous results. The separation of places of work from residences and the virtual gutting of urban areas, led to sub-urbanization, and the exacerbation of preexisting urban problems. For the large industrial projects, these were implemented without the benefit of environmental oversight. One of the legacies of these decisions is that the pattern of physical development was irrelevant to sustainable development. In hindsight, a Cumulative Environmental Assessment of these plans would have revealed all these problems.

### Relevance of Physical Planning

While the Town and Country Planning Division (T&CPD) and indeed the need for planning were largely ignored after the 1970s, the Division continued to exist as part of the public sector machinery. More than 20 plans were prepared without the benefit of effective public participation and consultation and there was generally no political support in the process. The result was that only about three (3) plans were approved over the entire history or existence of the Division.

From the late 1980s, with the resumption of planning and until 1995, the Town and Country Planning Division (T&CPD) made all decisions related to development approval. The Division also acted as the coordinating arm of all the Statutory Approval Agencies. The vast plethora of environmental agencies such as the Forestry Division, The Water and Sewerage Authority; and Land and Surveys Division have specific functions and roles to play in the management of the environment. But there was no consistency in environmental and urban policy. In the late 1990s, a Minister of Planning lamented that over 80% of the built development in Trinidad and Tobago was unauthorized. This was clearly a matter for concern.

### New Environmental Legislation

In the 1990s, under World Bank Loan conditionality, the country was asked to enact new legislation which would lead to better management of the Environment. It should be noted that prior to this, the T&CPD was the only agency that provided environmental oversight at the approval stage. Moreover, continued monitoring of the environment was never followed up in any meaningful manner.

In 1995, new environmental legislation was passed in Parliament. However, implementation and legislative issues soon arose. Five (5) years after in the year 2000, efforts were made to address this issue. The legislation was amended in 2000 after the repeal of the 1995 legislation and the introduction of new legislation. The current agency that has assumed coordinating role on environmental issues is the Environmental Management Authority (EMA). However, this agency operates outside of the normal public sector regulations and bureaucracy.

Many new problems have since arisen or have become evident. There are now over 100 pieces of legislation and over 50 Public sector departments or institutions that oversee the natural environment in Trinidad and Tobago. Many of these institutions operate under public sector regulations and bureaucracy. It is therefore a monumental and heroic task to coordinate all of these agencies by one (the EMA) that operates outside of public sector regulations.

### Weaknesses in Physical Planning

After the construction boom between the 1970s and 1980s, the Director of Town and Country Planning Division, and indeed the public sector bureaucracy, made planning decisions on behalf of the Minister. Indeed, much of the applications were related to housing and small business, change of use, sub-divisions or severances. The interesting thing is that many physical planning applications were denied. Upon a challenge of the decision- through the Town Planning Advisory Board (a panel of experts

appointed to directly advise the Minister), many of those decisions were reversed by the Minister. This did not encourage or engender a sense of enthusiasm within the Division. To this day, there is still a history of distrust between the bureaucratic machinery of the public service and the politicians.

At the heart of the debate is the cynical fear by the public service that the Minister with responsibility for Planning, should not have the prescribed authority as exists in law. This means that the public service does not support the fact that the process of planning is a political one, and one backed by accountability. The public service would actually prefer that they, the public servants make the decision while at the same time assuming no accountability for their actions.

#### Weakness in Environmental Management

As a consequence of the Environmental Legislation of the year 2000, additional rules were established in law, under subsidiary legislation governing environmental oversight. These rules came into effect in July 2001. Thereafter, all applications for physical development needed to be screened to determine whether the proposed development activity could have serious environmental impacts or could impact on human health. For this reason, a Certificate of Environmental Clearance (CEC) was required and was prescribed under legislation.

Under the 2000 legislation, the meaning of “environment” assumed a specific legal meaning referring to elements of the physical and ecological environment. The socio-economic environment was excluded from this definition. This means that in the formative years of the EMA, issues of a Socio-Economic nature were excluded from important decisions.

To facilitate the process of screening projects, a check list of activities (Designated Activities) was formulated and introduced into law as subsidiary legislation, as aforementioned. Interestingly, these were the triggers and thresholds established for assessing environmental issues. These are equivalent to an a priori but narrow spectrum of Valued Environmental Components, that were absent of sociological and economic issues. These were used to determine whether a CEC could be granted.

The conditions for a CEC were initially associated with the actual construction activity and the size of the activity- This means that approximately eight (8) years ago, environmental oversight for development projects was primarily Project oriented and focused on ecosystem and the natural environment. To illustrate, the following examples describe selected Designated Activities and the triggers and thresholds associated with these activities.

