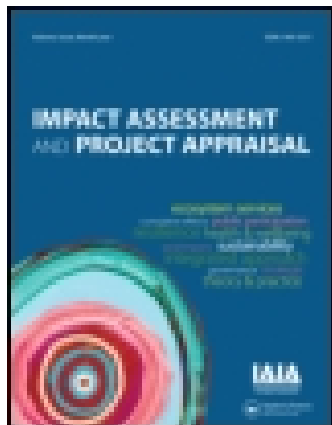


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## PROFESSIONAL PRACTICE PAPER

### Using rapid SEA to influence national planning in Namibia

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This article describes a rapid strategic environmental assessment (SEA) of Namibia's Fourth National Development Plan (NDP4) (2012–2013 to 2016–2017). The authors believe this to be the first application of such an approach to a national development plan that typically charts a country's key over-arching development objectives and targets. It was undertaken over four weeks and involved a preparatory desk review of the objectives and implementation strategies of NDP4, Vision-2030 and key sector policies, as well as several other policies. The results were analysed during half-day, facilitated, multi-stakeholder focus sessions convened for each of five policy clusters that drive development in Namibia: land and agriculture, water, conservation and tourism, mining and industry, and fisheries. Policy performance and synergies/antagonisms within and between policies were assessed, and how policy elements might be improved to enhance synergies/reduce antagonisms and improve their contribution to sustainable development and achieve the goals of NDP4 and Vision-2030. This rapid approach to SEA offers a cost-effective alternative to conventional SEA requiring many months, a team of experts and an extensive process.

**Keywords:** rapid; strategic environmental assessment; national development plan; vision; antagonisms; synergies

#### Introduction

Many countries base economic development around a series of successive National Development Plans (NDPs), each typically covering a five-year period. Usually they are developed by a national planning body working with line ministries and chart a country's key over-arching development objectives and targets, sometimes aligned to a long-term vision, and address how these are to be realised on a sector-by-sector basis. In Namibia, the first NDP covered the period 1995–1996 to 1999–2000. The fourth plan (2012–2013 to 2016–2017) was approved by Cabinet in July 2012. To support its implementation and to raise awareness at the highest levels of the value of strategic environmental assessment (SEA), in August 2012, the Ministry of Environment and Tourism commissioned a rapid SEA of NDP4 and associated strategies and policies.

A key principle of SEA is that there is no 'one size fits all' approach (Verheem & Tonk 2000). It needs to be customised to each context in which it is applied. Usually, helpful lessons to guide an appropriate methodology can be drawn from other applications with a similar focus. The authors have not been able to identify an example of an SEA applied to a NDP in a developing country. There was an intention to subject Bhutan's 11th NDP (2013–2018) to an SEA under the SEA regulations introduced in 2002, but bureaucratic politics prevented the implementation of the regulation. However, Annandale and Brown (2012) describe how, instead, it proved possible to focus on mainstreaming environmental concerns into NDP11 based on SEA principles derived from the SEA Guidance (OECD DAC 2006).

In European countries, SEA is a statutory requirement for plans arising from EU Directive 2001/42/EC. An example from Scotland is an SEA of the Second National Planning Framework (NPF2), published in June 2009. NPF2 articulates the spatial consequences of policies for economic development, climate change, transport, energy, housing and regeneration, waste management, water and drainage, catchment management and the protection of the environment. It identifies key strategic infrastructure projects as national developments and reflects ambitious emissions targets for transitioning to a low-carbon economy. The SEA process included scoping, an interim assessment of the alternatives considered during strategy development, a fuller assessment of the draft National Planning Framework, and a supplementary assessment of candidate national developments. A similar example is the SEA of Montenegro's National Spatial Plan (NSP) carried out in 2006–2008 (Nelson et al. 2012). The NSP addresses such major issues as the choice and location of hydro-energy power stations; the routing of strategic road corridors; population and economic imbalances among the northern (mountainous), central, and coastal regions; and the management of tourism development pressures. The SEA rapidly became a central part of the public debate on the direction of development in Montenegro. Its findings highlighted policy inconsistencies and consequences and featured prominently on national television and in regional consultation meetings on the draft plan. The NSP incorporated a number of recommendations of the SEA.

