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## Promoting system-level learning from project-level lessons An analysis of donor-driven 'indirect' learning about EIA systems in Ghana and the Maldives

Amos A. de Jong <sup>a</sup>, Hens A.C. Runhaar <sup>b,\*</sup>, Piety R. Runhaar <sup>c</sup>, Arend J. Kolhoff <sup>d</sup>, Peter P.J. Driessen <sup>e</sup>

<sup>a</sup> Innovation Management, Utrecht, The Netherlands

<sup>b</sup> Section of Environmental Governance, Utrecht University, Utrecht, The Netherlands

<sup>c</sup> Organisational Psychology & Human Resource Development, University of Twente, Enschede, The Netherlands

<sup>d</sup> The Netherlands Commission for Environmental Assessment, Utrecht, The Netherlands

<sup>e</sup> Department of Innovation and Environment Sciences, Utrecht University, Utrecht, The Netherlands

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#### ABSTRACT

A growing number of low and middle income nations (LMCs) have adopted some sort of system for environmental impact assessment (EIA). However, generally many of these EIA systems are characterised by a low performance in terms of timely information dissemination, monitoring and enforcement after licencing. Donor actors (such as the World Bank) have attempted to contribute to a higher performance of EIA systems in LMCs by intervening at two levels: the project level (e.g. by providing scoping advice or EIS quality review) and the system level (e.g. by advising on EIA legislation or by capacity building). The aims of these interventions are environmental protection in concrete cases and enforcing the institutionalisation of environmental protection, respectively. Learning by actors involved is an important condition for realising these aims. A relatively underexplored form of learning concerns learning at EIA system-level via project level donor interventions. This 'indirect' learning potentially results in system changes that better fit the specific context(s) and hence contribute to higher performances. Our exploratory research in Ghana and the Maldives shows that thus far, 'indirect' learning only occurs incidentally and that donors play a modest role in promoting it. Barriers to indirect learning are related to the institutional context rather than to individual characteristics. Moreover, 'indirect' learning seems to flourish best in large projects where donors achieved a position of influence that they can use to evoke reflection upon system malfunctions. In order to enhance learning at all levels donors should thereby present the outcomes of the intervention elaborately (i.e. discuss the outcomes with a large audience), include practical suggestions about post-EIS activities such as monitoring procedures and enforcement options and stimulate the use of their advisory reports to generate organisational memory and ensure a better information dissemination.

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#### 1. Introduction

Despite some promising developments and rather extensive efforts of both donor and recipient actors in the past two decades, EIA systems in many low and medium income countries (LMCs) are rather weak (Ali, 2007; Alshuwaikhat, 2005; Appiah-Opoku, 2001; Kolhoff et al., 2009; Modak and Biswas, 1999; Sankoh, 1996; Van Loon et al., 2010). EIA systems encompass formal procedures, tasks and responsibilities laid down in *legislation* and *capacities* of the key actors that are assigned a role in EIA procedures (proponents, competent authorities and various sorts of stakeholders) to fulfill these roles (Kolhoff et al.,

2009; Van Loon, 2010).<sup>1</sup> Indicators of weak EIA systems in LMCs include incomplete EIA legislation (e.g. no scoping obligations), capacity deficiencies (such as a lack of scientific data and EIA expertise, a lack of monitoring and enforcement after licencing, weak organisational and communication skills, limited access to information and a lack of other resources) (Ali, 2007; Appiah-Opoku, 2001; Kolhoff et al., 2009; Sankoh, 1996; Van Loon et al., 2010). These EIA system deficiencies in turn contribute to a low system performance in terms of a timely delivery of valid information and the contribution to environmental protection (Kolhoff et al., 2009; Wood, 2003). Donors often struggle to construct links between their intervention programmes and the complex societal practice in LMCs. Their interventions typically are either at the EIA *project level* –e.g. advice on the content or quality of the EIA reports that are

<sup>\*</sup> Corresponding author. Tel.: + 31 030 253 3097.

*E-mail addresses:* amosdejong@gmail.com (A.A. de Jong), h.a.c.runhaar@uu.nl (H.A.C. Runhaar), piety.runhaar@wur.nl (P.R. Runhaar), Akolhoff@eia.nl (A.J. Kolhoff), p.driessen@geo.uu.nl (P.P.J. Driessen).

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<sup>&</sup>lt;sup>1</sup> Capacities include for instance management and communication skills, scientific expertise, availability of ICT applications and financial resources.

part of the construction of an oil platform or the reclamation of land- or at the system level -e.g. advice on EIA legislation or capacity development programmes for key EIA actors (Kolhoff et al., 2009; Van Loon et al., 2010). Whereas project-level interventions aim at environmental protection in concrete decisions, system-level interventions aim at enhancing environmental protection via the institutional context. An important condition for donor interventions to be successful in terms of realising the above aims is *learning* on the part of actors involved. Adapting projects or EIA system components as a consequence of donor advice namely requires that advice is taken notice of, understood and reflected upon against existing plans or systems. In EIA literature there is growing interest in learning evoked by EIA (e.g. Cashmore et al., 2008; Fischer et al., 2009; Fitzpatrick and Sinclair, 2003; Nilsson, 2005; Robinson and Bond, 2003; Runhaar et al., 2010; Valve, 1999). However, Jha-Thakur et al. (2009) observe that the understanding of learning evoked by EIA (and other forms of environmental appraisal) remains 'embryonic': still limited empirical evidence has been collected, hindering an assessment and explanation of this phenomenon. In this paper we discuss the results of an exploratory study on learning effects associated with donor interventions in LMCs. Our aim is to shed light on a particular type of learning we ran into, namely 'indirect' learning at system level. Through interactions and advice at project-level, donors may enhance awareness of system deficiencies such as unclear EIA legislation or insufficient capacities. This 'indirect' learning at system level complements 'direct' learning through system-level interventions such as capacity-building programmes and potentially results in adjusting EIA systems in manners that better fit the specific context and hence realise a better performance (Cherp, 2001; Cherp and Antypas, 2003; Kolhoff et al., 2009). These (potential) outcomes are often neglected by donor agencies for they generally do not consider indirect learning at system level as one of the goals of their project-level interventions. In fact, they often are not even aware of these effects.<sup>2</sup> Thus far, indirect learning at system level has not been discussed in EIA literature. With our paper we hope to contribute to our knowledge on learning evoked by EIA, both empirically (by focussing on LMCs) as well as conceptually (by addressing 'indirect' learning). In this paper we therefore address the following question: To what extent do projectlevel donor interventions contribute to system-level learning, and what are the explanatory factors for indirect learning at system level? We analyse project-level interventions by the independent expert body the Netherlands Commission for Environmental Assessment (NCEA).