For example, under Designated Activity #1- **Poultry, Pig, Cattle and other Animal Husbandry and Production**, the triggers and thresholds were as follows:

- (a) The establishment, modification, expansion, decommissioning or abandonment (inclusive of associated works) of a poultry, cattle, pig or other livestock farm in excess of 250 heads of poultry or 25 heads of cattle, 25 heads of pigs or 25 heads of other livestock.
- (b) The establishment, modification, expansion, decommissioning or abandonment of a facility for the hatching, breeding or slaughtering of 250 heads of poultry, or 25 heads of cattle, 25 heads of pigs or 25 heads of other livestock, per year.

Activity #8-**Clearing, excavation, grading and land filling**, the triggers and thresholds were as follows:

- (a) The clearing, excavation, grading or land filling of an area of more than 2 hectares during a two year period.
- (b) The clearing of more than one half a hectare of a forested area during a two year period.
- (c) The clearing, excavation, grading or land filling of an area with a gradient of 1:4 or more

Final example- Activity #25- **Establishment of a Facility for Primary or Secondary Production of Crude Oil, Condensate or Associated Gas**, the trigger (but no threshold) for assessing the environment and to obtain environmental clearance was as follows:

- (a) The establishment, modification, expansion, decommissioning or abandonment (inclusive of associated works) of a facility for the extraction or production of crude oil or production of associated gas or condensates.

It should be noted that at this stage there is practically no public involvement in the process. In addition, certain activities, such as quarrying or mining below a certain acreage, and all housing projects regardless of size, did not require a CEC. The rationale was that the process of environmental oversight would restrict development.

Another interesting feature was the lack of Cumulative Environmental Assessment at the Strategic Level. Even though the term is included in the Terms of Reference for an EIA, it appears to be an afterthought or a string of jargon with no relevance to the legislation, actual procedures and process. This means that all existing activities were not considered as well as the effects of individual activities which did not exceed the thresholds established by the triggers. Ignoring the existing activities, there was no assessment of for example, the impact of a series of new small farms, or clearing and excavation of land for new small projects. This is a worrisome prospect for good environmental assessment. As professionals, any Environmental Impact Assessment must address Ecological, Social and Economic Issues and the Assessment must be made in the context of Cumulative Environmental Assessment and Management (CEAM).

To put this in perspective for our profession, this means that for certain Designated Activities, the construction activities are the triggers for assessing environmental effects and impacts, these are equivalent to the “Valued Environmental Components, VECs” as aforementioned. However, this range or scope of the VECs that the EMA deems important in environmental oversight is very myopic and focused only on the project itself and the ecosystem. Clearly, there is a serious legislative deficiency here that should be addressed.

Once the Certificate of Environmental Clearance, (CEC) has been granted or there is indication that there are no serious environmental issues, the application moves to the next stage- Physical Planning approval, under the jurisdiction of the Town and Country Planning Division. If, however, a CEC is required, the EMA may make a decision based on the triggers and whether or not, more information is required for a decision to be made. This may be in the form of additional information related to the Designated Activities. This means that projects that can have significant impacts on the physical, social and economic environments can be fast-tracked and could escape the scrutiny of comprehensive environmental assessment and oversight. The danger here is that the current process can severely undermine and diminish the validity of an EIA. As professionals this is a grave matter for concern.

The logical issue that begs the question is what is the basis for the EMA granting a CEC for a project that is a Designated Activity? The legislation is silent here. In some instances, an Environmental Impact Assessment may be required and this is done on the basis of the discretion of the EMA. Again, the legislation is silent here on the basis of that decision. However, the EMA reserves the right to assume its own discretion in matters of deciding whether CEC is required and whether an EIA is required in the process of development approval associated with the grant of the CEC. In some instances, there is the perception that important projects can commence without an EIA. This actually happens and is quite common for public sector type projects.

The issue of what is the basis for a decision is undoubtedly an important one. This is an issue that we ourselves as professionals have not resolved- the matter of Valuation of the Environment. Different countries adopt different perspectives in law on valuation. This would allow for consistency of decisions and encourage debate. Allowing the EMA to make these decisions when it is not the competent authority on matters of valuation is a grave social, environmental and economic injustice. Moreover, in the laws of Trinidad and Tobago, the competent authority on matters of Valuation is afforded by the Commissioner of Valuation of the Valuation Division. Sadly, this division is not consulted on these matters.