SEAs have, of course, been applied to more-focused national plans and strategies. For example, following a

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pilot study, in 2003, an SEA of Ghana's Poverty Reduction Strategy (GPRS) was initiated by the National Planning Commission. This involved reviewing the GPRS through national sector studies, and initiating sustainability appraisals of all 110 district assembly medium-term development plans – the principal vehicles for implementing the GPRS (case study, p. 277 in Dalal-Clayton & Sadler 2005). Another example is from Benin where, in 2006–2007, the Agence Béninoise de l'Environnement (Beninese Environmental Agency) carried out a participatory SEA of the second Poverty Reduction Strategy Paper while it was being drafted (Dagba et al. 2012). However, we have found no actual examples of SEA being applied to an NDP in a developing country context, and none of such SEAs being undertaken in a rapid mode. Given that NDPs are a cornerstone of development in many countries, it is a matter of concern that none appear to have been subjected to an SEA or equivalent process. This may be because most governments perceive SEAs to be time-consuming and costly. A rapid SEA approach may be seen as a more attractive and economic option, which can play a key role to enhance the mainstreaming of environmental and social considerations in the preparation and implementation of NDPs, and foster sustainable development.

### Background to national planning in Namibia

In 2004, the Namibian government approved Vision-2030 setting the nation's long-term vision for 2030 as 'A prosperous and industrialised Namibia, developed by her human resources, enjoying peace, harmony and political stability'. In particular, Vision-2030 embraces sustainable development as a key objective. It provides long-term alternative policy scenarios on the future course of development in Namibia at different points in time up until the target year 2030. It also spells out the country's development programmes and strategies to achieve its national objectives, and is designed to serve as a guide for Namibia's five-year NDPs.

The NDP3 (2007/2008–2011/2012) was the first National Plan to be framed around the eight Vision 2030 objectives.<sup>4</sup> In July 2012, the National Planning Commission (NPC) published the Namibia's Fourth National Development Plan (NDP4) covering the period 2012/2013–2016/2017. Elaboration of detailed programmes on how to achieve its goals and targets is the responsibility of the various Offices, Ministries and Agencies (O/M/As) responsible for the relevant sectors. During 2013, these detailed O/M/A plans were being scrutinised by the NPC to ensure that they fitted into the programme logic and had a reasonable chance of being actualised. Previous NDPs contained many goals and proposed strategic actions to achieve them, but implementation has been disappointing. Thus, in an effort better to achieve progress towards the aims of Vision-2030, NDP4 focuses on just three carefully selected and sequenced goals (and associated target values): high and sustained economic growth; increased income equality; and employment creation. Although other sectors will not be

neglected, attention is focused on four priority economic sectors to create the necessary momentum for economic growth and to ensure the impact and results of the country's efforts are optimal (logistics, tourism, manufacturing and agriculture). There is also a strong emphasis on formalised monitoring and evaluation (by NPC) to encourage accountability.

NDP4 was developed between September 2011 and July 2012 – rather more quickly than had been expected. There was a delay in starting the process, partially due to a change in the leadership and structure of NPC. A concept paper was first prepared setting out its proposed scope as a 'high-level' document focusing on four priority sectors rather than a 'stapled' collection of what all sectors are already doing. This approach was discussed at a stakeholder meeting with ministries, development partners, unions and NGOs. The concept paper was then approved by Cabinet. Drafting of NDP4 was undertaken by a Committee (seconded officials from government and parastatals) in consultation with the lead entities for each priority sector. Workshops were organised with the lead entities and also with a limited number of key stakeholders. One of the committee members was responsible for handling environmental concerns and consulted with the Ministry of Environment and Tourism (MET). MET subsequently agreed to submit a contribution on environmental issues for incorporation in the NDP4 document. However, environmental and social issues were not adequately addressed in NDP4.

