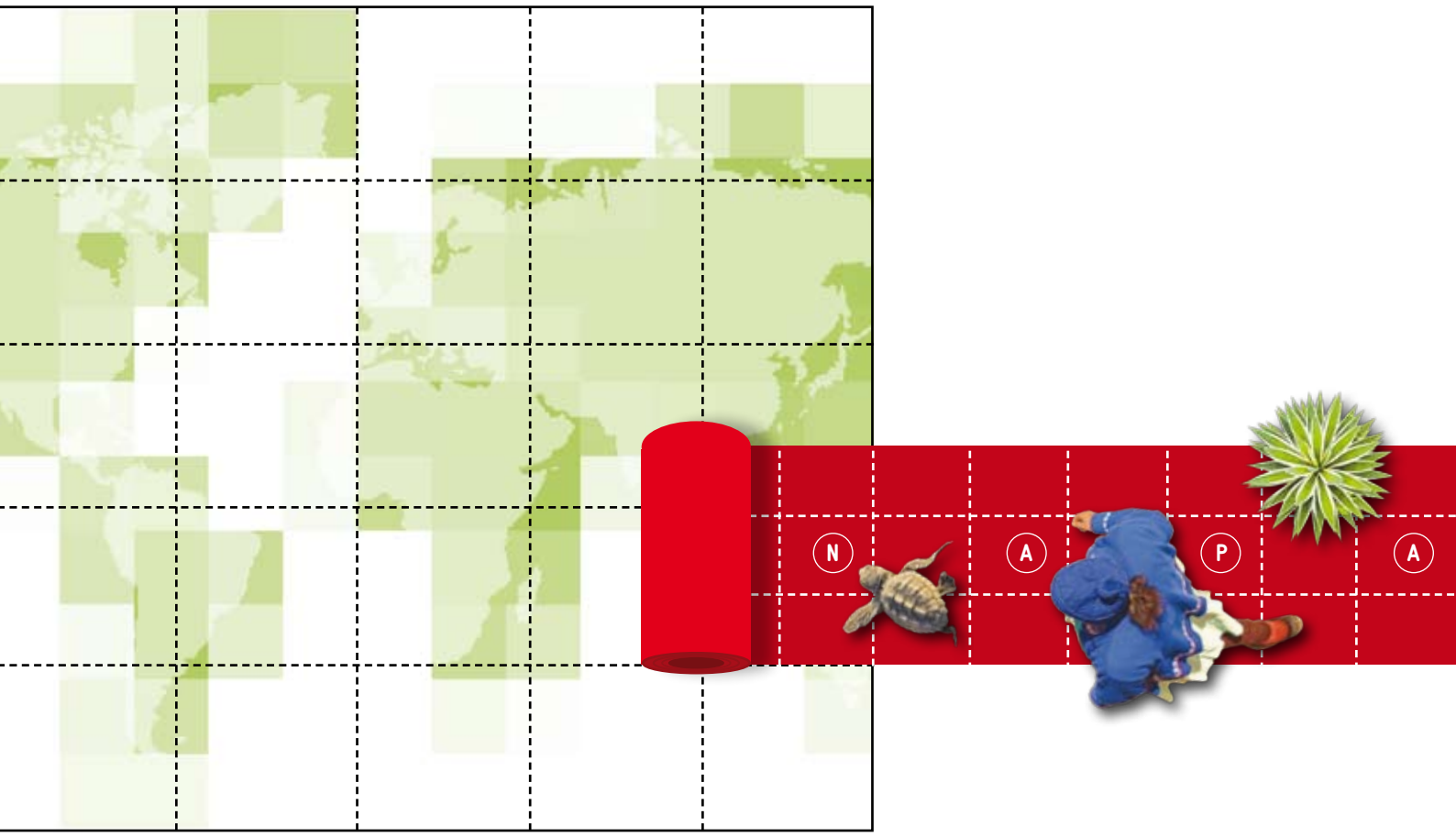

Planning to Deliver: Making the Rio Conventions more Effective on the Ground

Climate Change, Biodiversity, Desertification

gtz

On behalf of
Federal Ministry
for Economic Cooperation
and Development

Imprint

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Berlin

Photos
cover, p. 5: chris74 - fotolia.com
cover, p. 7: Eky Chan - fotolia.com
cover, p. 13: Benjaminet - fotolia.com

Printed by
KlarmannDruck,
Kelkheim

Eschborn, June 2009

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Preface

Sustainable development depends on intact ecosystems and their services. This is why environmental protection in the context of sustainable development is a key concern in development cooperation. Multilateral Environmental Agreements (MEAs) address global environmental challenges, and national action plans are often the means for implementation in individual countries. German development cooperation has been strongly involved in supporting implementation of such action plans, especially under the Rio Conventions dealing with climate change, combating desertification and biodiversity conservation but also in international frameworks concerning the forest sector.

It is through this practical experience that we have learned that national action plans can only be effective if they are the result of nationally coordinated and owned processes. Only if they are taken on board by national governments rather than being driven solely through the logic of an individual international policy process can they fulfill their promise. The instrument of national action plans is currently being debated; this report provides insight and analysis for the ongoing discussion.

The German Ministry for Economic Cooperation and Development welcomes this debate with a view to further improve implementation of national action plans. Creating ownership throughout national governments remains a major challenge and central objective of German cooperation. We therefore hope that this document in front of you will foster discussion and contribute to more effective national action plans.

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Executive Summary

As multilateral environment agreements struggle to prove their effectiveness on the ground, national action plans have emerged as a popular tool to identify national options for implementation of global agreements. A number of such plans have been drawn up over the last few decades – including the National Biodiversity Strategies and Action Plans (NBSAPs), UNCCD National Action Plans (NAPs) and the National Adaptation Plans of Action (NAPAs) under the three Rio conventions. Most of these plans have a common overall goal (promoting sustainable development) and invoke similar principles for formulating and implementing the action plans: participatory processes, overall coherence, effectiveness and accountability. However, the NAPs appear to have had limited success in realising the expectations of the global community, and more importantly, of national stakeholders.

A key reason for this appears to be that global and national expectations from NAPs are neither synergistic nor, oftentimes, realistic. Developed countries expect the NAPs to identify national options for implementing MEA commitments while promoting 'good governance' aimed at sustainable development – including decentralized governance and mainstreaming of national environment and development policies, programmes and institutions. In addition to identifying national actions for implementing MEA commitments, developing countries expect the national action plans to deliver international financial assistance to implement the plans.

At one level, therefore, NAPs are expected to be an intensely national stocktaking process. At the same time they are meant for submission to the global community, linked with the strong expectation that global funds from multilateral and bilateral sources will be forthcoming for implementation of the activities described in the plans.

If national planning exercises are viewed as an elaborate fund raising exercise, their potential for developing a national road map in consultation with a wide range of stakeholders may not be fully internalised. A formulaic approach is adopted to tick all the right boxes to meet requirements and donor expectations, instead of developing or building upon processes suited to national circumstances. The logic behind these exercises is derived from seperate international policy processes not as a way of integrating environmental concerns into national policies. At the national level this leads to parallel processes with considerable amount of overlap or even duplication. Instead of linking up with similar existing processes to bolster chances of collective success, there is an incentive to create and sustain new planning exercises to target many possible sources of international funding, in the hope that one may deliver better than the other. Instead of working to convince key government sectors and departments whose support NAPs would need if they relied on national budgets (such as finance and planning) of the benefits of mainstreaming and implementing MEA commitments, the national planning processes focus on convincing potential donors

If the funds don't eventually materialize (as is most often the case), then the whole national planning exercise yields little compared to investments and potential. Implementation is reduced to individual projects which generally address symptoms rather than root causes (such

as the lack of capacity to conduct and implement national planning), and may not contribute very much in the long term to addressing the problem.

To some extent, the international development community has already recognised the importance of establishing funding mechanisms that allow countries to decide their own priorities, and to promote better national ownership. Promoting ownership, alignment, harmonisation of aid, managing for results and mutual accountability in addition to increasing the amount of funds available in the global kitty, and the need to shift donor assistance from individual, disconnected projects towards integrated support are reflected in the 2002 Monterrey Consensus on Development Finance and the 2005 Paris Declaration on Aid Effectiveness. The environment community, however, has been slower in recognizing the need for this change.

National action planning processes also face a number of challenges at the national and sub-national levels. Common problems include planning processes that are overly-ambitious and lack a clear road map; inability to meaningfully engage key development sectors and processes, hence functioning at the margins of 'real' problems while losing out on opportunities to maximise effectiveness of limited funds; lack of high level involvement and leadership; 'flash-in-the-pan' processes with limited or no preparation and follow-up; a formulaic approach to participation; difficulties in translating national strategies into local-level action as well as in taking local concerns on board national level strategies; and insufficient attention to the identification of clear benchmarks and the establishment of participatory monitoring processes.

Many of these are related to the lack of funding and capacity. Building the necessary capacities needs to be part of the process. A clearer idea of the funds available for implementation at the outset could help towards better planning and attention to detail regarding funding, implementation and monitoring. While the need for additional global funding is clear, there are several options for maximizing the effectiveness of existing sources of funding at the national level, including for instance: pooling resources for all national planning exercises (including development planning exercises that are often better funded) to address common elements such as capacity building; internalizing plans into national planning and budgetary processes to ensure consistency of goals; better harmonization of donor funding; and greater involvement of the private sector. The plans should be used to spur local-level action based on new synergies and linkages where possible, without waiting for some sort of international 'go-ahead' through the provision of funds.

Experience with the Rio convention NAPs shows that a national planning exercise is more likely to succeed if the need for such planning processes is fully internalized, and viewed as an opportunity to create and strengthen cross-sectoral, decentralized and participatory planning that promotes ownership at every level, rather than the production of a wish list entirely reliant on external funding. To enable this to happen, the global community should shift its focus on establishing better systems of accountability than micromanagement at the point of disbursement. Accountability for the use of global funds should be sought through the establishment of more democratic global funding mechanisms where recipients as well as donors agree on targets and methodologies, as well as more effective monitoring systems that include reporting from all stakeholders. In addition, the global community should focus on strengthening civil society in order to empower people to hold their own governments accountable.

1 Introduction

Almost two decades after their inception, the three Rio conventions adopted at the 1992 UN Conference on Environment and Development are struggling to prove their effectiveness in bringing about changes on the ground.

The UN Framework Convention on Climate Change (UNFCCC), the UN Convention on Biological Diversity (UNCBD) and the UN Convention to Combat Desertification (UNCCD) have undoubtedly scored some successes in promoting global cooperation to address global environmental problems. In most cases they have stimulated scientific research and resulted in better awareness and understanding of the complexity of specific issues, as well as of the underpinnings of sustainable development. The three UN conventions have often resulted in capacity building of government and non-government agencies, and in some cases stimulated financial resources for developing countries and national policy formulation.

However, some might say that national implementation of agreements and commitments – the vital touchstone of success – have proven largely elusive. The time has come, analysts agree, to shift focus from negotiations and treaty-creation to action and implementation[1].

How is this best achieved? Negotiating verifiable targets, providing financial and technical support where needed and then leaving it up to the parties to show results in some cases, particularly where technological solutions exist (as in the case of the Montreal Protocol). However, this approach cannot be employed for addressing problems such as biodiversity conservation, or sustainable land management, or adaptation to climate change – or indeed, achieving sustainable development or poverty alleviation.

In such cases, no one technological fix is available and complex solutions need to be tailored to suit, among others, local-specific social, cultural, demographic, geographic, economic and ecological circumstances. One of the tools for identifying national implementation options – particularly for developing countries who wish to access international funding – then appears to be the national action plan (NAP).

Over the last few decades, there has been frenzied activity around drawing up national strategies and action plans for addressing development and environment concerns, particularly in developing countries. Agenda 21 called for the formulation of National Sustainable Development Strategies (NSDS). The UNCBD called for National Biodiversity Strategies and Action Plans (NBSAPs). UNCCD called for National Action Plans (UNCCD NAPs). The World Bank initiated the formulation of Poverty Reduction Strategy Plans (PRSPs), and the Global Environment Facility (GEF) has funded National Capacity Self Assessments

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[1] *A. Najam, M.Papa and Taiyab. N (2006). Global Environmental Governance – A Reform Agenda. International Institute for Sustainable Development, Manitoba*

(NCSAs). The UNFCCC has called on Least Developed Countries (LDCs) to prepare National Adaptation Plans of Action (NAPAs) and the Stockholm Convention on Persistent Organic Pollutants calls on all parties to formulate National Implementation Plans (NIPs).

Most of these plans have a common overall goal (promoting sustainable development) and invoke similar principles for formulating and implementing the action plans: participatory processes, overall coherence, effectiveness and accountability. However, the success of national action plans as an effective global tool to identify and implement national action to achieve internationally agreed goals still remains to be established.

To begin with, there appears to be some confusion about the intention of the national plan exercise. In GEF parlance, national action plans under the CBD and UNFCCC are 'enabling activities' to achieve internationally agreed or negotiated goals. Developed countries expect the NAPs to identify national options and priorities for implementing MEA commitments while promoting 'good governance' aimed at sustainable development – including decentralised governance; mainstreaming of national environment and development policies, programmes and institutions; informed decision-making, awareness raising; and identification of roles and responsibilities. In addition to identifying national actions for implementing commitments from Multilateral Environmental Agreements (MEA), developing countries expect the national action plans to deliver international financial assistance to implement those actions. To what extent are these expectations synergistic and to what extent have NAPs been able to fulfil these purposes?