Clearly, there are some deficiencies in the legislation, and even where the legislation is clear on procedure, this may not be supported in practice, as highlighted earlier. More intriguing is the outcome of the preparation of the Terms of Reference for an EIA.

The practice has been that the EMA prepares draft terms of reference (TOR) after consultation with some key stakeholders. These TORs are often not contested by the applicant who simply wants to get through the approval process as quickly as possible. The problem is that procedurally, the applicant is supposed to start the round of public participation to finalize the TOR. This is often not the case. This is a critical deficiency that should be addressed.

It is usually at the stage thereafter, when the TOR has been finalized and becomes a contract between the client and the EMA that the deficiencies in the TOR are identified. As EIA professionals, the TOR defines our scope of works and our fee structure. It is also the basis for successful tendering and award of contracts. This means that at the important stage of tendering for contracts, we are forced to define our fee structure based on the TOR at hand and the process of environmental oversight. A deficient TOR

may not only be deficient, but may also be irrelevant. This combined with a deficient approval process provides the opportunity for a significant deviation between doing **a job as legally contracted and doing a job right**. It comes down to an ethical issue. This invariably translates to additional costs and time and is often the cause of great concern by clients who now question the validity of the process and the relevance of the EIA and our profession.

While the first ones to discover the errors or deficiencies in TORs are the professional EIA specialists, it is often public sector agencies- including other approval agencies that later discover these deficiencies. In many instances, the key stakeholder agencies are often unaware that the TORs have been finalized. Still later, at the start of the EIA study- when there is the first public announcement, those glaring deficiencies are also recognized by the wider public. This means that an extremely important process is initially and severely overlooked in the assessment of projects- the identification of Valued Environmental Components (VECs). While our profession recognizes that it is the VECs that are critical in the process, the current CEC application process does not recognize this early, necessary and critical step.

Importantly, the current legislation does provide an avenue to remedy the situation. This is the important part played by meaningful public participation and consultation. However, public consultation occurs when the EIA is well underway. It is at this stage, when public consultations are held that the real issues and debates do emerge. The reality for development projects is that the client, especially if it is a public sector entity, is usually very skeptical about conducting Public Participation and Consultation. From the public perspective, the experience has been that there is distrust about the process and the role of EIA. This is highly understandable as the public has to make valiant attempts to embellish these issues and to force the client and the approval agencies to at least consider the issues that are being raised. In all instances, the essence of a frequent and recurring criticism by the wider public is that "Public consultation is a Public Relations exercise after all the decision have been made about the project" This continues to be a challenge in conducting EIAs as more efforts have to be devoted to ensuring that this perception is addressed and to encourage more meaningful participation.

### Multiple EIAs

In the legislation of the EMA, the EIA is considered an important part of the process in seeking development approval. However, the aforementioned Town and Country Planning Division (T&CPD) has had problems of jurisdictional overlap with the EMA. This issue has not been resolved. In fact, the T&CPD, has reserved the right to require another EIA, if it is not satisfied with the one prepared under the jurisdiction of the EMA. **The mere notion that another agency in the statutory approval process can actually require a separate EIA is an indication that all is not well in EIA practice in Trinidad and Tobago.** Applicants and clients alike, often get the feeling that it is a "cat and mouse" game among the regulatory authorities.

The question that arises is how relevant is the EIA? At this stage it is all seems a much familiar criticism. But what happens when the Terms of Reference (TORs) are flawed or weak, or for that matter the

process that determines the validity of EIA are irrelevant to and does not support professional practice. This is a common occurrence, and was actually what motivated this paper.

### Rectifying TOR Deficiencies

TORs are weak for a number of reasons- However; the principal reason is the current inability to focus on identifying Valued Environmental Components (VECs). The current process lacks meaningful participation from stakeholders. This is quite common and the quick fix adopted by the EMA at the EIA review stage is to request supplementary information. This is after the EIA report has been completed. Interestingly, there is a serious compromise between accountability and getting the job right. In many cases, the client is not required to furnish this additional information. It therefore comes down to a request. This means that there exists a legislative and Blue Print process for preparing really poor quality EIAs in Trinidad and Tobago.

The next factor that contributes to weak EIAs is simply the interpretation of technical terms. It is known that there is much confusion among all the legislation on the legal meaning of specific terms. There exists, sometimes stark contrast in meaning. This is a serious matter for environmental management and coordination. This gets further complicated when there are even over extended meaning and the conflicts in jurisdiction that occurs among other agencies. Case in point, the EMA is very clear what constitutes the Environment. The definition does not deal with the full spectrum of the human environment and does not deal with Socio-Economic issues. However, the EMA gives the impression that it has jurisdiction over management of these issues, when in fact it should perform a coordinating role on the management of the environment.