Following government approval of NDP4, key sectors were requested to develop sector plans setting out their modalities to implement their contributions to achieving the plan's sector goals. To raise understanding and provide orientation for this task, NPC organised several sensitisation meetings with these key sectors. NDP4 was deliberately focused on just four priority sectors. This resulted in some sector O/M/As feeling that 'their' sectors had been 'left out' of NDP4 (e.g. land and mining), perceiving that the non-prioritised sectors were no longer important or had 'second tier' status. It appears that, in some sectors, there was resistance to preparing implementation plans – which may partially explain why only 50% of sectors had (by October 2013) submitted draft implementation plans to NPC.

### Methodology for rapid SEA

A year after the NDP4 was approved by Cabinet, the Directorate of Environmental Affairs (DEA – within MET) commissioned a rapid SEA of NDP4 with three key aims, to:

- Demonstrate the value of SEA as an instrument to address environmental sustainability and sustainable development – particularly as DEA is developing SEA regulations for Namibia;
- Draw attention to possible major environmental concerns and how to address them when implementing the basic development enablers and economic priorities;

- Clarify the role of renewable natural resources, especially biodiversity and ecosystem services, not only as basic enablers of development but also as contributors to achieving economic growth.

The specific objectives of the SEA were to critically review NDP4 in the context of sustainability to: (a) identify the likely environmental and social impacts of its implementation, and critical environmental and social issues not addressed in NDP4; in order to (b) provide a basis for sectors to consider adjustments to policies, plans and programmes during NDP4 implementation.

It is well accepted that SEA is most useful when undertaken as a fully integrated part of the planning process itself or at least as a parallel process with opportunities identified to inform and support such planning (Dalal-Clayton & Sadler 2005; OECD DAC 2006). In this regard, an SEA of an NDP would be expected to take as long as plan development itself (probably in excess of one year). But, in this case, the NDP4 has already been approved by Cabinet and is under implementation. So the SEA could only be an *ex-post* process. The DEA required the SEA to be undertaken quickly in order to be useful in 'steering' NDP and O/M/A/s to address environmental and social concerns in finalising sector implementation plans for NDP4.

Four weeks were allocated for the SEA with a two-person team (one external, one Namibian). As a result, this SEA was a 'rapid SEA' and could not be pursued in the way that a full SEA over a longer period might have been designed.

The primary purpose of NDPs in Namibia is to deliver Vision-2030 and thus sustainable development, proposing course corrections where necessary. To maintain a sustainable development focus, the SEA needed to assess how NDP4 affects, and is influenced by, the entire policy landscape. But NDP4 is focused on only four priority sectors – and thus other sectors are not discussed in detail. So the SEA could not be an assessment of the NDP4 document alone; a wider perspective was required. It therefore involved a preparatory initial desk review of NDP4, Vision-2030 and key sector policies, as well as several other policies (e.g. the Second National Biodiversity Strategy and Action Plan, the Human-wildlife Conflict Policy and the Climate Change Policy). Each of these documents was analysed in terms of their main objectives and the strategies identified to achieve those objectives against five strategic policy clusters that drive development in Namibia: land and agriculture, water, conservation and tourism, mining and industry, and fisheries.

The results of these analyses were presented in tabular form<sup>5</sup> to half-day, facilitated, multi-stakeholder focus sessions (participants numbers ranging between 15 and 25). These were convened for each of these five clusters. Each session reviewed the main thrusts of the concerned policies and participants shared perspectives on policy performance (e.g. implementation contributing well or poorly to sustainable development) and synergies/antagonisms within and between policies. They also

identified how policies elements might be improved to enhance synergies/reduce antagonisms and improve their contribution to sustainable development and achieving the goals of NDP4 and Vision-2030. The results of the focus session deliberations were recorded in tabular form.