Secondly, even a casual review of the performance of the national plans on the ground *(see Annexes for case studies)* reveals that actual implementation has been minimal. A key reason appears to be that developing countries lack the capacities and resources for planning, leave alone implementation. This would indicate that MEAs can expect to have little impact on the ground unless they are able to cooperate closely with other environment and development processes to ensure that a basic level of development is reached and the required capacities and resources are available. The building of this capacities and provision of resources is a fundamental problem that cannot be solved in isolation to meet the limited goals of any one specific MEA alone – it has to go hand in hand with other development and environment efforts at the international as well as national levels. Trying to address one problem (climate change, desertification or biodiversity in this case) in isolation from each other and from other development processes is like treating a symptom while choosing to ignore a rather obvious root cause. Although initial efforts to 'mainstream' development and environment goals at the international level have begun, they are insufficient to meaningfully address the problem, just as they have been insufficient at the national level in many developing – and developed – countries.[2]

Given that the national action plan route has been very recently deployed by the UNFCCC and may be used again (for instance, for the formulation of national adaptation strategies by

[2] *E.g. OECD (2009), Policy Guidance on Integrating Adaptation to Climate Change into Development Co-operation. Paris.*

all developing countries for accessing further funding under the UNFCCC, and during the revision of CBD NBSAPs), this analysis explores some of the lessons learnt from the national planning exercises under the three Rio conventions and recommends ways to improve their effectiveness.

Section 2 briefly reviews the history of the NAPs under the three conventions and based on existing literature, reviews lessons learnt. Section 3 revisits global expectations from the national planning exercise and explores their synergies, while Section 4 lists key global and national elements for successful national planning processes. The conclusions recap key challenges at the global and national level that should be urgently addressed before any future national planning exercises are launched.

2 Lessons From History

This section briefly reviews the history of national action plans under the CBD, UNCCD and UNFCCC, and lessons learnt. The CBD and UNCCD opted for the preparation of national action plans at the very start of the negotiation process, in the main convention texts. While the CBD requires both developed and developing country parties to prepare NBSAPs, the UNCCD NAPs have been mainly prepared by developing country parties. NAPAs, meanwhile, arrived later in the UNFCCC process and are applicable only to LDC parties.[3]

2.1 National Biodiversity Strategies and Action Plans

The initial focus of the NBSAPs, when they were first recommended by an Ad Hoc Working Group of Legal and Technical Experts on Biological Diversity in February 1990 while the text of the CBD was still being negotiated, was meant to be country studies on *the costs, benefits and unmet needs for conservation and sustainable use of biological diversity.* However, based on experience gained from the preparation of 10 country studies which were completed in January 1992, the focus of NBSAPs was shifted from quantifying the unmet financial needs of nations to the compilation of biological and economic data to reinforce the biodiversity planning process within countries.[4]

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[3] *Article 9 of the UNCCD calls on affected developing country Parties and any other affected country Party in the framework of its regional implementation annex or, otherwise, that has notified the Permanent Secretariat in writing of its intention to prepare a national action programme, shall, as appropriate, prepare, make public and implement national action programmes, utilising and building, to the extent possible, on existing relevant successful plans and programmes, and sub-regional and regional action programmes, as the central element of the strategy to combat desertification and mitigate the effects of drought.*

[4] *http://www.cbd.int/doc/meetings/sbstta/sbstta-01/information/sbstta-01-inf-03-en.pdf*

Article 6 of the CBD calls on all parties to (a) *develop national strategies, plans or programs for the conservation and sustainable use of biological diversity or adapt for this purpose existing strategies, plans or programs which shall reflect, inter alia, the measures set out in this Convention relevant to the contracting party concerned; and (b) Integrate, as far as possible and as appropriate, the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans, programs and policies.*

The process of preparing NBSAPs was initiated at the second Conference of Parties (COP2) of the CBD in 1995 with arrangements for the GEF to provide adequate resources to developing countries to prepare the NBSAPs. Although there were no formal set of guidelines for the preparation of the NBSAPs at that stage, the COP had endorsed third-party guidelines (such as the 1993 UNEP guidelines; guidelines developed by WRI, IUCN and UNEP in 1995;[5] and *A Guide for Countries preparing National Biodiversity Strategies and Action Plans* developed in 1999).[6] In addition, a number of support activities have been carried out to guide and facilitate the preparation of the NBSAPs. For instance, the GEF funded a UNDP/UNEP Biodiversity Planning Support Programme (BPSP) for capacity building in the preparation and implementation of the NBSAPs.

The capacity building modules prepared under the BPSP clearly spell out that the national action plans under the NBSAPs are not meant to be a list of intended projects, but are meant to *identify those issues that the country needs to undertake at the policy level. These can include: new or amended legislation; administrative regulations and procedures; reform or strengthening of institutions; mandates to be given to governmental, scientific or civil society bodies to carry out specific activities. It should also include translating these policy measures into a set of programmes, detailing both the costs and the benefits of each.*[7]

The end result of the NBSAP process is therefore not meant to be just a document. The real 'products' are meant to be the principles, priorities, policies, instruments and programmes that are identified to achieve the objectives of the CBD.

The guidelines emphasise that NBSAPs are expected to include an overall national strategy as well as specific plans for action. In addition they are expected to be, *inter alia*, open, participative and transparent to promote joint ownership by all stakeholders; establish permanent mechanisms to involve stakeholders; integrate with relevant sectoral or cross-sectoral plans, programmes and policies; set (or adapt) measurable targets, and identify indicators of success;

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[5] *Miller, Kenton. R. and Steven M. Lanou. (1995). National Biodiversity Planning: Guidelines Based on Early Experiences Around the World. World Resources Institute, United Nations Environment Programme and The World Conservation Union. Washington DC; Nairobi; Gland, Switzerland.*

[6] *Hagen, R.T (1999). A Guide for Countries preparing National Biodiversity Strategies and Action Plans. UNDP-BPSP.*

[7] *GEF, UNEP and CBD 2007. The Biodiversity Planning Process: How to prepare and update a National Biodiversity Strategy and Action Plan. Module B-2. Version 1. July 2007*

and be long-term, cyclical and adaptive, so they can be periodically revised in the light of the experience of implementation.

Based on experiences of countries and the recommendations of an ad hoc Working Group on Review of Implementation, the COP has frequently issued further guidance on developing the NBSAPs. For instance, at COP8 a set of voluntary guidelines to parties for review of NBSAPs were included in an annex to Decision VIII/8.[8] At COP9 in 2008, further guidance was issued on developing NBSAPs, urging governments to ensure among other things that the plans are *action-driven, practical and prioritised*, mainstreamed with sectoral or cross-sectoral plans, programmes and policies; and promote synergies with poverty reduction efforts.[9]

Key Experiences from the NBSAP Process

As of 2008, 160 Parties (out of a total of 191) had finalised their NBSAPs, and of these 12 countries had revised the plans to include the global target adopted by COP6 in 2002, of achieving *by 2010 a significant reduction of the current rate of biodiversity loss at the global, regional and national level as a contribution to poverty alleviation and to the benefit of all life on earth.*[10] Despite the detailed guidance that has developed over the years, most the developing country NBSAPs ran a rocky road in the making, and faced an even more difficult task in implementation.

Planning

In countries where large sections of the population depend upon biodiversity for livelihood in one form or the other, discussions on the issue can be extremely sensitive. Stakeholders – including indigenous communities, government agencies and departments, the private sector, the scientific community, donor agencies and civil society organisations – usually hold diverging views on biodiversity ownership, access and user rights often depending on which end of the sustainable development spectrum they come from. Bringing these stakeholders together to agree on a common strategy and action plan can pose a considerable challenge.

The first step to successful national planning, therefore, is often to establish channels of communication among stakeholders with divergent views and interests. The broader the involvement of stakeholders in developing the national plan, the stronger the eventual ownership of the national plan is likely to be. Unfortunately, in most cases NBSAPs failed

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[8] *CBD (2006). Decision VIII/8. http://www.cbd.int/decisions/?m=COP-08&id=11020&lg=0*

[9] *CBD (2008). Decision IX/8. http://www.cbd.int/nbsap/guidance.shtml. A summary of COP decisions providing guidance on NBSAPs can be found at http://www.cbd.int/recommendations/wgri-recs.shtml?m=WGRI-02&id=11449&lg=0*

[10] *CBD (2002). COP 6 Decision VI/26. The Hague, 7-19 April. http://www.cbd.int/decisions/?m=COP-06&id=7200*

to bring these stakeholders together and the overall range and depth of participation in the preparation of NBSAPs was found to be poor and insufficient to ensure effective ownership or ensure mainstreaming beyond the biodiversity community.[11]

Getting the balance of representation right proved challenging in many countries. An overly technical process and the presence of too many government officials on steering committees and working groups resulted in too little representation of local and indigenous community representatives in some countries.[12] In at least one case (India), meanwhile, the first NBSAP draft was coordinated by an NGO and prepared through a participatory process that focused mainly on bringing on board the views of vulnerable communities, without ensuring political buy-in or the involvement of the private sector. As a result of the lack of support from the government and other powerful lobbies, the draft was eventually rejected *(see box: India's NBSAP experience).*[13]

The NBSAPs did not generally succeed in engaging all major stakeholders – particularly mainstreaming the issue into action of government departments, local communities, women, and the private sector. The preparation process was dominated by biodiversity specialists and nature conservation organisations, without the capacity to engage economic sectors and forge links with mainstream development planning.[14]

Insufficient preparation before the NBSAP consultations affected the quality of participation in many cases. The existing constituency supporting biodiversity conservation is often narrow, calling for awareness-raising efforts to bring the public and decision makers 'up to speed' for effective participation in the discussions. Even the existing constituency for biodiversity conservation often needs more information to understand the concerns of other stakeholders – for instance, marginalised groups whose livelihoods depend on natural resources.

However, capacity and resources were often insufficient to generate and disseminate relevant information before and during the process. Information on, among other things, the scientific, social, economic and policy aspects of biodiversity was often lacking and was a common hurdle to meaningful participation.[15] Communication strategies were integrated into only a

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[11] *CBD (2007). Synthesis and Analysis of Obstacles to Implementation of National Biodiversity Strategies and Action Plans: Lessons Learned from the Review, Effectiveness of Policy Instruments and Strategic Priorities For Action. UNEP/CBD/WG-RI/2/2/Add.1. 16 May.*
http://www.cbd.int/doc/meetings/wgri/wgri-02/official/wgri-02-02-add1-en.pdf

[12] *Pisupati, B. (2007). Effective Implementation of NBSAPs: Using a decentralised approach. UNU-IAS.*
http://www.ias.unu.edu/resource_centre/Effective%20Implementation%20of%20NBSAPs%20-%20Pisupati.pdf

[13] *Apte, T. (2006). A People's Plan for Biodiversity Conservation: Creative Strategies that Work (And Some that Don't). IIED Gatekeeper Series 130.*

[14] *Swiderska, K. (2002). Mainstreaming biodiversity in development policy and planning: A review of country Experience. IIED.*

[15] *ibid*

minority of NBSAPs, and insufficient attention and effort was invested in awareness-raising, particularly on the impact of the process and its outcomes on various stakeholders.[16]

Restrictions on participation were also placed by time constraints imposed by governments or donors.[17] Most countries had about 18 months to prepare their NBSAPs.[18] Size and diversity posed a further challenge to participatory planning in larger countries. To some extent, this problem was sought to be overcome through sub-national or provincial action plans – for instance, in the preparation of the NBSAPs in China and India.[19]

Another problem seems to have been the lack of continuity in the consultation process. One-off consultation meetings with no further feedback often left stakeholders confused and alienated from the final outcome.[20] The planning process in many countries missed the opportunity to retain capacity by establishing networks and systems for future implementation and monitoring.[21]

Many NBSAPs faced a problem in getting key and influential decision makers at the national as well as local levels to 'buy in' to the planning process. High-level involvement of key players, sectors and departments was lacking in the consultation process. Some countries sought to remedy this by seeking parliamentary ratification.

Finally, the lack of predictable financing for implementation also affected the planning process in developing countries. A better idea of the amount of secure funding available for implementation from domestic and international sources could help to keep the planning process realistic, and allow for better prioritisation.

A key lesson from the NBSAP planning process is that the planning stage plays a key role in the eventual outcome of the action plan. In addition to contributing to awareness raising and education, it can lay the foundation for mechanisms and infrastructure for participation and

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[16] *Apte, T. (2006). A People's Plan for Biodiversity Conservation: Creative Strategies that Work (And Some that Don't). IIED Gatekeeper Series 130.*

[17] *CBD (2007). Synthesis and Analysis of Obstacles to Implementation of National Biodiversity Strategies and Action Plans: Lessons Learned from the Review, Effectiveness of Policy Instruments and Strategic Priorities For Action. UNEP/CBD/WG-RI/2/2/Add.1. 16 May.*
http://www.cbd.int/doc/meetings/wgri/wgri-02/official/wgri-02-02-add1-en.pdf

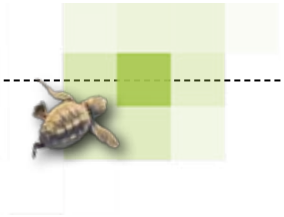
[18] *Anon (undated). National Biodiversity Strategies and Action Plans (NBSAPs) in Southeast Asia : Experiences and Lessons*

[19] *Pisupati (2007)*

[20] *Anon (undated). National Biodiversity Strategies and Action Plans (NBSAPs) in Southeast Asia : Experiences and Lessons*

[21] *Swiderska, K. (2002). Mainstreaming biodiversity in development policy and planning: A review of country Experience. IIED.*

consultation during the implementation and monitoring stages, including the formation of networks.[22] More importantly, the planning process can spur local action irrespective of the fate of the final product (see box: India's NBSAP experience).