Consultants get immediately concerned when in a TOR, the EMA in asking about the socio-economic environment, for example, indicates that certain specific demographic data is required to be presented. In the first instance, this is not the socio-economic environment, and raises the issue of what specifically is driving the EIA. This often extends to physical planning issues and has caused considerable problems where the EMA has actually exceeded its jurisdiction and authority in making judgments or decisions on physical planning issues.

To be fair to the EMA, it is not incorrect to say that the Agency does not have a role to play in protecting human beings. However, this appears to be restricted to issues of human health- noise/sound levels, particulate and chemical emissions and water quality. The EMA can only manage the environment in the context of human beings, if the necessary rules governing the threshold levels for noise, particulate and chemical emissions and water quality etc are in place and given the weight of the law.

### The Way Forward: Initial Conclusions

As professionals who practice EIA, we simply cannot sit idly by. We have to be mindful that as a profession, our practice evolves and improves by leaps and bounds. The problem is that we are often stymied by legislative and bureaucratic deficiencies that seem set in stone.



Another issue is that while I would continue to have heated debates and arguments with my colleagues at the EMA, the fact is they are, for the most part all meaningful and dedicated professionals. I truly believe this. If the process cannot be fixed from within, then we as professionals need to ensure that we can put enough pressure to ensure that the necessary changes can be made.

Within recent times, the Minister of Planning has received complaints from applicants and even from public sector agencies of the delays in statutory approvals, particularly at the EMA processing stage. The complaint is that the process of environmental oversight by the EMA in the Statutory Approval process is now a serious impediment to development.

Another critical issue is the lack of trust by clients in these approval agencies. This has led to important decisions being made about projects (at the political level) even before the project's application has been submitted or reviewed by the statutory agencies. This means that the public's perception of the approval process and the EIAs has been at a very low level of confidence for some time. This has led, in recent times to concerted attempts from Environmental activists to take matters in to their own hands, often confrontational with the EMA and the law enforcement agencies.

The criticism of lack of relevance of the approval process for real development and important issues (VECs) being overlooked all together in projects, is very real. There is an opportunity here for the professional EIA specialist to address this issue. The question then, is can it be done by professionals who have tenaciously followed, conformed, and have supported the existing practice in Trinidad and Tobago. The jury is out on that one. What is clear is that efforts are about to commence to review the legislation and the process itself. Two (2) scenarios are now possible.

The preferred and optimistic scenario would be one where there can be truly and meaningful debate on the meaning of the environment- beyond an ecosystem perspective. The debate should include the role of the public in decisions and the link of the environment and in particular how we manage the environment for sustainable economic development. More specifically, the debate needs to address Valued Environmental Components (VECs) and the drivers or advocates of these VECs. The debate also needs to address the issue of value systems and Environmental Valuation.

Alternatively, the less preferred approach would be to look at the actual screening process itself that determines which projects need environmental oversight. In this regard, it is likely that through pressure from clients and applicants, that there would be a move to reduce or narrow the number of Designated Activities- as was the case for quarries or mines of a certain size and all housing projects. This could also mean a reduction in the number of triggers and an increase in the threshold for these triggers. This alternative approach would find favor with the clients and applicant and would certainly address the issue of environmental oversight that is disruptive and is an impediment to development. But this will not solve the problem of sustainable economic development.

Clearly much work needs to be done. But as professionals dedicated to providing a service, we have to be proactive and encourage debate on these issues. Where do we start? The issue of lack of trust in the process, and the jurisdictional issues are ethical issues. The legislation is already there in many instances, however, the overarching policy or consistency of policy is often lacking. If the policy is

lacking, the institutional framework that guide these institutions can become irrelevant or inefficient at managing the environment. The lamentation of the EMA on the fact that there are 100 pieces of legislation and over 50 agencies involved is clear indication of this.

While there needs to be consistency in Environmental policy, the important issues is how relevant is the Environmental Policy? Is it consistent with, say, Urban and Physical Planning Policy? What are the implications for really bad decisions?