#### 2. Analytical framework

#### 2.1. Indirect learning in the context of EIA

Learning is often defined as a full experience, i.e. cognitive change due to knowledge acquisition and, ideally, a subsequent change in behaviour (cf. Jha-Thakur et al., 2009; Joy and Kolb, 2009; Kolb, 1984; Mainemalis et al., 2002). In policy and organisational literature usually a distinction is made between single loop and double loop learning (see for instance Argyris, 1977; Nilsson, 2005). Single loop learning (oriented at manners to perform certain plans and their outcomes) occurs when actors recognise a mismatch between actions and outcomes in practice and alter original actions accordingly. Double loop learning (addressing the ideas and theories that constitute a mandate for action) occurs when such mismatches are corrected by adjusting the variables that underlie the original actions, i.e. strategies, behaviours and cultures (Argyris, 1977; Jha Thakur et al., 2009), for example when lessons learned by individual co-workers are integrated in organisational policies (Argyris and Schon, 1978). Double loop learning is thus of a higher order and more radical than single loop learning, as it relates to 'why' questions rather than 'how' questions (ibid; Fischer et al., 2009). Double loop learning however usually requires longer time horizons than single loop learning. A specific form of double loop learning is assimilation of environmental understanding into norms and practices (Jha Thakur et al., 2009), also called 'internalisation' of environmental values (Runhaar and Driessen, 2007). Single loop and double loop learning may occur individually but also collectively (e.g. within a project team or organisation). EIA project-level learning will probably address technical issues related to the project - e.g. single loop: what alternative mitigation measures can help reducing environmental pressure? and double loop: given the environmental impacts foreseen, does this initiative really contribute to a higher social welfare or should we allocate our resources to other projects? System-level learning (whether or not promoted by donor interventions) will probably address the relationships between the EIA system and its performance in practice – e.g. single loop: what is the best way to translate EIS findings into the licence requirements? how can we organise a more effective enforcement of EIA legislation? and double loop: does the national EIA legislation cover all relevant project decisions, or do we need to expand it, for instance to include SEA (to account for cumulative effects)? What we call 'indirect EIA learning' refers to both single loop and double loop learning at system level evoked by project level experiences and lessons. For instance, during EIA processes supported by donor organisations, local actors may become aware of certain shortcomings of the EIA system that governs their behaviour. Local actors may realise that problems in EIA processes show a repetitive pattern (problems with EIA have been faced before in other projects) and hence are related to the system as a whole.

#### 2.2. Promoting factors for indirect learning

To explain indirect learning at the system level, we make use of literature on single and double loop learning, which is widely studied within the context of organisational learning (e.g. Argyris and Schön, 1996; Weick, 2001) and policy learning (e.g. Runhaar et al., 2010). Learning is considered as a process of making sense of aspects of the world around us, which is based on our frames of reference. Behaviour in general (Schneider, 1987) and learning specifically (e.g. Adler and Kwon, 2002) is always a function of the interplay between individual characteristics on the one hand and characteristics of the environment on the other hand. So we aim to find out what factors within and outside individuals may stimulate people to take the risk of reflecting on own actions and changing one's assumptions if necessary.

#### 2.2.1. Individual characteristics

In the literature on learning within organisations (e.g. Blumberg and Pringle, 1982) capability and motivation are two interrelated individual variables that play a role in learning. The importance of capability for learning is recognised by Jha Thakur et al. (2009) (referring to actors' skills in terms of communicative, project management, leadership, team working, stakeholder management, conflict resolution and time management). In addition, new knowledge will only lead to changes if this knowledge is understood (Powell, 2006). The ability can be influenced by the sponsor, in that the knowledge of the sponsor has to be translated in such a way that it makes sense to the recipients, i.e. the local parties. "Failure to achieve this means that we may have created knowledge, but we have not created the conditions in which it can be applied (ibid, p.520)". Next to 'objective' capability, one's perception of capability plays a role too. In research on learning in organisations, much attention is paid to people's sense of self-efficacy, referring to the degree to which one is convinced that s/he can cope with difficulties s/he encounters in her/his work (Bandura, 1977). This is especially relevant in double loop learning since reflection on own assumptions can enhance the feeling of vulnerability and failure. A strong sense of self-efficacy in this sense can act as a 'buffer' for the scary consequences of double

<sup>&</sup>lt;sup>2</sup> Source: experiences of the fourth author of this paper acquired during more than 10 years of advisory work on behalf of the NCEA in LMCs.

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