In a rapid SEA of very limited duration, it was not possible to analyse all policies, nor the myriad, complex linkages between them and the anastomosing web of impacts associated with them. That is the function of a full SEA and takes considerable time and effort. However, the focus sessions clearly revealed the main concerns.

The next step was to undertake 'snapshot' analyses of key sectors. Each snapshot summarised the key objectives and strategies set out in Vision 2030, NDP4 and the relevant standing sector policies (a more detailed analysis was provided in the preparatory desk reviews of key documents). It also provided a summary assessment of the key cumulative impacts, antagonisms and synergy options associated with the sector. Case boxes were included in the SEA report to illustrate some of the antagonisms or synergies identified.

In addition, briefer assessments of the energy, health and education sectors were carried out to identify the main environmental and social issues related to the main objectives set for these in Vision-2030 and NDP4.

### Some key concerns

#### *Cumulative impacts, policy antagonisms and synergies*

While Vision 2030 addresses environmental objectives and concerns reasonably well, NDP4 makes only limited references to environmental issues that might be linked to its goals and implementation. Neither instrument, nor associated sector policies and strategies, address the linkages between sectors, nor identify where synergies can be achieved, and policy antagonisms reduced. They do not consider the possibilities of cumulative environmental or social impacts (positive or negative) that may arise across key sectors in driving the four economic priorities. This is a key and compounding concern. While the rapid SEA could only provide an illustration ('scratching the surface' as one observer aptly put it) of such concerns, it nevertheless identified the key issues and the more obvious synergies and antagonisms between sector policies. But, clearly, the impacts of implementing NDP4 and future NDPs will be complex and inter-linked and would require a full SEA to assess thoroughly. Such an SEA, and particularly more focused SEAs of individual sector policies and plans, would be expected to identify likely direct (primary) impacts. There will also be a wider array of knock-on effects (secondary, tertiary impacts, etc.), which will be more speculative, with multiple outcomes possible. Policy conflicts are likely to generate a range of important cumulative, environmental and social problems: land degradation; loss of scenic value and sense of place, habit and biodiversity loss; pollution of land, water and air; over-abstraction of water from rivers and aquifers; livelihood insecurity, involuntary resettlement and health impacts. Examples of policy antagonisms

include: industrialisation versus tourism, irrigation versus other uses of water (e.g. for industry and urban growth), and mining versus fisheries. But equally, the rapid analyses also highlighted a range of areas where such antagonisms can be reduced by investing in potential synergies, which can lead to positive environmental and social outcomes. A fuller SEA process would identify many more such opportunities.

### *The problem of operating in sector ‘silos’*

Both Vision-2030 and NDP4 are conceived and structured (like all governments and international bodies) in ways that inevitably drive *de facto* planning and policy implementation along sectoral lines, such that sector policies, strategies, programmes, plans and projects are mainly independent, unaligned and unintegrated. Sector ministries are poorly equipped to (a) identify potential inter-sector antagonisms and synergies since they generally operate in ‘silos’ – therefore the former largely remain unaddressed and the latter un-achieved; and (b) to seek opportunities for integration necessary to achieve sustainable development objectives (identified as the cornerstone of Vision-2030). Such sectoral isolation is illogical. The rapid SEA concluded that it can only undermine achieving Vision-2030 and delivering NDP4 aims effectively. Higher level mechanisms are needed (perhaps best driven by NPC) to provide for greater multi-stakeholder dialogue and reflection on key challenges (particularly environmental and social) and possible solutions, leading to better selection of policy priorities and implementation modalities. This would have the added benefit of generating wider stakeholder buy-in when agreeing the objectives of successive NDPs, and lead to improved cooperation in implementation.

### *Focusing on development hubs*

Policy inconsistencies are sometimes not obvious at national level, and cumulative environmental and social impacts will always be difficult to identify at this level due to the general and often vague nature of policies. But they become much clearer at more local levels where their translation into implementation becomes more specific – especially, in Namibia, in areas that are fast-developing as *industrial hubs*, for example, Windhoek–Okahandja; Central Namib and coastline, and North-central Namibia.