Implementation

NBSAPs are described as the cornerstone of national implementation of the CBD. The process has had some positive outcomes: the consultations have helped to raise awareness; spark off local action in some cases; and even resulted in the introduction of new policies. On the whole, however, the NBSAPs have been described as *little more than unprioritised lists of projects for international funding, aimed more at international donors than a national audience… very few action plans emphasise domestic resource mobilisation. The majority aim to conserve biodiversity through a project-based approach, rather than proposing national policy and institutional changes.*[23]

Shortcomings in the planning process have come back to haunt the NBSAPs: responding to the ambitious expectations attached to them, most of them were far too ambitious in trying to define a comprehensive strategy and plan. As a result, they failed to prioritise action and elaborate the mechanisms and responsibilities for implementing these actions.[24] Governments have been described as being 'frozen into inaction' after the planning process, without a roadmap for implementation and without the necessary financial, technical and human resources for implementation. International sources of finance have been limited,[25] and NBSAPs were not sufficiently internalised to draw from national budgets.

As a result, whatever momentum and capacity was built in the planning process risked being lost in the aftermath. Implementation was reduced to a few actions or projects for which funds did become available.

According to a 2007 analysis, NBSAP implementation also suffered from too much emphasis on national-level planning, with insufficient involvement of local actors despite the fact that it is at the local level that day-to-day decisions regarding the fate of biodiversity are made. As a result, the process was not very successful in integrating local-level needs and demand within the broad priorities of the NBSAP, or in translating national level strategies into local

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[22] *Pisupati (2007) and Apte (2006)*

[23] *CBD (2007). Synthesis and Analysis of Obstacles to Implementation of National Biodiversity Strategies and Action Plans: Lessons Learned from the Review, Effectiveness of Policy Instruments and Strategic Priorities For Action. UNEP/CBD/WG-RI/2/2/Add.1. 16 May. http://www.cbd.int/doc/meetings/wgri/wgri-02/official/wgri-02-02-add1-en.pdf*

[24] *Swiderska, K. (2002). Mainstreaming biodiversity in development policy and planning: A review of country Experience. IIED.*

[25] *CBD (2007)*

level action.[26] Many of the NBSAPs resulted in an overly prescriptive process that is not finely tuned to the specific needs, capacities and opportunities of sectoral and local agencies.[27]

The analysis suggests sub-national plans as the next step in the NBSAP process to create more local-level involvement and allow for local-level prioritisation. Sub-national plans have other benefits: lower human, institutional, administrative and financial resources than coordinating national implementation; improved opportunities for coordination between government departments and stakeholders; and fewer impediments to implementation as sub-national plans tend to be better internalised by sub-national governments.[28] They would also allow for greater involvement of local politicians and local-level governance structures, to help them recognize the importance of biodiversity in development planning. Lessons learnt at the sub-national level could then feed into a national framework and policy.

Mainstreaming and integration into national planning processes proved a key challenge for most NBSAPs.[29] The documents themselves generally limit themselves to listing key sectors for greater integration, without identifying specific links to sectoral plans and policies, and developing specific guidelines, mechanisms and practical approaches on how this integration can be achieved.

A call for mainstreaming in developing countries that comes from the international community via national environment departments is often still viewed with suspicion by key government sectors in developing countries. They fear that linking crucial development processes to commitments under environment conventions could result in conditionalities and demands that could compromise development.[30]

In the absence of immediate incentives, the choices can be more difficult in the case of biodiversity management - often between a pressing immediate need and future benefit. For instance, communities or governments could be left with a choice between a new hydroelectric power station to address energy needs on the one hand, but have serious impacts on biodiversity and local livelihoods on the other. To complicate matters, the beneficiaries from the power station are usually not the same as the communities losing their habitat and livelihoods. In

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[26] *Pisupati, B. (2007). Effective Implementation of NBSAPs: Using a decentralised approach. UNU-IAS. http://www.ias.unu.edu/resource_centre/Effective%20Implementation%20of%20NBSAPs%20-%20Pisupati.pdf*

[27] *CBD (2007).*

[28] *Pisupati, B. (2007). Effective Implementation of NBSAPs: Using a decentralised approach. UNU-IAS. http://www.ias.unu.edu/resource_centre/Effective%20Implementation%20of%20NBSAPs%20-%20Pisupati.pdf*

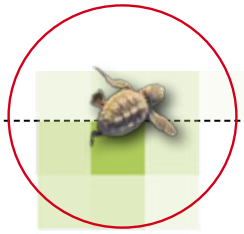
[29] *CBD (2007). Synthesis and Analysis of Obstacles to Implementation of National Biodiversity Strategies and Action Plans: Lessons Learned from the Review, Effectiveness of Policy Instruments and Strategic Priorities For Action. UNEP/CBD/WG-RI/2/2/Add.1. 16 May. http://www.cbd.int/doc/meetings/wgri/wgri-02/official/wgri-02-02-add1-en.pdf*

[30] *ibid*

the absence of sufficient information to weigh in the social and economic value of ecosystem services, livelihood opportunities and the costs of biodiversity loss, or even information on how to minimise losses, it becomes very difficult to convince key development sectors to decide in favour of local livelihoods or biodiversity.

Poor communities themselves are often opposed to efforts towards mainstreaming biodiversity and development concerns because in their experience such efforts have often resulted in greater restrictions in accessing biodiversity resources that are crucial to their livelihoods. Whereas the links between biodiversity and poverty reduction are widely recognised in theory, not much attention is paid to them in practice. Although development agencies have made efforts to promote development-oriented conservation, much of the literature and guidance on NBSAPs and biodiversity mainstreaming focuses on linking biodiversity with economics, and preserving threatened species, placing much less emphasis on the importance of biodiversity to local livelihoods.[31]

The inability of the NBSAP processes to bring on board key stakeholders (vulnerable communities as well as powerful political and private sector lobbies); lack of sufficient information to convince other sectors of the importance of biodiversity and remove suspicions regarding mainstreaming; and lack of coordination among government departments resulted in lost opportunities for identifying common goals and opportunities, while balancing interests.



Monitoring

An assessment of the (individual and overall) effectiveness of the NBSAPs is difficult due to the lack of clear quantitative and measurable targets, and the inclusion of tools for monitoring progress. Although the CBD adopted the 2010 global target, this was not internalised by most of the NBSAPs.

COP9 calls on parties to *establish national mechanisms including indicators, as appropriate, and promote regional cooperation to monitor implementation of national biodiversity strategies and action plans and progress towards national targets…, to allow for adaptive management, and provide regular reports on progress….*[32]

An emphasis on stakeholder-driven monitoring and review processes is essential to ensure that local as well as national goals for biodiversity conservation are met. Parties are now in the process of preparing their fourth national reports to the CBD. The guidelines for the preparation of the national reports request the inclusion of a report on progress in implementing NBSAPs and

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[31] *Swiderska, K. (2002). Mainstreaming biodiversity in development policy and planning: A review of country Experience. IIED.*

[32] *CBD (2008). Decision IX/8. http://www.cbd.int/nbsap/guidance.shtml*

on mainstreaming them.[33] This presents an opportunity to re-engage stakeholders through an open, transparent and participatory reporting process, and give them an opportunity to voice their opinion on the past and future performance of the NBSAPs.

India's NBSAP Experience

India's NBSAP experience holds several lessons for similar planning exercises around the world. The Indian Ministry of Environment and Forests (MOEF) entrusted the task of coordinating the NBSAP to a non-governmental organisation, and accepted their proposal for a large-scale decentralised process across all states of India. As a result, a diversity of innovative tools and strategies were employed to reach out to thousands of people nationwide between 2000 and 2003, enabling more than 70 state, sub-state, eco-regional and thematic plans to be prepared, in addition to one national plan. Each plan was meant to be an independent, stand-alone document that would be directly referred to for implementation of strategies and actions in the concerned area. Key elements from all plans were finally integrated by the Core Group into a single National Biodiversity Strategy and Action Plan (NBSAP).

The consultation process was regarded as important as the final product, and based on the central tenet that planning for biodiversity conservation should be owned and shaped by as many individuals as possible in an equitable process that allows the most marginalised voices to be heard, especially those whose livelihoods depend on natural resources. Regardless of what might come out of the final plan, the process itself was meant to increase awareness of biodiversity, empower people through participation, inspire local initiatives to begin implementation of local plans, etc.

The decentralised planning process was successful in mobilising people to innovate and experiment with tools to reach out to a cross-section of stakeholders. Every state developed a different method of reaching out to stakeholders, and made independent choices about what planning tools and strategies to adopt – including, for instance, biodiversity festivals and radio programmes. As a result, the process was particularly successful at including the voices and views of marginalised social sectors, highlighting the importance of identifying appropriate tools to target specific sectors.

The process also highlighted the importance of participants identifying with, and feeling ownership over, a process in order to participate meaningfully and value the output. In different contexts, ownership can hinge on a range of different things such as the type and timing of information disseminated to participants, the type of coordinating agency selected, the opportunity for teamwork, or the language used.

The process generated positive spin-offs in learning, networking, capacity building and local action. For instance:

• The Forest Department in Sikkim, in north east India, used the experience of coordinating the Sikkim planning process to subsequently design a participatory planning process for the conservation of medicinal plants.

• Also in Sikkim, garbage management and the reduction of yak grazing in Khangchendzonga National Park were among the plan priorities in Rathong Chu Valley. Implementation of both was taken up by the Forest Department and a local NGO.

• In Karnataka in south India, the planning process included a case study by a local NGO to assess the status of a polluted water tank in the town of Tumkur. Subsequently the NGO produced and distributed a booklet on the tank, and involved thousands of members of the public in a tank de-weeding programme.

The process managed to challenge the assumption that huge amounts of money are needed for such a process, and demonstrated what is possible to achieve with limited resources. One of the lessons was that contributions in the spirit of voluntarism can generate wider ownership of the process and the product, and can make the overall goals of the planning process more sustainable in the long-run. However, it should be noted that in the face of practical realities, trying to stretch resources (time, funds and human resources) to their limits also resulted in stressful situations.

The eventual fate of the NBSAP held yet another key lesson: when the three-year people-driven process was completed, the Ministry for Environment and Forests refused to approve the document prepared by the Core Group. The ministry was reportedly displeased with parts of the plan, including the statement that India's current development paradigm is environmentally unsustainable. It appointed a separate committee to review the plan, but did not allow the Core Group to access the findings of the committee. It also instructed the Core Group not to make the plan public which was ironic since it had been prepared through a national, public process.

Therefore, while governments may pay lip-service to participatory planning and decentralised governance, the political acceptability of 'uncomfortable' plan recommendations and observations can remain in doubt. This final outcome highlights the importance of incorporating a political strategy into such a process, to gain the support of powerful lobbies for securing official support for the final plan. The process lacked a political strategy, and made relatively little effort to take on board the power wielders: big sugarcane farmers, tea garden owners, industries, trade unions and politicians. The ministry could afford to suppress the plan because it was predominantly supported by 'marginalised' groups. Politically astute positioning, lobbying and creating a support base among powerful interest groups is equally important during the course of the decentralised planning process.

From Apte, T. (2006). A People's Plan for Biodiversity Conservation: Creative Strategies that Work (And Some that Don't). IIED Gatekeeper Series 130.

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[33] *CBD (2007). Synthesis and Analysis of Obstacles to Implementation of National Biodiversity Strategies and Action Plans: Lessons Learned from the Review, Effectiveness of Policy Instruments and Strategic Priorities For Action. UNEP/CBD/WG-RI/2/2/Add.1. 16 May.*
http://www.cbd.int/doc/meetings/wgri/wgri-02/official/wgri-02-02-add1-en.pdf

2.2 UNCCD National Action Plans

Like the CBD, the UNCCD calls for the preparation of National Action Plans as a basis for local implementation. According to Article 9 of the convention, affected parties *shall, as appropriate, prepare, make public and implement national action programmes, utilising and building, to the extent possible, on existing relevant successful plans and programmes, and sub-regional and regional action programmes, as the central element of the strategy to combat desertification and mitigate the effects of drought. Such programmes shall be updated through a continuing participatory process on the basis of lessons from field action, as well as the results of research. The preparation of national action programmes shall be closely interlinked with other efforts to formulate national policies for sustainable development.* Article 10 of the convention goes on to elaborate on the purpose and scope of the NAPs.[34]

There are no formal set of guidelines for elaborating the NAPs, although the convention text and its five Annexes include a number of criteria. Like the NBSAPs, the NAP process is also meant to be continuous, adaptive, flexible and participatory, the start of a unified long-term policy for sustainable land management with opportunities for stakeholders to develop their own initiatives and ideas. The process is meant to be bottom-up, incorporating lessons from field action as well as research results. It is meant to be integrated with other efforts to formulate national policies for sustainable development. Over the years, decisions taken by the COP and Committee for the Review of the Implementation of the Convention (CRIC) have added additional guidance for the preparation of the NAPs stressing, among other things, participation, mainstreaming and resource mobilisation.