Over a year ago, the environment and physical planning statutory approval agencies were merged under one Ministry. Though they have retained their identities, it means that this merger forces consistency in Environmental and Urban Policy. However, many professionals with vested interests would prefer that these agencies be kept in separate Ministries. This debate will continue for a long time to come. However, it is evident to this author that by bringing both Ministries together, the inconsistency in the development policy and practice can be exposed. This is a positive sign. Hopefully, the wisdom of this decision will ensure that jurisdictional issues and the conflicting policies are addressed.

As a consequence of this decision, important issues that impact on Cumulative Environmental Assessment can be addressed. In the framing of the EMA legislation and the rules governing Environmental Clearance, certain designated activities were softened to encourage development as aforementioned. These include housing developments (though the waste water issues does attract attention), and quarry operators below a certain size as aforementioned. These exceptions certainly do not make sense and undermines the effectiveness of environmental management and cumulative impact assessments. Are we as professionals to ignore these regional or strategic issues that have a bearing on the outcome of the EIAs that we conduct?

While these may be overlooked here simply because these are omitted from the TORs or for that matter not covered under a budget item in our work, these issues can be triggered by legislative monitoring of environmental conditions and for example identification of point sources of pollution. The implication is that there has to be effective and consistent efforts at monitoring environmental quality and points to the need for an atmosphere or through lack of a better term, an environment fosters and facilitates the collection of relevant baseline conditions and effective monitoring and enforcement of the environment.

While there is optimism that the wider issues could be incorporated, including socio-economic issues, I am less optimistic how we approach the monitoring challenge for triggers and thresholds for socio-economic issues, for example, gender issues, poverty, exclusion, employment and our belief systems.

Let us turn our attention to the primary agency that has responsibility for the environment. The EMA is that agency. In the eyes of the public, there is certainly an expectation that they are the ones to police the environment. This is a very positive sign, should be encouraged and is an important element to build upon.

However, the issues of methodology and jurisdiction and indeed the framework for strategic environmental assessments and cumulative environmental assessments cannot be underemphasized. It

is evident that the concept of the EIA as practiced and managed in Trinidad and Tobago is much cause for concern. We as professionals need to engender a new way of thinking. We need to advocate the use of Cumulative Environmental Assessment and Management, rather than the idea of the EIA as is used in Trinidad and Tobago. This means that we need to be talking more about CEAM and how this differs from EIA as was practiced. This will be a challenge as we all know that conceptually originally, EIA=CEAM.

I have attempted to demonstrate that we do have problems in Cumulative Environmental Assessment in Trinidad and Tobago. These problems are not insurmountable. As dedicated professionals, we have an important role to play and to shape the process. It is therefore important to recognize that as professionals, we must stand by our ethical principles or the ethical principles of our profession. For me, this is the primary framework. It is the precondition that sets us apart. This is no easy task when our clients, including government clients, are too eager to bypass the EIA process or to get through as quickly as possible. I have no answers for this. What is indeed apparent is that the public is very much aware of environmental issues and points to the need to ensure that the public can contribute meaningfully in the process of development. It is after all, why we have development projects in the first instance.

I wish to reiterate that it is the public that appears to be the ones to drive the process and to establish the strategic framework for Cumulative Environmental Impact Assessments. This may be a shocking revelation for many who are used to the notion that planners and professionals know what is best in the public's interest. We therefore have to partner with the public in ways un-heard of and we have a duty to go far beyond that required in law and even established procedures in conducting public participation. Perhaps, this could be an important defining issue that helps us define the difference between EIA practices as they know it, to CEAM that holds much promise.

What ever route is taken- reengineering or putting old wine in new bottles, there has to be more emphasis on defining CEAM or EIA in broader terms- ecological, social and economic. There has to be more emphasis on defining Valued Environmental Components as well as actually defining the environmental values of these components. Ultimately, this involves a greater and deeper involvement of the public and a whole new way of thinking how we address development in the process of statutory approvals.

My own experience is that if the public has concerns, then these should be brought to the fore in the public consultation process in a meaningful way. In fact, this approach often provides an interesting framework for discussion where left leaning ideas clash with that of the general public. This is necessary as it forces discussion on new ways and perspectives about development projects.

I have suggested that the public and key stakeholders should be involved very early in the process and not seen as an after thought or public relations exercise. In many instances, it is the public who are the ones to redefine the framework for environmental oversight. It is far easier to go this approach than to criticize the regulatory agencies about weak TORs, insufficient focus on strategic issues, jurisdictional issues. Whether or not there would be reform, weak legislative frameworks will emerge from time to

time. As professionals we must not give up and face these challenges while adhering to strict ethical practices and principles.

I thank you.

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