In addition to industrial hubs, there are *eco-hubs*, mostly in more remote areas and typically with a different set of challenges, comparative advantages and priorities compared to industrial hubs. Examples of these include Etosha-Kunene, Central Namib, Sperrgebiet, Bwabwata, Fish River-Orange and Khaudum-Tsumkwe. Furthermore, one can identify the key hubs for irrigation (or agro-industry) as well as marine fisheries. In some cases, there are overlaps (and conflicts) between two or all of these types of hub (Figure 1). In these places, there are many projects being developed at the same time, and usually they are subjected to an EIA. Very often, the EIA identifies

a range of issues that links back to policy inconsistencies (e.g. mining in protected areas).

### **Improving the NDP process**

The SEA recommended two ways in which the NDP process could be improved to address some of the issues raised above.

Firstly, facilitated sessions (a half-day per key sector) could be organised to unpack key antagonisms and potential synergies (within and between sectors), and to identify potential steps to reduce or build on these respectively. This could be undertaken as a part of developing and adjusting NDP4 implementation plans, involving those responsible for developing the plans and other stakeholders (to provide broader perspectives).

Secondly, as part of operationalizing NDP4, multi-sector roundtable consultations could be organised in selected major development hubs (involving key driver sectors and sectors that are growth enablers, and other stakeholders) to strategise on how to reach overall national goals in those specific geographic areas. This approach is an alternative to sectors preparing – in isolation-stand-alone implementation strategies in response to NDP4 (which is very likely to perpetuate the historical problem of ‘silo thinking’). By working together as multiple sectors at local level, senior officials, parastatals, the private sector, civil society and development partners would be tasked to find ways of overcoming antagonisms, identify synergies and reduce cumulative impacts of a range of projects in each hub. Such a pilot exercise would provide valuable lessons and may offer a way of focusing future NDPs.

The SEA concluded that in trying to correct for the disappointing outcomes of earlier NDPs, NDP4 has perhaps driven the pendulum too far towards a narrower highly focused canvas, which barely addresses environmental concerns, leaving unpainted the broader sector landscape and leaving unexplored the web of multiple and interacting linkages between sectors – and associated environment and social issues. Yes, prioritisation is necessary. A scattergun approach to include a very large array of desired goals will be counter-productive and unlikely to succeed. But, at the same time, it is vital to keep all sectors and stakeholders ‘on board’ rather than alienated. They need be part of discussing and agreeing the big picture, understand its complexities, and see clearly the role that all must play in the complex jigsaw of sustainable development and delivering Vision-2030 and periodic NDPs. This suggests that in prioritising, it still remains necessary to discuss the full breadth of challenges, options and objectives (and particularly the environment and social issues associated with them). It is unwise to assume that all actors will recall that they are covered by Vision-2030. Few people are likely to keep Vision-2030 and the latest NDP side-by-side and cross-reference during their work. Experience shows that the fundamental issues need to be constantly reinforced to maintain understanding and buy-in.