As in the case of the NBSAPs, some countries such as Namibia have chosen to interpret the UNCCD NAP as a rolling planning programme rather than a formally documented, static NAP. [35]

Key Experiences from the UNCCD NAP Process

Although the UNCCD has the support of even more parties (199) than the CBD (191) or UNFCCC (189), it has been rather narrowly viewed from the very start as a convention dealing with a developing country, rather than global, problem. This has limited its scope and potential as the "one true sustainable development Convention" that deals directly with sustainable land management and poverty reduction,[36] issues that are very at the heart of

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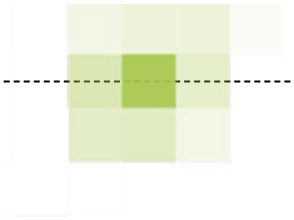
[34] *UNCCD(1992??). Text of the United Nations Convention to Combat Desertification. Part III, Action Programmes, Scientific and Technical Cooperation and Supporting Measures. http://www.unccd.int/convention/text/convention.php?annexNo=-3*

[35] *Lindsay C. Stringer, Mark S. Reed, Andrew J. Dougill, Mary K. Seely and Martin Rokitzki / Natural Resources Forum 31 (2007) 198–211*

[36] *Sporton, D. and Stringer, L. (undated draft). Defining the UNCCD's comparative advantage in current international architecture (1) - international perspective.*

achieving sustainable development in poor economies mainly dependant on agriculture and natural resources. The convention has neither been fully accepted by the global environmental community (for instance, its activities were initially not accepted as eligible for GEF funding) nor the development community (for instance, it has not succeeded in becoming a forum for addressing 'hard' development issues such as land rights) and appears to be stuck in a twilight zone, with likely implications for slower national implementation. This is likely to change in the future as the key role of sustainable land management in climate change adaptation is increasingly recognised.



Planning

The UNCCD was one of the first conventions to strongly emphasise the need for a bottom-up and participatory approach in tackling desertification and land degradation. It did not, however, go so far as to define exactly what a bottom-up approach is and what participation should entail. Whereas this allows flexibility for countries to define participation in a manner that is sensitive to their national context, it also allows countries to meet their obligations without actually empowering poor and traditionally excluded communities, but, it is argued, this is less effective for implementation, as it is exactly these communities most directly related to the issue of desertification.[37]

In practice, the goal of a bottom-up and participatory approach leading to decentralisation has proved difficult to achieve. A 2007 analysis based on three case studies in Africa found that even after participatory processes were followed, in some cases NAPs ended up reflecting the concerns of the more powerful members of society while neglecting the views of the poorer, often marginalised sections, key land users in drylands.[38] This was either because the participants of the NAP consultations were commonly the more powerful community members who prioritised their own interests, or, in cases where marginalised sections were represented, they were inhibited from fully participating either due to local cultural and social norms and practices, or insufficient access to information and capacity.

Participatory approaches are also more difficult in countries lacking democratic systems, and with limited opportunities for civil society organisations (CSOs) to exist and flourish. In some countries, quasi-consultancy organisations or only NGOs vetted by the government are allowed to participate.

Under these circumstances, participatory mechanisms can end up reinforcing the advancement of the interests of the already powerful actors at the expense of the less powerful. The UNCCD NAPs do not generally acknowledge the politicised nature of land degradation. Solutions

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[37] *Stringer, L.C et al (2007). Implementing the UNCCD: Participatory Challenges. Natural Resources Forum 31, 198–211*

[38] *ibid*

rarely call for reforms in policy, legislative, institutional and incentive frameworks despite their significance on the decisions taken by the land-user. [39]

The analysis found that access to relevant and scientifically sound information by all stakeholders was another barrier to meaningful participation. The lack of appropriate institutional structures to disseminate this information in Botswana, one of the countries considered in the case study, caused long delays in the dissemination of research findings and gaps between researchers, national policy-makers, local communities and UN-supported projects. On the other hand, this problem was overcome in Namibia where a whole year was allowed for bringing all players to the discussion table and resources and effort were expended in bringing all the players up to speed on the nature of the problem and in understanding each others point of view. Greater institutional support for communication between stakeholders at the local level is therefore particularly important for effective community-based natural resource management initiatives *(see box: Lessons from Namibia)*.[40]

Creating this kind of information support infrastructure with adequate communication tools and taking the time to bring all players to the table at the start of the process is bound to be more time and resource consuming – particularly if the infrastructure is to be maintained beyond the NAP preparatory process. National and international actors are often unwilling to commit the necessary time and resources. A number of NAPs highlight the lack of financial resources to implement participatory approaches.[41]

Support to grassroots capacity building is also essential to ensure that local communities and groups contribute to the reporting process rather than external NGOs and consultants.[42] In addition, there are few opportunities at the national and international level for knowledge-sharing about best participatory practices.

The national plans, like the international UNCCD process, largely failed to involve private sector stakeholders - both, those responsible for many of the unsustainable practices that lead to land degradation (such as monocultures, mining, logging etc) as well as those able to invest in developing solutions (for instance, develop drought resistant seeds).[43]

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[39] *Global Mechanism (2005). Report of the Managing Director of the Global Mechanism of the UNCCD to the Seventh Session of the Conference of Parties.*
http://www.global-mechanism.org/dynamic/documents/document_file/cop7reportpub.pdf

[40] *Stringer, L.C et al (2007). Implementing the UNCCD: Participatory Challenges. Natural Resources Forum 31, 198–211*

[41] *Klemens Riha (2007). Desk Study on National Action Programmes (NAP) - Eight Case Studies from Latin America and the Caribbean. GTZ*

[42] *Sporton, D. and Stringer, L.C. (undated draft). Defining the UNCCD's comparative advantage in current international architecture (1) - international perspective.*

[43] *Klemens Riha (2007).*

Despite the direct link of sustainable land management issues with development concerns, most NAPs have not been very successful in mainstreaming UNCCD concerns in national governance or in making necessary links with other national and global development processes. Sustainable land management is a cross-cutting issue that has to be viewed in the broader context of sustainable development and poverty reduction. Largely reflecting the failure of the international process, UNCCD NAPs often do not succeed in mainstreaming anti-desertification activities within National Sustainable Development and Poverty Reduction Strategies, recognising synergies with current global environmental priorities such as climate change or taking into account conflict and mass migrations or the HIV/AIDS pandemic.[44] Whereas most NAPs acknowledge the link with poverty reduction, they have been elaborated as stand-alone action plans with few operational links with relevant social development strategies.[45]

At COP-8, the UNCCD adopted a *10-year Strategic Plan and Framework to Enhance the Implementation of the Convention (2008-2018)*, where the need for integration of NAPs and sustainable land management and land degradation issues into development planning and relevant sectoral and investment plans and policies is re-emphasised. Further guidance on how this can be achieved in practice is still missing. There have been some successes at the national level, however, which could point the way towards better mainstreaming. In Tunisia and Honduras, for instance, the fight against desertification is well integrated into the Tunisia five-year development plan and the Honduras National Strategy for Poverty Reduction respectively. National approaches and priorities are examined at the local level and translated into Local or Community Action Programmes with concrete measures and financial allocation.

As with participation, the lack of adequate information hampers efforts to achieve better mainstreaming. Some countries still lack the underlying analysis of the causes and effects of desertification as a complex interaction of human and natural factors. The UNCCD national processes do not seem to take into account the economic fallouts of desertification (including the costs of inaction and benefits of action) adequately.[46] This broad economic perspective is essential to engage other sectors, by making them aware of the links between desertification and their own interests.

The UNCCD NAPs have been described as 'wish-lists' that lack strategic vision and tools for implementation, listing what is hoped to be achieved one day in the future but without listing concrete measures of progress, strategies for obtaining the required resources, or indeed, any

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[44] *Sporton, D. and Stringer, L. (undated draft). Defining the UNCCD's comparative advantage in current international architecture (1) - international perspective.*

[45] *Global Mechanism (2005). Report of the Managing Director of the Global Mechanism of the UNCCD to the Seventh Session of the Conference of Parties.*
http://www.global-mechanism.org/dynamic/documents/document_file/cop7reportpub.pdf

[46] *Sporton, D. and Stringer, L. (undated draft). Defining the UNCCD's comparative advantage in current international architecture (1) - international perspective.*

idea of implementation costs.[47] This is not very different from the description of NBSAPs mentioned in the earlier sub-section: *unprioritised lists of projects for international funding, aimed more at international donors than a national audience.* Clearly, the two processes share a common problem.

Mainstreaming in Honduras

Nearly 35 per cent of the population in Honduras lives in areas highly vulnerable to drought. Land degradation increases the country's vulnerability to natural disasters. For instance, Hurricane Mitch devastated large parts of the country in 1998 – especially in areas where vegetation had been sufficiently degraded to allow floods and winds to develop their deadly power.

The country completed its UNCCD NAP in 2003 under strong leadership from the deputy Minister of Natural Resources. The NAP identifies five key areas of intervention: sustainable agriculture, watershed management, education, risk and disaster management, and institutional strengthening. It is very much a "living document" that was revised in 2007 to serve as a common reference for stakeholders.

Subsequently, the Grupo de Trabajo Interinstitucional (GTI, the interagency coordinating unit) has successfully ensured that desertification is part of the country's PRSP and that sustainable land management (SLM) practices are being mainstreamed into decentralized community-level planning processes. The main factors contributing to the success in mainstreaming include:

- **Political leadership:** A firm commitment from the deputy minister, with support from the Vice President, leant sufficient convening power and political support for GTI to ensure mainstreaming in the PRSP and the review of forestry legislation.
- **Coordination:** The GTI has achieved political weight and visibility and has strongly supported mainstreaming at the community and local level.
- **Impetus from the civil society:** Honduran civil society has been very active in support for SLM and has benefited from the general high degree of environmental awareness in the country.

Implementation

According to the Global Mechanism (GM), a subsidiary body of the UNCCD mandated to mobilise funds for UNCCD activities in affected developing countries, the eventual success of a NAP depends to a large extent on the 'process' of NAP elaboration – successful financing

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[47] *Sporton, D. and Stringer, L. (undated draft). Defining the UNCCD's comparative advantage in current international architecture (1) - international perspective*

and implementation has begun in countries where the process has led to increased ownership and commitment for tackling the root causes of desertification.[48]

Like the NBSAPs, the UNCCD NAPs have been able to capture the technical aspects of desertification, but many have been unable to translate the principles of the convention into a strategic and fundable programme of work.[49] In many cases, there are inconsistencies between the analysis of the root causes of land degradation and the proposed solutions, the latter usually documented as a list of projects.[50]

Many of the NAPs rely on National Coordinating Bodies (NCBs) to ensure interaction between departments, sectors and stakeholders. However, to begin with, not all stakeholders are represented adequately on the NCBs. Most NCBs lack a proper budget, and do not have validated guidelines or statutes. Roles and responsibilities are not adequately defined, and they lack high-level backing, functioning mostly at the technical level without too much influence on decision-making.[51] Sectoral ministries do not pay much attention to the NCBs or the NAPs – in no small measure due to the lack of financial resources to implement any follow-up activities.

The UNCCD has had a much harder time than the other two Rio conventions in garnering funds, with limited commitments from national and international sources. In a few countries, the NAPs are part of the national budget line, but the funds are usually limited or fail to be disbursed.[52] The focus of both, national and international sources has tended to be large-scale sectoral projects – for instance, national co-financing to support the formulation of GEF projects. Most international funding for the UNCCD is still channelled through the GEF, which also receives most attention as potential financing source.[53]

In 2005, the GM adopted a Consolidated Strategy and Enhanced Approach (CSEA) in response to the new international setting – including for instance, the adoption of the Millennium Development Goals, the Monterrey Consensus and the Paris Declaration of the High-Level Forum on Aid Effectiveness.[54] CSEA recognises that as a result of these developments, resource allocation procedures by international donor organisations and bilateral donor agencies will

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[48] *Global Mechanism (2005). Report of the Managing Director of the Global Mechanism of the UNCCD to the Seventh Session of the Conference of Parties.*
http://www.global-mechanism.org/dynamic/documents/document_file/cop7reportpub.pdf

[49] *ibid*

[50] *ibid*

[51] *Klemens Riha (2007). Desk Study on National Action Programmes (NAP) - Eight Case Studies from Latin America and the Caribbean. GTZ*

[52] *ibid*

[53] *ibid*

[54] *Global Mechanism (2008). The GM's Consolidated Strategy & Enhanced Approach.*
http://www.global-mechanism.org/about-us/strategyand-approach

increasingly favour budget support to governments, to allow for country leadership and the identification of country-driven development priorities. In such circumstances, where the level of finance for UNCCD implementation will depend increasingly on the political will of governments, it becomes even more important to articulate the relevance of SLM as a national priority. SLM concerns will have to compete for allocation of resources in a national "development market place" or align with other sectors.

In response, the GM has developed the concept of national Integrated Financial Strategies (IFS),[55] aimed at broadening the scope of planning processes beyond specific sectors, and coordination between different financing sources, instruments and mechanisms. The ultimate goal of these strategies is to better position the UNCCD in the development market place and identify potential entry points in national resource allocation.

Lessons from Namibia

Namibia took an early decision was taken to initiate a rolling planning program to combat desertification rather than a formally documented, static NAP. Linked to this program, four donor-funded, government based programs initiated participatory activities in north-western Namibia where a strong farmers' association was in existence.

Although aware of the loss of productivity and eager to participate in reversing the situation, it rapidly became clear that neither the community participants nor their service providers could address their own requirements while also integrating external donor and NGO interventions. All stakeholders agreed that capacity enhancement of the existing farmers' association was to combating desertification and to the development process in general, and the Forum for Integrated Resource Management (FIRM) was initiated to support communication amongst community members, service providers, scientists and policy makers ensuring participation.

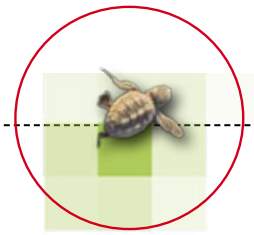
Making use of the FIRM platform, local level monitoring was considered the next step in addressing drought and desertification. This component was given impetus by Namibia's Drought Policy and Strategy which stated that farmers will assume greater responsibility for drought management by demonstrating they have reduced their vulnerability by managing agricultural operations in an economically and environmentally responsible manner, taking low rainfall and resultant income variation into account. Working together, FIRM members identified indicators they would find useful for their decision-making to combat desertification and reduce income variation and dependency on government's drought relief. Working with community members, scientists participating in the FIRM took the required photographs, made fodder availability calculations and recommended stocking rates which were then made available to the individual farmers for visual comparison in booklet form. Scientists working through the FIRM also prepared monthly, annual and long-term record keeping forms and graphs for use by farmers.

The most important aspect of the local-level monitoring is its use by farmers, through discussion and two-way information flows (e.g., at FIRM meetings), to share and use their results for individual and community decision-making. Individual decisions, reinforced by comparison

with other community members, focus on planned marketing of livestock in suitable condition at appropriate times. This contrasts with the usual 'emergency' marketing to pay school fees or as the livestock condition deteriorates during low rainfall periods. Community decisions tend to focus on rotational grazing, shifting of fences to enhance management, or other aspects of cooperative management of communal grazing.

The impact of this on the ground can be readily observed in the form of enhanced understanding by farmers of the results of management actions and greater involvement of farmers in monitoring their own biophysical/natural resource environment and using the results to support their management actions. This case study highlights the importance of communication amongst community members, service providers, scientists and policy makers and appropriate platforms to ensure that communication takes place. As community based natural resource management gained in strength in some areas, this was used as the banner to take local level monitoring further. In other areas, community action plans were distilled from the FIRM approach and adopted by water point committees and their service providers. The approaches used by Namibia's evolving program to combat desertification are presently being mainstreamed within the agricultural ministry and adopted by a number of programs. Even though many policies and programs state that participation is important, the true benefits of participation in combating desertification are only slowly being recognised and adopted.

From Stringer, L.C et al (2007). Implementing the UNCCD: Participatory Challenges. Natural Resources Forum 31, 198–211



Monitoring

Like the NBSAPs, clear targets and indicators of progress are missing from most NAPs. This not only makes it difficult to assess the overall success of the plan, but also the success of the participatory approaches. Compared to biodiversity and climate change indicators, there is a dearth of information on desertification, which poses much more of a challenge in terms of quantification. COP8 called on parties to develop nationally and regionally relevant indicators for the implementation of the 10-year Strategy for consideration by the CRIC, which is responsible for developing reporting guidelines for the parties, and to improve comprehensive and participatory monitoring and evaluation. First results are to be discussed at COP9.[56]

National Adaptation Plans of Action 2.3

The decision to undertake the formulation of National Adaptation Plans of Action (NAPAs) came at a much later stage of negotiations under the UNFCCC than the other two Rio conventions. The first decade of the UNFCCC negotiations were mainly oriented around

[55] *www.unccd-gm.org*

[56] *UNCCD (2007). Report of the Conference of the Parties on its eighth session, held in Madrid from 3 to 14 September 2007.*

negotiating mitigation action by industrialised countries. During a lull in the mitigation negotiations, pressure mounted from the countries that would be (or in fact, already were) most affected by the impacts of climate change – mainly the group of Least Developed Countries (LDCs). As a result, the NAPA process was initiated for the LDCs by a decision taken at the seventh Conference of Parties to the UNFCCC, held in 2001 in Marrakech.

It should be noted at the outset that there is a difference between the *raison d'être* of the national action plans under the CBD and UNCCD, and the NAPAs. The NBSAPs and NAPs, as the cornerstones of national implementation of the CBD and UNCCD respectively, are expected to set out a long term strategy and vision for national action. NAPAs, meanwhile, are a 'quick' way to *communicate priority activities addressing the urgent and immediate needs and concerns of the least developed countries (LDCs), relating to adaptation to the adverse effects of climate change.*[57] The preparation of NAPAs is also seen as a capacity building measure - information contained in them may constitute the first step in the preparation of initial national communications, and would help to build capacity for addressing urgent and immediate adaptation needs.[58]

The NAPA process specifically requests a concise document with a list of priority actions aimed at accessing funds from the LDC Fund (LDCF) and other sources. Each of the priority actions are to be elaborated in a two-page activity profile. The agreed purpose of the NAPAs appears to be to prepare a list of priority projects over a period of 12-18 months, and then seek funds for implementation.

A detailed set of guidelines were prepared by the LDC Expert Group before the NAPA process was initiated in countries. The guidelines reiterate the need for a participatory process to identify priority action that is multidisciplinary; complementary to existing plans and programmes (including NBSAPs and NAPs); aimed at sustainable development; promotes gender equality; promotes country ownership; promotes sound environmental management; and is cost effective.

The guidelines offer a step-by-step guide on the process of putting together the plans, as well as a detailed structure for the presentation of the document. Detailed annexes emphasise the importance of synergies among MEAs; mainstreaming NAPAs and integrating adaptation into national development strategies; and prioritisation of activities.

The annex on achieving synergies with other MEAs recognises that *(t)he preparation of NAPAs is the first step towards developing long-term plans for responding to climate change… to be undertaken in a short period of time and utilis(ing) existing information. In contrast, the preparation of NAPs under the UNCCD and NBSAPs under the CBD is a slower process involving more in-depth examination of particular issues (including new research) and extensive consultation with stakeholders. Given the time and resource constraints on the preparation of NAPAs, national teams*

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[57] *UNFCCC (2002). Annotated Guidelines for the preparation of National Adaptation Plans of Action. LDC Expert Group. http://unfccc.int/files/cooperation_and_support/ldc/application/pdf/annguide.pdf*

[58] *Decision 28/ CP.7, paragraph 2 of the Annex*

can take advantage of the information gained and lessons learned through the development of NAPs and NBSAPs to, for instance, identify sources of vulnerability and key adaptation requirements.

The annexes recognise that not all action related to adaptation needs to be direct interventions, and that it is equally important to lay the groundwork for future adaptation activities – for instance, through capacity building, education and awareness raising, and institutional reform.

Planning

The emphasis on 'urgent and immediate needs' in the NAPAs resulted in a focus on short-term project-based action. The focus on the production of a list of projects for support, meanwhile, strengthened the perception that the NAPAs are mainly about fund raising. It is hardly surprising that Bangladesh saw the need to invest US$44 million from its national budget to launch a national plan exercise shortly after preparing a NAPA – the NAPA process was clearly not considered sufficient to serve as the basis for planning long-term national adaptation action.

The NAPA process shares many shortcomings with its (admittedly more elaborate) predecessors. The NAPAs were prepared in a shorter time than the NBSAPs and UNCCD NAPs and with more limitations on resources, and were expected to rely on the groundwork laid by the earlier national planning exercises.[59] The planning process is therefore unlikely to have been more intensive than, or to have overcome the hurdles faced by, the UNCCD NAPs and NBSAPs. In the NAPA documents, linkages with the two processes are mainly mentioned cursorily.

The NAPAs are also focused on project-based support, and are therefore less likely to have encouraged policy and institutional reform or cooperation between government sectors and programmes. This is indicated in a 2007 analysis carried out by the United Nations Institute for Training and Research (UNITAR), which showed a strong preference for sectoral projects in the NAPAs completed until then. Of the 276 NAPA project profiles analysed from 21 NAPAs, only three were for policy reform and institutional restructuring, and there were none for intergovernmental collaboration.[60] The high percentage of sectoral and national projects indicated a strong influence of line ministries (rather than affected communities, for instance) in deciding priorities.[61]

The planning process in some countries suffered from the lack of time and resources to develop the NAPAs – this was cited as a key barrier in an analysis of the NAPA process in

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[59] *UNFCCC (2002). Annotated Guidelines for the preparation of National Adaptation Plans of Action. LDC Expert Group. http://unfccc.int/files/cooperation_and_support/ldc/application/pdf/annguide.pdf*

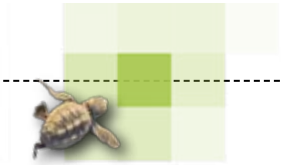
[60] *UNITAR (2007). Analysis of NAPA Project Profiles. United Nations Institute for Training and Research. Climate Change Programme. Geneva, August*

[61] *Osman-Elasha, B. and Downing, T.E. (2007). Lessons learned in preparing national adaptation programmes of action (NAPAs) in Eastern and Southern Africa. European Capacity Building Initiative. http://www.eurocapacity.org/downloads/ecbi_NAPA_PA_Project_2007.pdf*

eastern and southern Africa. The lack of technical expertise at the local level also hindered effective participation.[62]

Whereas the importance of prioritising a limited number of activities makes sense from the point of view of the limited availability of funds, it is bound to reduce the 'ownership' of the resulting list to the few whose priorities are included, while causing some amount of disillusionment among those whose priorities have been left out. Moreover, such a static list with few opportunities for updating and revision seems unsuitable given the ever-changing nature of adaptation needs. In Uganda, for instance, some civil society representatives feel that whereas the NAPA preparatory process was not satisfactorily participatory, the priority list is focused too much on issues that were in the limelight at the particular time when the NAPA was being prepared. Once the NAPA was finalised, the document has become the central focus of adaptation activities in the country at the expense of changing realities on the ground.[63] The LDC group has submitted a proposal suggesting that the NAPAs are regularly updated.[64]

Despite a suggestion in the NAPA guidelines to house the planning process in a development planning institution, NAPA teams were mostly led by environment ministries or meteorological departments. Institutional barriers were listed as a key constraint in the compiling of the NAPAs, with bureaucratic structures hindering the free exchange of information.[65]



Implementation

It is too early to assess the effectiveness of NAPA implementation at this stage (as of January 2009, 12 projects were underway).[66] However, it is already apparent that implementation of the Plans is suffering from an acute lack of resources. The NAPAs depend mainly on the LDCF for funds. As of February 2009, the LDCF had a total of US$182 million pledged.[67] The total cost of the projects identified in 21 NAPAs completed by May 2007 (17 more NAPAs have been finalised since then) was already over US$341 million, leaving a considerable gap.[68]

Like the earlier two NAP processes – and in fact more so, given the focus on identifying a list of projects – the NAPAs have raised expectations that funds will be made available

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62 *ibid*

63 *Climate and Development Network (2008). Pers comm*

64 *http://unfccc.int/resource/docs/2008/sbi/eng/misc08.pdf*

65 *Osman-Elasha, B. and Downing, T.E. (2007). Lessons learned in preparing national adaptation programmes of action (NAPAs) in Eastern and Southern Africa. European Capacity Building Initiative. http://www.eurocapacity.org/downloads/ecbi_NAPA_PA_Project_2007.pdf*

66 *http://www.climatefundsupdate.org/listing/least-developed-countries-fund*

67 *ibid*

68 *Jallow, B.J. (2007). NAPAs and National Communications. Presentation made by the chair of the LDC Expert Group in Cairo, September 2007*

to implement the listed projects. If this expectation is not met, many NAPA documents emphasise that it will result in a serious lack of credibility in the global climate change process within their countries. Most LDCs have invested time, effort and resources in preparing the NAPAs based on the understanding that funds would be made available for implementation. Whereas a different approach is indicated in the future, it is important (particularly given the lack of trust in the climate negotiations at this stage) that this commitment is honoured and the "goalpost is not shifted" in the middle of the game.

In the future, however, a different approach (broadly described in the conclusions) is needed for dealing with adaptation in particular, given the role of strategic development planning in reducing overall vulnerability of people to climate change impacts. National plans need to be well integrated in development planning, but without deflecting resources from existing development priorities. A project-based approach is unlikely to lay the groundwork needed to address the root causes of vulnerability effectively, although it may create a false sense of progress through 'visible' projects on the ground. Moreover, adaptation is a very live and ever-changing challenge that cannot be dealt with by a static list of projects. There has to be is constant monitoring of impacts, with the flexibility to constantly adapt responses.

An assessment of NAPs in Uganda, Niger and Bangladesh

As part of this analysis, government and non-government stakeholders were interviewed in three countries – Uganda, Niger and Bangladesh – for a quick snapshot of the contribution of national action plans (NAPs) to national implementation of the goals of the Rio conventions. Diversity in the approaches countries took to institutionalize an answer to environmental challenges where observed. Although the exact extent to which the NAPs have had a direct impact was difficult to assess in all three countries, a number of common challenges in developing, integrating and implementing the plans were discernible. The case studies highlighted the lack of finance from both domestic and international sources. Implementation was perceived to be slow, although some progress was noted towards increased awareness and capacity building and the "greening" of development (for instance, through increased awareness of sustainable land management among agriculture practitioners).

Uganda

Uganda completed its CCDNAP in 1998, NBSAP in 2002, and NAPA in 2007. Of the three, the CCDNAP has had the most success so far. Implementation was initially frozen by a total lack of funding. In 2002, a Road Map for Resource Mobilisation for the Implementation of National Action Programme to Combat Desertification and Land Degradation in Uganda resulted in assured funding for all NAP-related projects. The CCDNAP has led to increased awareness in SLM issues and increased participation of relevant actors as well as in new policies and laws – it is attributed with influencing the review and preparation of the National Agricultural Advisor Services Act 2001, National Tree Planting Act 2003 and the National Policy for Conservation and Management of Wetlands, among others. Barriers to the achievement of its objectives include lack of appropriate technologies, illiteracy; low representation of women in the higher managerial levels; weak coordination and lack of complementary roles played

by different actors and lack of comprehensive policies and regulations to support decision making processes and implementation of SLM; factors mentioned generally as hindering integration of sustainability concerns.