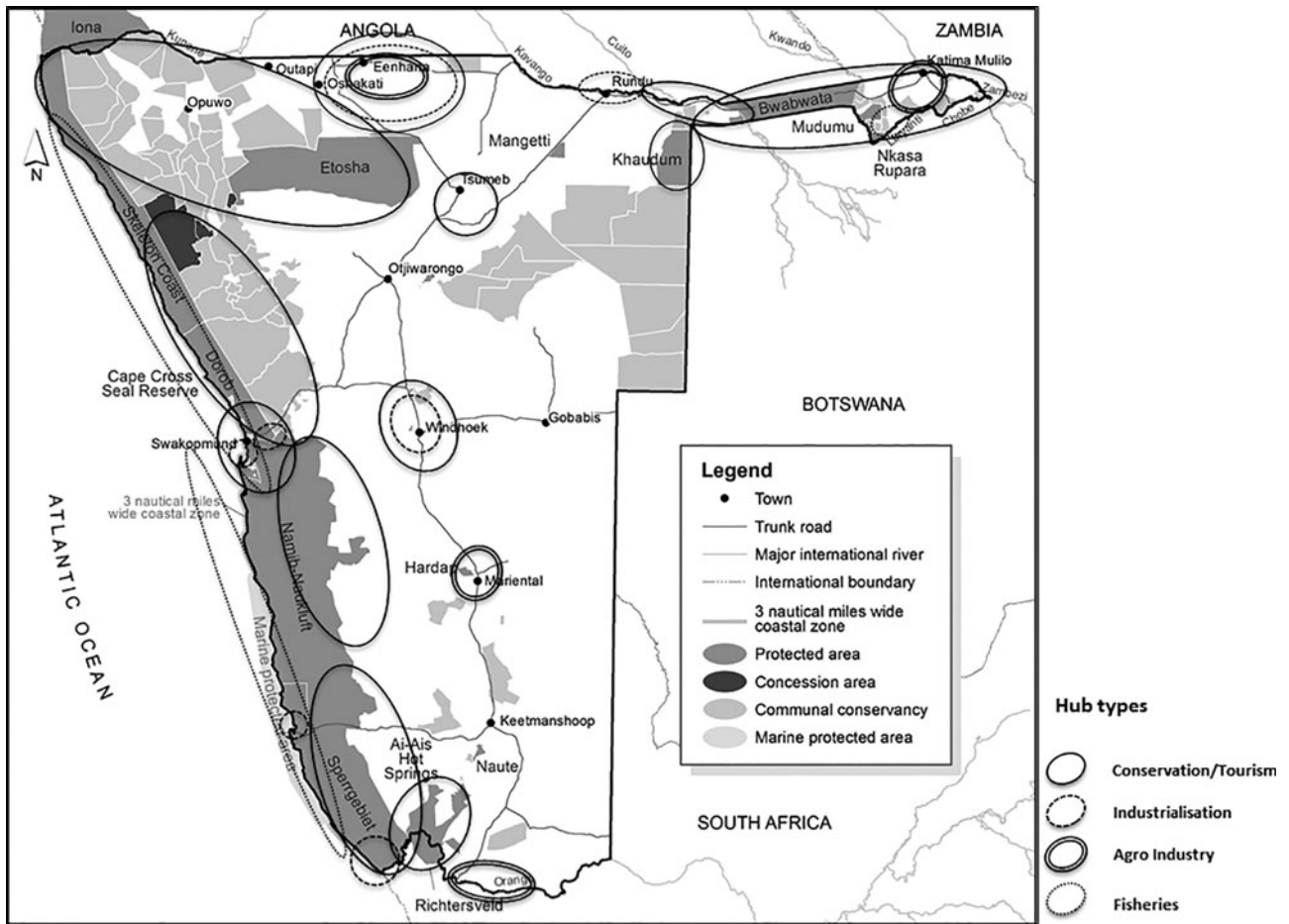


Figure 1. Industrial, conservation, fisheries and irrigation hubs in Namibia.

Future NDPs will secure more understanding and support if they set out the alternatives that have been considered and the reasons for selecting particular priorities; and spell out more clearly not just who must take the lead on particular themes or key objectives, but the role others must play – particularly (as regards cumulative environmental and social effects) to reduce antagonisms and to seek and achieve synergies.

The best way to address the above concerns is to incorporate a full SEA-type of process in preparing all future NDPs, possibly as a parallel activity or, better still, one that is fully embedded within the process of NDP development.

### Outcomes and conclusions

NDP4 was already in its implementation stage, so the DEA's objective was for a rapid SEA to raise awareness of the gaps in NDP4 regarding key strategic environmental and social issues and to provide some guidance on the steps that sectors might take to make 'course' corrections and address such concerns in policies implementation plans – provided the SEA could be undertaken rapidly.