A number of activities related to the goals of the NBSAP are also being implemented. However, the NBSAP was criticized by civil society for not being consultative enough, and not involving the districts and community levels. To implement the NAPA, a multi-sectoral National Climate Change Steering Committee has been set up. A 'NAPA Village Concept' has been developed to facilitate communities and local level institutions to take the lead in implementation of adaptation activities, with local government simply facilitating the process.

Although the CCDNAP and NBSAP are streamlined into the Poverty Eradication Action Plan (PEAP), the main national planning framework, practical implementation and integration is still a challenge because of the lack of clear outputs, and hence budget support. There are no plans, however, to streamline the NAPA into the PEAP – according to the Meteorological Department, the immediate and urgent impacts of climate change addressed in the NAPA should be funded from the LDC Fund, and hence there is no need for it to be integrated into the PEAP, as this may delay the delivery of assistance to affected communities. Instead, a more comprehensive adaptation plan should be prepared to address long-term climate change impacts, for integration into the PEAP.

Niger

In Niger, the three conventions are administered by the same coordinating body - the Conseil National de l'Environnement pour un Développement Durable (CNEDD, the National Environmental Council for Sustainable Development). CNEDD has been decentralised down to the regional level, with the creation of eight regional environmental councils for sustainable development (CREDDs). In some regions, decentralisation has progressed to the next level.

The NBSAP, which was the first to be prepared, served as a starting point for the formulation of the UNCCD NAP and both were taken into account while preparing the NAPA. The series of national strategies and action plans were subsequently integrated into the rural development strategy and the medium-term action programme (PAMT), which is incorporated in the development and poverty reduction strategy and the rural development strategy. Several intersectoral promotion and coordination bodies have been created and put into operation. These planning tools have improved programme integration. A range of projects and activities have contributed to environmental objectives (especially in the areas of desertification control, biodiversity improvement and conservation, carbon sequestration through tree planting operations, the protection of watersheds and koris (wadis), the rehabilitation of degraded land, regeneration, the creation of agro forestry parks and the development of water management plans.

However, efforts to implement the programmes associated with the Rio conventions have been erratic, owing to a lack of funding. The lack of national expertise in the area of climate change adaptation is another major constraint. A monitoring process for the three NAPs was established and set in motion, but then put on hold, owing to a lack of resources. The mechanism was created with the ministries involved, based on a top-down and bottom-up approach.

Bangladesh

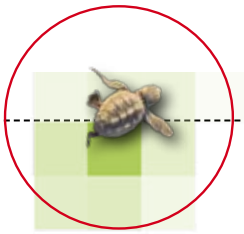
Bangladesh completed all three plans in 2005. Whereas actual implementation has not yet started, a number of complementary projects funded by multilateral and bilateral agencies are underway. A key problem highlighted with regard to all three NAPs – as well as the recently concluded National Capacity Self Assessment (NCSA) – is the lack of individual, institutional and systemic capacity for implementation.

Stakeholders are frustrated by the lack of initiative in implementing the CCDNAP, and some feel that it fails to sufficiently articulate the links between land degradation and the country's ecosystem health, agricultural productivity and livelihoods of the poor. About US$1.5 million has recently been cleared for a GEF/UNDP project on Capacity building and Resource Mobilisation for Sustainable Land Management in Bangladesh.

Although the NBSAP process has helped to some extent to raise awareness, including in an acknowledgement of the role of biodiversity in dealing with poverty in the second round of the national Poverty Reduction Strategy, biodiversity conservation continues to be a low priority with other government departments due to lack of information on the economic value of biodiversity and ecosystem services, lack of resources, lack of effective partnerships and the lack of appropriate mechanisms and institutions.

Of the 15 projects mentioned in the NAPA, two have been developed into Project Information Forms (PIFs) and submitted to the GEF for funding. A Climate Change Cell established at the Department of Environment in 2004 under the comprehensive Disaster Management Programme of Bangladesh aims to facilitate mainstreaming of climate change risk management in national development planning. The Bangladesh Ministry of Environment and Forest (MOEF) has launched a National Climate Change Management Strategy and Action Plan (CCMSAP) in 2008, allocating about US$44 million from the national budget for the process, and additional funds may be provided on an annual basis. The CCMSAP process was launched because the NAPA was felt to be inadequate in capturing the emerging implications of climate change and its impacts on overall development in Bangladesh, particularly in the aftermath of Cyclone Sidr and the increasing frequency of floods in the country. CCMSAP aims for a more broad-based and holistic approach to adaptation than the NAPA, to be implemented over the 2009-2018 period. A multi-donor Trust Fund has been established, which has since been upheld as a model for other countries as a possible way of allowing a more integrated national response to climate change.

Source: Based on case studies provided by Israt Jahan (Bangladesh), Proscovia Nalugya (Uganda) and Boubacar Zalia Yacouba (Niger).



Monitoring

Like the NBSAPs and the UNCCD NAPs, the overall NAPA process and individual NAPA documents lack a roadmap with clearly defined goals and targets. Benchmarks and indicators of progress are mostly project-specific and very generalised.

3

Exploring global expectations

Before exploring the key elements for a successful NAP process to implement MEA commitments at the national level, it is worthwhile revisiting global expectations from these national planning exercises. National planning exercises initiated under MEAs are mainly expected to:

- identify national options and priorities to implement MEA commitments, while improving the governance framework for global environmental issues (through participatory and decentralised decision-making), coherence (including mainstreaming of environmental concerns into development processes) and accountability; and
- identify activities that can be considered for external financial assistance, capacity building, technical support, etc.

NAPs may not have resulted in a significant increase in funds for national implementation of MEA commitments in practice. Despite this, the link between national planning and the expectation of increased funding has several negative impacts on the focus and effectiveness of NAPs.

Undermining clarity on goals: What exactly are the NAPs expected to achieve? Are they meant to be exercises aimed at donors, with one eye on activities and projects that would attract the most funding, or are they meant to be nationally-driven planning exercise to engage the mainstream development community and civil society, provide a platform for debate and discussion to resolve conflicting views, and identify meaningful solutions that go beyond individual projects?

Expecting them to do both (conduct a serious national planning exercise and at the same time identify projects and activities that will attract donors) risks the possibility that the focus shifts from convincing key development sectors of the need or action and providing a platform to debate and resolve (oftentimes controversial national) issues, to convincing donors. There is little incentive, in such a scenario, to engage the development community and invest in convincing them of the worth of addressing climate change or desertification or biodiversity loss. Outcomes are usually minimal, limited to scattered 'pilot' projects of doubtful collective benefit rather than an integrated approach. Instead, to increase the chances of accessing limited global funds, it becomes important to ensure the 'NAPA-bilty' of projects and activities, for instance. The target audience of national planning becomes global, not national.

Undermining ownership: On one hand, NAPs are expected to be intensely nationally-driven participatory processes to identify national opportunities and barriers for MEA implementation. At the same time, they are meant for submission (some might even say approval) to the global community, linked with the strong expectation that funds from multilateral and bilateral

sources will be forthcoming as a result. Problems arise when the focus shifts more to meeting donor expectations to attract limited global funding – at the cost of national ownership and overall effectiveness. It is no surprise that the review of the NBSAP process by CBD describes them as *unprioritised lists of projects for international funding, aimed more at international donors than a national audience.*

In such cases, where the need for a national planning exercise is not fully internalised but is seen rather as an elaborate fund raising exercise, a formulaic approach (for instance, by following global guidelines to establish steering committees and task forces and holding local level meetings to the letter) is adopted to tick all the right boxes to meet donor conditionalities, instead of developing a process more suited to national circumstances. As a consequence, controversial or sensitive national issues are largely avoided.

If funds for implementation don't eventually materialise, then the whole national planning exercise yields very little – at least, little compared to investments and potential of such a planning exercise.

Undermining mainstreaming and synergies: The use of NAPs to identify funding priorities for also undermines the goal of mainstreaming. Instead of linking up with similar existing processes, there is an incentive to create and sustain new planning exercises, in the hope that this will somehow result in more international funding. In fact, some developing countries oppose global calls for 'mainstreaming' because they fear it will further reduce the possibility of seeking external financial assistance.

Mainstreaming is sought to be achieved through the setting up of new national steering committees (NSCs) each time, which include members from other agencies and departments. In reality, NSCs are often mere tokenism. They are mostly headed by environment departments, which simply lack the clout to influence other government sectors in many countries. Representatives from other sectors in these NSCs are usually not highly placed enough to influence policies and programmes. Moreover, the resources available to these NSCs are usually insufficient to back up even the day to day functioning (certainly not beyond the life of the planning process), leave alone to implement their recommendations.

Undermining existing national processes: National planning exercises are therefore carried out without any real interaction with national development strategies or processes – and as a result, may end up undermining national systems, institutions and procedures. For instance, by bypassing the national budgets, the national plans also bypass accountability to national parliaments.

Many developing countries already have systems, processes and/or institutions for decentralised governance in place, which could benefit greatly from a further injection of support. Instead of encouraging and incentivising the use of such existing systems and processes for national planning for MEAs, however, each national action plan starts to reinvent the wheel and have its own one-off and poorly resourced consultation. Stakeholders are invited for a consultation meeting without sufficient capacity building and subsequently kept uninformed of follow-up

or outcomes. This can do more harm than good in the long term, by eroding confidence in participatory processes - particularly a concern given the number of such national planning exercises that take place, and assuming that each one of these will initiate a consultation process but most likely not deliver on outcomes.

4 Lessons for further NAP development and implementation

National action plans under the Rio conventions appear to have had limited success in realising the expectations of the global community and foremost of national stakeholders. They have faced very similar challenges, indicating fundamental problems with the design of such planning exercises. They have largely failed to deliver on the promise of additional funding, while facing major challenges in being accepted as legitimate national planning exercises. They have also failed to effectively reach out to the development community and bring about mainstreaming.

Yet, they remain a popular tool. As mentioned in the introduction, there are indications that there might well be calls for all developing countries to prepare national adaptation plans for accessing funds for adaptation, and there is continuing talk of updating NBSAPs and UNCCD NAPs. Implementing existing NAPAs, NAPs and NBSAPs is a pressing issue. The following chapter tries to extract a number of lessons learnt from the past for further national development, revision and implementation of NAP as well as for the ongoing international debate on NAP.

4.1 Lessons for national Implementation

A national commitment to an integrated, decentralised, and participatory process of planning and implementation is one of the main ingredients of a successful NAP. As the experience with the NBSAPs as well as the UNCCD NAPs shows, any national planning exercise is more likely to succeed if its need is fully internalised.

Some of the key lessons from the NBSAP, UNCCD NAP and NAPA processes for achieving success at the national level are summarised below.

Focus on establishing a process, not producing a document: The focus of the planning exercise should be to establish an effective and durable participatory process for integrated planning, implementation and monitoring, rather than on a one-off national consultation process resulting in a national plan document. The opportunity to design an indigenous framework that is suitable to national circumstances and is aware of national strengths and weaknesses could contribute further to creating ownership of the process. The outcomes of the planning exercise should be flexible and open to change through a continuous participatory process, to reflect ongoing learning and changing circumstances.

Leadership: High level political leadership and involvement is essential to signal any significant changes from business as usual, and rope in other related sectors. Individual 'champions of the environment' – driven individuals – from various sectors can play a key role in initiating and sustaining initiatives. Political support is critical to keep the process alive and to provide the mandate to enable the institutional changes needed to promote mainstreaming. Capacity building of politicians through the provision of relevant information to encourage debate and discussions may be needed. Such efforts will also be needed at the local level, as the involvement of local government, including politicians, in sub-national planning, implementation and monitoring is crucial to build and sustain political commitment throughout the process.

Umbrella framework to lay the groundwork: National planning exercises are more likely to be successful if basic needs to ensure meaningful participation are in place before the process is initiated - for instance, through the provision of relevant and sufficient information to all stakeholders, and infrastructure and institutional structures to enable networking and communication. This process will need time and resources, and can be made more cost effective by linking various national planning exercises.

An umbrella framework for national planning, implementation and monitoring related sustainable development efforts, based on national structures and mechanisms for decentralised planning and encompassing key environment and development processes, could help to bring down the cost of such national planning exercises. By pooling resources available for related activities, the framework could invest in mechanisms and infrastructure for decentralised planning (including regular systems of participation, debate, analysis and planning), and in common activities such as awareness raising and capacity building. This would encourage better integration of the process into existing governance structures, and better coherence between related activities.

Break out of the environment ghetto: Planning processes led by environment ministries and departments often run the risk of being sidelined by other departments and sectors, either due to the low ranking given to environment departments or because of a perception that links with environmental efforts will weaken the development focus of key economic sectors. Often, the latter perception is strengthened by members of the environment community who advocate extreme and one-sided solutions that are hostile to development efforts. To counter such perceptions and win over key sectors, resources and time are needed to generate and disseminate information elaborating the linkages between environment and key national sectors, including information on the links to livelihoods and economic valuations of ecosystem services. Guidance on mechanisms and practical approaches to ensure better integration into sectoral plans and policies could prove useful.

Use existing structures and processes: Many countries already have systems of decentralised governance in place. The use of such existing processes for MEA planning holds several advantages: it would serve to further strengthen them; allow more coherence and mainstreaming as development and environment concerns are channelled through the same processes; and allow for capacity retention, since these systems are more likely to be better resourced and

hence stand a greater chance of a life beyond the planning process. Such systems also probably already have systems of communication among different stakeholders, and are hence likely to inspire more faith in the participatory processes.

Participation: Both the range and depth of participation in national planning for sustainable development strategies needs to be improved, and mechanisms are needed to ensure the involvement of stakeholders in every step, including implementation and monitoring, not just planning. With regard to the range of participation, greater efforts are needed to bring on board the voices of traditionally marginalised groups by overcoming social and cultural barriers; the private sector and the scientific community. Sub-national planning is essential to identify and address local priorities, by ensuring wider participation at the local level – including the active involvement of, and leadership from, local politicians.

While a global or national-level 'best practices' directory on participation could provide technical support and contribute to the richness of participatory exercises around the world, there is danger that following global guidelines to the letter without adapting them to national and local circumstances may prove counterproductive.

To ensure that the participation is meaningful, necessary tools and resources need to be provided before, during and after the consultation process. Before the consultation, stakeholders should be given sufficient notice to prepare their contribution. Where needed, resources and capacity building efforts tailored to local needs should be provided to bring all stakeholders up to speed.

Flexibility should be employed in deciding the methods of ensuring broad and active participation. Workshops and meetings may not be the best method in all cases. For instance, where social and cultural hierarchies exist among stakeholders, equal dialogue may be difficult to achieve in a setting that reinforces such hierarchies and other less formal opportunities may be required. After the consultation, stakeholder participation must be maintained in the implementation and monitoring processes. Stakeholder initiatives to take charge and implement outcomes should be encouraged. Open dialogues should be encouraged in order to resolve gaps and differences of opinion, or to record such differences in cases where resolution is not possible.

Subsidiarity and sub-national strategies: Environments vary enormously and often even decisions taken at the district level cannot be sensitive to these variations. It is the community that is most familiar with their own environment as well as with the social and political dynamics and are therefore best placed to work out the most effective solutions. If the goal is also to promote good environmental governance, then adherence to the subsidiarity principle should be followed at the global as well as national levels to allow the national plans to address national stakeholder concerns and priorities.

National governments have a role to play in setting up a supportive policy and institutional framework to allow each village or community to plan according to its specific environment and socio-economic circumstances.

Lessons from Tanzania

Tanzania's National Strategy for Growth and Reduction of Poverty is viewed as an "iconic and enduring" success story of a nationally-developed policy process that effectively mainstreams environmental issues into poverty reduction strategies. Key lessons from a 2007 review of the process, of relevance to national planning processes under MEAs, are listed below.

1. National leadership is essential for environmental mainstreaming: Environmental mainstreaming takes time and is best driven by national or local champions within and outside government, preferably empowered with a high-level mandate. External partners can help support this through building partnerships, offering technical assistance according to demand, sharing lessons, and providing catalytic financial support. But they cannot, and should not, attempt to lead the process.

2. The 'environment' needs to be framed as a major component in poverty reduction – and not as a brake on development: A key challenge is to see people as part of the solution to halt environmental degradation and to build environmental assets to support livelihoods of the poor. This involves changing the views of environmental agencies, NGOs and others away from a focus on environmental protection to one of seeing environment as a driver of growth and a foundation for livelihoods.

3. Trade-offs between development and environment cannot be avoided: Development activities can help environmental conservation, and vice versa, and such win-wins should receive priority attention. However, the scope for win-wins is not inexhaustible, and there are ecological limits and basic welfare needs which should be protected. Debates and decision-making procedures need to lead towards some of these fundamental trade-offs, even if they are not the initial focus of environmental mainstreaming.

4. Generating evidence and sharing knowledge on poverty-environment links is key: Awareness of poverty and environment linkages is essential to bring about changes in people's perceptions and behaviour, but these linkages tend not to have been fully explored in most countries. This calls for research, analysis, and sharing of new and existing knowledge with decision-makers (and the general public) to demonstrate the livelihood and economic significance of environmental issues.

5. All stakeholders need the chance to explore their environmental contributions and sensitivities: Many sectors will not have a clear understanding of what 'environment' means, and may feel that they are doing nothing on the environment when they actually are (e.g. water and health sectors). To counter this, debate and useable national and local guidance on what environment means to each sector – as opportunities, dependences, and threats – will be essential.

6. Listening to – and promoting – the voices of poor people is central to effective mainstreaming: Local consultations which clearly articulate the views of poor people, and enabling these voices to be heard at higher levels, can accelerate environmental mainstreaming more generally by

driving home human dimensions. The whole process of raising up voices of poor people takes time, financial resources, and political commitment, but builds real ownership and effective strategies and policies.

7. The private sector needs to be involved throughout: A lesson derived from an area where Tanzania has perhaps been less successful is the challenge of engaging the private sector (from small to large enterprises) in environmental mainstreaming. Without effective engagement, it will be more difficult to attract private investment and create incentives for innovation, technological development and behavioural change.

8. Donor harmonisation and budget support need to be informed of, and responsive to, poverty-environment links: Improving donor harmonisation, as a means to deliver more effective assistance to national governments, is crucial for implementing many national poverty reduction processes. Such processes are now increasingly supported by direct budget support under common or joint assistance strategies.

9. Technical assistance should respond to demands, and enable local capacities: Technical assistance for environmental mainstreaming should be demand-driven. It works best in areas where it is needed by national and local stakeholders, and where it is timely. If this is supplied by external expertise it needs to be time-bound and focused on using and building local capacities.

10. Budgets count! Effective engagement of ministries in environmental mainstreaming can only be assured when it affects their budgets. The acid test of success in environment mainstreaming is when environmental issues have teeth by being included in the budget process, in sector budgets (government and others'), and in expenditure tracking systems.

11. Alliances with stakeholders of other cross-cutting issues can be mutually rewarding: Bringing different cross-cutting groups together during the policy processes can: (i) help groups to learn from each other on the tools and best practices of mainstreaming; (ii) build alliances between groups to better address shared issues (e.g. the environment and gender, children and HIV/AIDS); and (iii) reduce transaction costs of several separate mainstreaming exercises.

12. The timing of mainstreaming work is key: Environment needs to be addressed at the beginning of a process. It can be useful to map various key national policy or planning processes, and their openness to environmental issues, and then seek entry points at the beginning of relevant review and/or new processes. This may mean having to wait for the start of a new process, sowing the seeds for future mainstreaming, and being strategic in using the openings and opportunities created (rather than implementing major initiatives at the end of an old process).

From Assey et al. 2007. Environment at the heart of Tanzania's development: Lessons from Tanzania's National Strategy for Growth and Reduction of Poverty (MKUKUTA). Natural Resource Issues Series No. 6. International Institute for Environment and Development. London, UK

Local level strategies are essential to overcome the hurdle of translating national plan to local level-action while allowing for local level prioritisation and ownership, especially in large and diverse countries. While national level strategies can help develop a broad vision and provide support for local strategies, they should avoid prescribing activities for local and sectoral players. Local strategies are likely to generate more effective leadership and support. Opportunities for integration are most evident at the local level. At the community level in many developing countries, distinctions between biodiversity and desertification and climate change – or in fact development and environment - have usually paled. For instance, a community dependant on natural resources or small scale agriculture is more likely to recognise the immediate links between good watershed and biodiversity management, land degradation and local poverty. What matters more is a comprehensive approach to address environmental degradation that threatens livelihoods and habitats. Lack of funds is not always the issue at this level – mobilised and empowered communities who depend on their immediate environments for livelihoods are generally willing to work for its regeneration, making even small amounts of money go a long way.

Realistic planning: A key shortcoming of national plans appears to be that they are too ambitious, while in actual implementation they only deliver isolated projects of dubious benefit to the overall goals of the national strategy. Plans and strategies at every level need to be realistic rather than overly ambitious, with a clear roadmap and short and long term goals clearly spelt out. Budget implications should be carefully worked out and considered, along with policy, institutional and capacity implications.

Monitoring: The identification of clear indicators or benchmarks of progress are essential to ensure that goals are met, and hence to ensure the overall success of the planning exercise. The indicators should focus on periodic assessments of shorter term goals - broad indicators related to overall success are not useful in indicating progress during the implementation process, while there is still an opportunity to make changes in order to achieve long term goals.

The monitoring should be carried out by all stakeholders to ensure its integrity, and to make governments and stakeholders accountable to each other. Open channels of communication among stakeholders and government are needed throughout the implementation and monitoring process in order to communicate concerns and suggestions, and for sharing knowledge of best practices. Effective monitoring systems may need investments in both resources and capacity.

Funding: One of the reasons why national planning exercises do not realise their potential is that they are usually carried out with limited budgets which do not allow for investments in laying the groundwork for successful planning, and with no idea of the resources that will be available for implementation. The result is that whereas the action plan itself becomes a wish list of everything that should be done, reality strikes when implementation fizzles down to a few isolated projects of dubious value to the overall goals of the action plan.

There are several options for maximising the effectiveness of existing sources of funding at the national level, including: pooling resources for all national planning exercises (including

development planning exercises that are often better funded) to address common elements such as capacity building, education and awareness raising; internalising plans into national planning and budgetary processes to ensure consistency of goals; better harmonisation of donor funding; and greater involvement of the private sector. The plans should be used to spur on local-level action based on new synergies and linkages, where possible, without waiting for some sort of international 'go-ahead' through the provision of funds.

The national planning exercise is likely to be successful only if there is a commitment to exploring these and other options – over-reliance on using the national plan to leverage external assistance may skew the focus of the national plan, or result in lost opportunities for addressing elements of that need which rely not too much on additional funding.

Capacity building: In many cases, what countries need before and in the course of such planning exercises is the buttressing of their capacity to benefit from it – including, for instance, mechanisms and institutions for effective decentralised decision-making; targeted information to win the support of a broad range of stakeholders; capacity to prioritise and cost implementation activities accurately; resources to keep the NAP alive beyond the planning process; resources and capacity to establish monitoring systems; and resources to retain whatever capacity and momentum is built during the NAP process. Despite the number of national planning exercises that have taken place so far, it is difficult to say to what extent they have contributed to overall capacity building in the long term.

4.2 Lessons for MEA governance

Before launching into any further planning exercises or revisions, the global community would do well to be clear about expectations from MEA-related NAPs and ensure that these expectations are realistic.

Clarity of purpose: To make the national planning more effective, conventions bodies need to ensure clarity of purpose. National actions plans will be most effective if they are allowed, by the global community, to truly function as nationally-owned and -driven planning exercises that are designed in-situ to suit national circumstances and to promote maximum sub-national ownership and engagement through strengthened processes for decentralised governance. Their accountability to the global process should be limited to the achievement of demonstrable progress on agreed goals.

The true potential of national action planning under MEAs lies in their critical role in giving national and sub-national stakeholders the chance to become active participants in global and national environmental governance, and enabling countries to take a coherent and strategic approach in integrating environmental concerns into national development priorities. In the end, it is everyday actions by individuals at the local level, decisions on investments and regulations taken in climate sensitive sectors and even by the private sector that will decide the success of MEAs. These are the levels at which national action plans have to function,

if they are to succeed. Currently, the plans have not realised this potential. To allow this to happen, the international and national community still needs to clearly delineate this – truly complicated task - as a primary purpose of national planning.

Learn from the development community: Realising that uncoordinated processes and projects that lack country ownership run the risk of treating symptoms rather than root causes and results in sporadic benefit at best, the global development community has recognised and addressed the need for greater ownership and harmonisation to some extent.

This shift is reflected in the 2002 Monterrey Consensus on Development Finance which resulted in the 2005 Paris Declaration on Aid Effectiveness, described as an 'ambitious plan to reform the system of aid delivery' and signed by more than 100 countries and donor organisations. The Declaration is based on the understanding that aid is more likely to promote development when it promotes ownership (developing country leadership over their development policies and plans), alignment (donor support based on country development strategies and systems), harmonisation of aid, managing for results (developing countries and donors orient their activities to achieve the desired result) and mutual accountability (donors and developing countries are accountable to each other for progress in managing aid better and in achieving development results).

The global environment community has been slower in recognising the importance of designing funding mechanisms that promote greater national ownership. Developing country dissatisfaction with the financial architecture has dogged all three Rio Conventions from the start. Governments as well as stakeholders have often expressed their opposition to the donor-driven approach, which focuses mainly on project-based funding and employs long-drawn and complicated procedures for allocating funds. With high transaction costs and an over-reliance on procedure-specific expertise that can only be provided by implementing agencies, this approach is also impractical - particularly in the case of climate change where the volume of funds is expected to increase dramatically.

The creation of the Adaptation Fund Board (AFB) under the Kyoto Protocol is seen as a step forward in more representative governance, which will allow developing and affected countries to have an equal role in deciding what the funds can be used for, the criteria for allocation and disbursement, as well as systems of accountability.

If developing country governments have greater freedom in decisions regarding the use of funds, they no longer need to regard national action plans mainly compete over a very limited pot of funding. This should make it more feasible for the national plans to take a more stakeholder-driven approach, and undertake a more candid national stocktaking that includes sensitive or controversial 'national issues' that might not otherwise be included in a plan meant for approval by the global community. National stakeholders, meanwhile, will feel more confident and in control of a process where they can hold their own elected governments more directly accountable for decisions and outcomes, instead of trying to demand accountability or change from a global funding institution.