Of course, through a full SEA it would have been possible to be more thorough, engage with a wider array of stakeholders and examine issues at national and local levels, etc. But despite the contracted time and process that

was possible, the rapid SEA was able to identify and unpack the main drivers of development, and assess the fundamental concerns regarding the major environmental and social issues linked to NDP4 and associated national and sector strategies and sector policies. The SEA report was shared with various senior government officials, but met with mixed reaction – from appreciation for an honest appraisal and the opportunity afforded for stakeholders to examine inter-sectoral concerns, to defensive (and illogical) rejection of some findings by the NPC – probably because it revealed the inadequacy of the plan in terms of environmental and sustainability considerations. Clearly the report exposed fault lines between government agencies. Ultimately, the Ministry of Environment elected not to issue the report under its own banner as an 'official document' endorsed by government, but rather as an independent assessment. Nevertheless, the report has generated considerable interest in some of the ideas it puts forward, particularly the suggestion for conducting integrated sustainable land use and development plans – with SEA embedded within the process – for 'hubs' as a means for operationalising the NDP. A year after the rapid SEA of NDP4 was completed, Hub SEAs are being commissioned by government agencies for high-growth areas along the central and southern coast where industrial development, mining, fisheries, conservation and tourism are all clustered.

In this regard the rapid and ‘cheap’ SEA approach can be judged to have been cost-effective. Some participants in the process commented that because the rapid SEA was quick and highly focused, and presented in a concise and targeted report in a timely manner at a critical point in the development of sector NDP4 implementation plans, it has more potential to have strategic influence. It has served to raise awareness of the environmental and social dimensions of Vision-2030, NDP4 and sector policies, where potential antagonisms may arise, and the potential to build on possible synergies. At the time of completion of the rapid SEA, government O/M/As would probably have been unable and less inclined to ‘digest’ the detail of a full SEA report – even if it had been available. In this regard, highlighting the majority of the most important issues in this rapid and efficient manner was arguably of far greater value than taking many months, with a costly team of experts and extensive process, to try to cover all issues in depth.

Another unexpected (though indirect) outcome was a decision in 2014 by the Government of Botswana, after reviewing the report of the rapid SEA, to apply a similar rapid assessment (but following a sustainability focus) to support the development of Botswana’s Vision Beyond 2016 and its linked 11th National Development Plan. In this case the assessment has been ex-ante rather than ex-post and has had considerable influence on shaping the focus of both Botswana’s new vision and NDP. Many of the lessons from Namibia’s NDP4 rapid SEA process were directly applicable to Botswana’s NDP11 formulation.

While SEA uptake has seen exponential growth over the past 20 years, many government authorities remain sceptical about applying SEA – in large measure due to a lack of understanding about its role and how it can benefit policy-making and development decisions, and also a perception that it is very costly, requires a large team of experts, is time-consuming (taking many months) and will act as a ‘green break’ on development. A rapid and focused approach to SEA certainly offers a cost-effective option provided it is done well by skilled and experienced practitioners. With the latter caveat, and on the basis of the Pareto principle or 80–20 rule (Pareto 1971), a rapid SEA should be able to identify the most important issues (at least 80%) for much less effort than a conventional SEA (less than 20% of the time and cost). As with conventional SEA, a rapid SEA will have more influence and be better able to support policy-making and development decisions if undertaken as early as possible in such processes, and preferably fully integrated with them. Finally, a rapid SEA applied to an NDP or equivalent national strategy should have the added benefit of identifying where full SEAs are needed for major sector initiatives and what they need to focus on, and signal the linked cross-sector issues requiring to be addressed.

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## Notes

1. Web: [www.eds-international.org](http://www.eds-international.org)
2. [peter.tarr@saiea.com](mailto:peter.tarr@saiea.com)
3. Web: [www.saiea.com](http://www.saiea.com)
4. Inequality and social welfare; peace and political stability; human resources development and institutional capacity-building; macro-economic issues; population, health and development; Namibia’s natural resources sector; knowledge, information and technology; and factors of the external environment.
5. See <http://www.saiea.com/Publications.htm>

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