Allow a national dialogue to take place: The future strategy of the UNCCD's Global Mechanism already recognises an important implication of an intensely nationally-driven process: environmental concerns will have to compete with other development concerns for funds from national budgets. Environment lobbies (including government environment departments, government and non-government organisations and institutions and the scientific community) will have to shift their focus from winning over the support of donors, to winning support of national governments by convincing them of the wider benefits of implementing relevant international agreements. They will need additional support from the global community in generating and providing the information to convince the development sector, and in developing funding strategies that include ways and means to convince national governments of the benefits of funding MEA implementation, but this is a dialogue that is long overdue in many countries.

Allow for better synergies and overcome "MEA" egoism: Rather than calling for the establishment of separate planning processes of the and between the MEAs, the global and national community should encourage the integration of planning in existing development processes and mechanisms to ensure consistency, encourage dialogue and maximise the use of limited resources. This will help strengthen existing systems of decentralised governance. It will increase the chances that the momentum and capacity built during the consultative phase will continue past the planning stages, and allow stakeholders to continue to play an active role in updating the plans, and in implementation and monitoring.

Countries should also be encouraged by MEA bodies to decide whether they are best served by one national plan, or need an overall national strategy with several sub-national plans that retain the richness and complexity of local-level challenges. Trying to flat-pack the results of varied sub-national consultations into one national plan, particularly in large countries, will make stakeholders feel left out and confused about their contribution. This also runs the risk that when the time comes to unpack them for implementation, they are no longer in tune with local or sectoral needs.

Simplify the complex relationship with development: Coherence between national plans addressing development as well as environment issues is needed at the global and national levels. Mechanisms need to be developed which will allow countries to either choose to scale up existing plans to take on board new concerns, or to set up a process to ensure more than a cursory partnership between them. For instance, poverty reduction strategies and sustainable development plans will need to be altered considerably to take on board the need to build in climate resilience. Some countries may decide to use the PRSPs as the main tool to address adaptation to ensure maximum integration.

The global community has been hesitant to mainstream funds for MEA implementation into national development plans and budgets. Developed countries have resisted it because of concerns that the funds will be used to address development rather than global environment concerns. Developing countries have preferred to have a clear distinction between the two in the interests of maintaining the 'additionality' of environmental action, and of resources over and above ODA.

It was mainly for this reason that at Rio, funds for environment were clearly separated from development funding and subject to their own processes, procedures and detailed definitions of what exactly constitutes global environmental benefit. Over the years, however, it has become clear that this has resulted in a problem where environmental projects and activities are not sufficiently well integrated into development goals. The reliance on a separate pot of funds further encourages the environment sector within countries to function in its own bubble and set up its own systems, without sufficient resources or political clout to back it. This compromises the achievement of environmental goals.

It has become increasingly clear that the achievement of environmental goals is not possible without cooperation from the development sector, which tends to be better funded and has the advantage of more reliable structures and institutions. For example, the case study from Namibia clearly showed that poorly funded 'flash in the pan' participatory exercises that are hurriedly patched together, with barely any advance notice to participants and without adequate resources to prepare, implement or follow up only serve to severely erode trust in such planning efforts. Stakeholders need to have the information they need to be able to participate meaningfully, and the institutional backup to sustain this participation.

Individual MEAs are unlikely to generate the kind of resources needed to carry out these activities. Unless the environmental community is willing to work with the development community to pool resources and efforts both at the global as well as national levels, MEAs may never be able to notch up the capacity to fight individual battles on each front.

To simplify this rather complex relationship between development and environment funding and action and engender cooperation, the concerns of developed and developing countries need to be addressed.

On developed country worries that funding for environmental concerns will be swallowed up for development-as-usual projects: this is a battle that has to be fought and won within developing countries, between the environment and development sectors, to engender better understanding. The longer it is put off, the more unlikely it is that true and effective mainstreaming will take place.

For developing countries to be convinced that this is indeed a good idea, a clear commitment is needed that better coordination between environment and development processes will not result in a reduction of funding, and the commitment for additional resources to address MEA concerns will be honoured. Developing countries need to be convinced through transparent means that the environment agenda will not be overloaded onto the already limited ODA that is made available to address essential needs like healthcare and education.

Allow flexibility in process: Any requirements or guidelines for national planning driven by the convention bodies should thus refrain from being too prescriptive. While guidelines may be useful for some countries, the actual design of national planning processes should derive from what is found to be most suitable to national (social, economic, institutional etc.) circumstances and the needs of stakeholders.

Focus on reliable, increased and more efficient funding: 'Predictable', 'new', 'reliable' and 'additional' are words that have become mantras in MEA negotiations, to the extent that their true significance is often forgotten. Effective and practical planning is only possible – and useful – if there is a clear idea of the resources that will be available to implement action in the short and medium term. Otherwise, there are no limits to keep planning realistic and ensure they are not overly ambitious. The lack of predictable and sufficient financial resources further hampers implementation; retention of frameworks, institutions and capacity; as well as effective monitoring for results.

Within developing countries, measures to maximise the impact of limited resources will be needed, including better synergies and integration between existing development processes, mechanisms and institutions.

Emphasis on results instead of perfect project documents: The focus of MEAs so far has been largely on complicated and long-drawn criteria for accessing funds as a way of ensuring results. This approach has been resource intensive, but the final results remain in question. Meaningful changes are not achieved by perfecting a project document, or through one project, or even over a short period. A better approach to ensure accountability would be to combine a light touch process to access predictable funds and allow longer- and medium-term planning, with a much greater focus on accountability through monitoring of implementation and evaluation of results. This will require investments in the strengthening of capacity of countries and communities to manage the implementation and to monitor and report results.

Bottom-up accountability: Finally, the role of civil society in holding governments accountable to MEA commitments is a key to the success of MEAs. The global community has tended to rely on measures to ensure top-down accountability from national governments instead of investing sufficiently in strengthening the capacity of civil society within countries. This may be the shorter, easier and (questionably) cheaper way towards accountability; it is by no means the most desirable. A combination of financial and technical resources from the international community (particularly to give voice to marginalised groups) and their own domestic political resources (such as social networks, knowledge of institutional relationships and tacit rules of political engagement, and permanent presence to take advantage of sporadic opportunities and ensure long-term programme success) will allow civil society to be much better placed to demand accountability and usher in major reforms.

An important way to ensure that governments take on board environmental (and other sustainable development) concerns is not for the global community or donors to intervene, but rather to build the capacity of civil society within countries to deal with their own governments. An active, critical and empowered civil society is the most democratic, effective and durable route to keep national governments accountable for their national and global commitments.)

5 Conclusions

National action plans and strategies have a very important role to play in the implementation of sustainable development – but only if their need is fully internalized at the national and local level, and the process is nationally driven. Existing processes suffer from a schizophrenia that must be cured before any new national planning process is agreed or extended under the Rio conventions. Changes are needed at the global and national levels to make this happen, adequately reflecting lessons from past processes under the Rio conventions, as well as from the development community.

However, it is equally important that existing agreements are honored. A decision by the global community to call for national planning as a precursor for funding cannot be taken lightly, or without a firm commitment from all parties to live up to the agreement in good faith. Unfulfilled commitments may only create the illusion of progress and activity for short time periods. They run the risk of eroding credibility of globally-led processes at the (crucial) national and local levels, where implementation has to eventually take place.

Meanwhile, an opportunity for change exists under each of the three Rio conventions. In the coming months, a decision will be made under the UNFCCC on the best way to support national-level adaptation. The UNCBD is debating the need to revise existing NBSAPs. Under the UNCCD, the ten-year strategy for the implementation of the UNCCD presents an opportunity for "second generation" NAPs that could reflect the urgent changes needed.

We need a break from "convention egoism". There is a slow recognition of the need for these three conventions to work together, while cooperating more strongly with development efforts. This should lead to integrated planning following a national logic rather than individual, parallel Convention mechanics. This process needs to be accelerated before any of the processes commits to a lonely path once again. Part of breaking with "convention egoism" would be to come along with a joint vision on how to institutionalize enhanced regional capacities for support to National action plans and strategies and their implementation, rather than calling for separate structures.

At the global level, stronger mechanisms than existing efforts are needed to make this happen. The manner and extent to which global funding is provided sends out the strongest signal, and needs change regarding issues such as who eventually makes the decisions on what to fund; whether joined-up approaches with development efforts are encouraged or discouraged; how the funds enter the national system; and how much finance is forthcoming (too little and too dispersed creates an incentive for "putting out several pots to catch stray raindrops" and impedes effective planning and implementation).

At the national level, the ripples have to spread beyond just the environment sector. Internationally agreed environment agreements need to be broken down to reflect national goals and integrated into development planning. For this to happen, the environment sector has to enter into dialogue with the development sector, armed with relevant and localized information – including, for instance, the contribution of ecosystem services to the (national or local) economy and poverty reduction; and the costs of inaction. Key players must be convinced of the need to address these issues, for MEA implementation to move onwards from the production of over-ambitious documents, to clear and realistic goals, timelines and results. Individual and organizational capacities need to be strengthened in the course of the processes.

Integrated approaches are perhaps simplest to implement at the local level (partly perhaps because so far at least there are fewer vested interests to create separate pots of money!). Communities have proven their ability to design joined-up measures to address, for instance, soil, water and biodiversity management. This capacity for integrated action should be encouraged and serve as a model for national and global decision making.

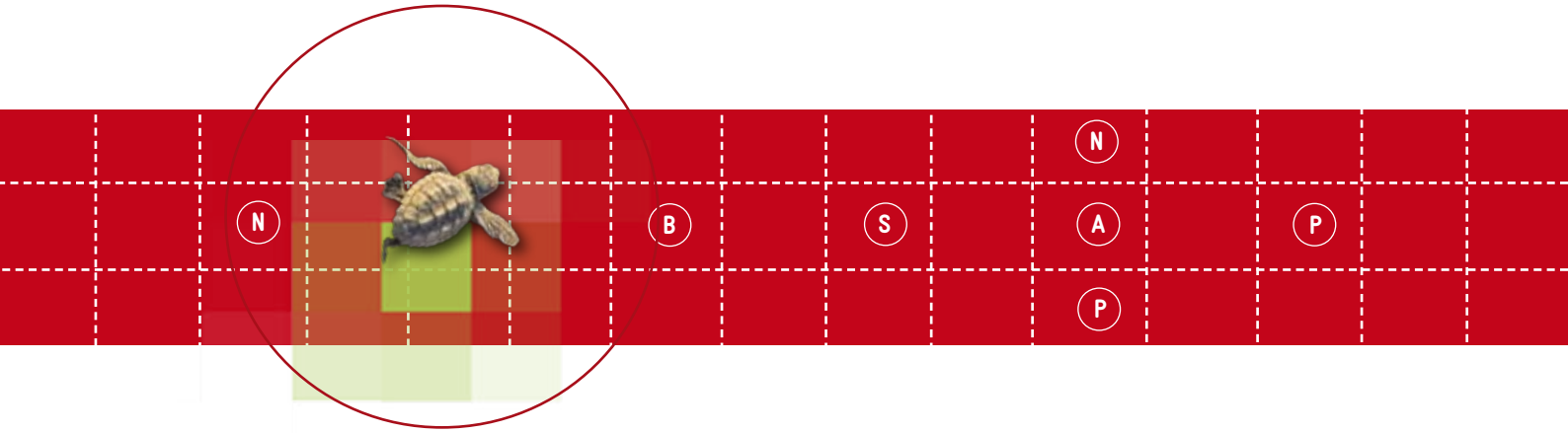
Finally, the emphasis of MEAs must move away from endless debate and negotiations on institutional issues to proven results on the ground very soon. Ongoing efforts need to be acknowledged in order to maintain credibility and encourage a learning process on how to improve actions. Further efforts are needed. At the end of the day, concrete results speak louder than words.

List of Acronyms

AFB	Adaptation Fund Board
BPSP	Biodiversity Planning Support Programme
COP	Conference of the Parties
CSO	Civil society organisation
CSEA	Consolidated Strategy and Enhanced Approach
CRIC	Committee for the Review of the Implementation of the Convention
FIRM	Forum for Integrated Resource Management (Namibia)
GEF	Global Environmental Facility
GM	Global Mechanism
GTI	Grupo de Trabajo Interinstitucional (Honduras)
IFS	Integrated Financial Strategies
LDC	Least Developed Country
LDCF	Least Developed Countries Fund
MDG	Millennium Development Goals
MEA	Multilateral Environmental Agreements
MOEF	Indian Ministry of Environment and Forests
NAP	National action plan (refers to plans under environmental conventions); UNCCCD NAPs refers to National Action Plans under the United Nations Convention to Combat Desertification

List of Acronyms

National Adaptation Plan of Action	NAPA
National Biodiversity Strategies and Action Plans	NBSAP
National Coordinating Bodie	NCB
National Capacity Self Assessment	NCSA
Non Governmental Organisation	NGO
National Implementation Plan	NIP
National Steering Committee	NSC
National Sustainable Development Strategies	NSDS
Poverty Reduction Strategy Plan	PRSP
Sustainable land management	SLM
Sector Wide Approaches	SWA
United Nations Convention on Biological Diversity	UNCBD
United Nations Convention to Combat Desertification	UNCCD
United Nations Development Programme	UNDP
United Nations Environment Programme	UNEP
United Nations Framework Convention on Climate Change	UNFCCC
United Nations Institute for Training and Research	UNITAR



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